



Ethical Sourcing Code  
December 2018

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## Ethical Sourcing Code

- The Ethical Sourcing Code applies to all GUD Companies.
- GUD Companies select Suppliers that demonstrate a commitment to implementing policies and practices consistent with our own.
- Suppliers who conduct their operations in accordance with the standards in this Code are preferred Suppliers.
- This Code should be openly communicated to the Supplier's workers.

### A. Slavery Practices

No use of 'slave' labour, being labour which is:

- Forced or compulsory
- Subject to a bonding arrangement
- Indentured or otherwise involuntary

Unethical practices include:

- Exercising any 'ownership' type powers over workers (no sale or trafficking)
- Using child labour i.e. employing children under the local legal age for completing compulsory education or otherwise below the minimum legal working age set locally or the International Labour Organisation Convention being 15 (or 13 for light work) or 18 (for hazardous work)
- the use of force, coercion, fraud or abuse of power to recruit or retain labour
- Confiscation of identity/travel documents or requiring money deposits, bonds or recruitment fees for work
- Cruel, inhuman, degrading treatment or placing workers in danger or fear of harm to themselves or others
- Deceptive recruiting for labour or using employment agencies or labour brokers which engage in the unethical practices listed above
- Benefitting directly or indirectly from or contributing to modern slavery

Ethical labour practices require:

- Fair and humane treatment of workers
- Freedom of workers to leave at the end of their shifts, or their employment after giving reasonable notice
- Transparent record keeping of workers' details, hours and wages
- Documenting verification of the age of workers and their right to work

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## B. Labour Standards

Compliance with local laws (or collective bargain agreements) regulating:

- Wages, overtime entitlements and legally mandated benefits
- The length of the working day, work breaks and maximum work hours
- Mandatory days off work each week
- Immigration law compliance including employment only of workers with a legal right to work

Unethical practices include:

- Deduction from wages for disciplinary measures or other deductions not provided for by law or freely consented to
- Mandatory or uncompensated overtime
- Physical, verbal or other forms of harassment, bullying or abuse

Ethical labour practices require:

- Treating workers with dignity and respect
- Providing workers with written and understandable information about their wages, conditions and other terms upon recruitment
- Wages to be paid on time and in full
- Keeping records of any disciplinary action and having fair and open grievance mechanisms in place

## C. Health and Safety

Working conditions (and any supplied worker's accommodation) shall meet or exceed local legislative or ILO standards for health and safety.

Ethical labour practices require:

- Incorporating safety measures relevant to the industry and conditions to promote incident prevention, fire protection and health preservation
- Use of machinery safeguards and personal protective equipment
- Meeting minimum conditions of appropriate heating, ventilation, lighting and noise levels
- Access to adequately stocked first aid equipment
- Adequate and regular training for workers to perform their jobs safely
- Identifying, assessing and minimising the impact of emergency situations by implementing emergency plans and response procedures

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- Exercising extreme care with dangerous materials or hazardous substances and ensuring the availability of medical care
  - Implementing a certified health and safety management system
  - Hygienic conditions without risk to health, including access to clean drinking water, proper sanitation of premises, appropriate facilities for food storage and separate accommodation by gender

## D. Discrimination

Conditions of employment must be based on an individual's ability to do the job, as determined objectively and not decided on the basis of personal characteristics or traits as listed below;

- No discriminatory practice with regards to recruitment, compensation, access to training, promotion, termination of the employment agreement or retirement, based on race, gender, nationality, religion, age, physical or mental disability (if irrelevant to the requirements of the job), marital status, sexual orientation and/or union membership or political affiliation

The rights of workers to lawfully associate or not in groups of their choosing shall be respected, including their right to join or form trade unions and participate and benefit in collective bargaining or like arrangements.

## E. Environmental

Sound environmental management best practices include:

- Compliance with relevant local and national environmental protection laws
- Taking preventative measures to minimise the environmental impacts of the Supplier's business
- Maintaining procedures for notifying local authorities in the event of an environmental accident resulting from the Supplier's operations
- Compliance with relevant international or applicable local laws affecting processes used to manufacture products, such as:
  - Waste management
  - Appropriate management of hazardous materials or restricted substances
  - Minimisation of harmful emissions

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- Conservation and protection of scarce resources including:
    - Efficient use of resources, including energy and water use
    - Recycling
  - Developing an environmental management system to minimise environmental impacts and improve environmental sustainability

## F. Business Ethics

Business ethics involves ensuring honesty, transparency, accountability, integrity and respect in business relationships.

Unethical practices include:

- Bribes, favours, benefits or other similar unlawful or improper payments in cash or in kind
- Extortion or corruption whether to obtain business or otherwise

In their commercial dealings with GUD Companies, Suppliers are required to:

- preserve the confidentiality of information they may receive, store it securely (physically and in accordance with best practice IT standards), not disclose it to third parties and use it only to fulfil the GUD Company's contract or business
- refrain from assigning or sub-contracting fulfilment of GUD Company contracts, unless with the prior consent of the GUD Company
- refrain from any unauthorised use of the intellectual property of GUD Companies

## Questions

Any questions in relation to this Code should be directed to GUD's Company Secretary and General Counsel.

*Approved 18 December 2018*