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# Active Design Labour Standards Policy

## 1. POLICY STATEMENT

1.1 At Active Design we are committed to:

acting ethically and with integrity in all our business dealings and relationships;

implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains and that our suppliers comply with all applicable laws in the territories in which they operate;

continual improvement and periodic review of this policy, taking into consideration changes in legislation, and any other requirements to which we subscribe, in order to ensure its adequacy, suitability and continuing effectiveness; and

making sufficient resources available for the implementation of this policy.

1.2 We are committed to ensuring there is transparency in our own business and in our approach to achieving the minimum standards set out in Section 3 of this policy (the '**Minimum Standards**') and to tackling modern slavery throughout our supply chains. We expect the same from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we will seek to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same standards.

1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, distributors, contractors, external consultants, third-party representatives and business partners.

1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

## 2. WHO IS RESPONSIBLE FOR THE POLICY?

2.1 The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

2.2 The Directors have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control

systems and procedures to ensure they meet the Minimum Standards, and that they are effective in countering modern slavery.

2.3 Managers at all levels within Active Design are responsible for ensuring those reporting to them understand and comply with this policy.

### 3. MINIMUM STANDARDS

3.1 Active Design recognises the correlation between poor labour standards and poor-quality goods and services. As such, Active Design is committed to ensuring both it and its suppliers reach minimum labour standards at all times.

3.2 These minimum labour standards, devised by reference to Social Accountability International's SA8000 document and the UN Universal Declaration on Human Rights, are as follows:

(a) **Child Labour** – Active Design does not engage in or support the use of child labour in any form including armed conflict, forced and bonded labour, prostitution, drug trafficking, procurement of children for illicit activity, or in dangerous work. If Active Design engages any young workers (for example, on work experience), it will ensure that a suitable risk assessment is carried out and that young persons are not exposed to any hazardous conditions, or in any case work more than 8 hours per day.

(b) **Forced & Compulsory Labour** – Active Design shall not engage in or support the use of forced or compulsory labour, or bonded or involuntary prison labour. Employees are free to leave upon reasonable notice.

(c) **Health & Safety** – Active Design shall provide a safe and healthy workplace environment and shall take effective steps to prevent potential accidents and injury to employees' health by minimising, so far as is reasonably practicable, and in co-operation with its employees, the causes of hazards inherent in the workplace. All employees will receive safety and job specific instructions during the course of their employment with Active Design. Employees shall have access to clean sanitary facilities and drinking water.

(d) **Freedom of Association** – the freedom of association is respected and Active Design will comply with UK labour relations legislation in this regard.

(e) **Discrimination** – Active Design shall not engage in or support any discriminatory practices in hiring, remuneration, access to training, promotion, termination or retirement based on race, national or social origin, caste, religion, gender, sexual orientation, political affiliations, age or other conditions that could give rise to discrimination.

(f) **Disciplinary Practices** – Active Design shall treat all employees with dignity and respect. Active Design shall not engage in or tolerate the use of corporal punishment, mental or physical coercion or verbal abuse of personnel. No harsh or inhumane treatment is permitted.

(g) **Working Hours** – Active Design shall comply with applicable laws and industry standards on working hours and holiday entitlements. Active Design's normal working hours do not exceed 48 hours per week, and overtime hours do not normally exceed 12 hours per week. Active Design ensures all employees have the legal right to be employed in the UK.

(h) **Remuneration** – Active Design shall comply with national laws and regulations with regard to wages and benefits. All work-related activities are carried out on the basis of a recognised employment relationship established according to national law and practice.

#### 4. YOUR RESPONSIBILITIES

4.1 You must ensure that you read, understand and comply with this policy.

4.2 Adherence to the Minimum Standards, and the prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

4.3 You must notify your Manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

4.4 You are encouraged to raise concerns about any deviation from the Minimum Standards or any issue or suspicion of modern slavery in any part of our business or the supply chains of any level of supplier at the earliest possible opportunity.

4.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your Manager or report it in accordance with our Whistleblowing Policy as soon as possible.

4.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains breaches the Minimum Standards, or constitutes any of the various forms of modern slavery, raise it with your Manager.

4.7 We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion of a breach of the Minimum Standards or that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

#### 5. COMMUNICATION AND AWARENESS OF THIS POLICY

5.1 Training on this policy, and on the risk our business faces from a breach of the Minimum Standards or from modern slavery in its supply chains, will form part of the induction process for all individuals who work for us, and training will be provided as necessary.

5.2 We will seek to communicate our policy as appropriate to suppliers, contractors and business partners at the outset of our business relationship and reinforce as appropriate thereafter.

#### 6. BREACHES OF THIS POLICY

6.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

6.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.



Martin Seabrook

Managing Director