

The Fibre Revolution Ltd Labour Standards and Ethical Trade Policy forms part of our overall social compliance strategy.

Section	Title	Page
1	Purpose	1
2	Scope	1
3	Definitions	1 - 2
4	Introduction	2
5	Policy Statement	2 - 5
6	Responsibilities	5 - 6
7	Raising Concerns	6 - 7
8	Communication	7
9	Document Control	Revision Record

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| 1 | Purpose | 1 |
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- 1.1 The purpose of this policy is to set out Fibre Revolution’s approach and commitment to labour standards and ethical trade as part of our overall social compliance strategy.

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| 2 | Scope | 1 |
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- 2.1 The scope of this policy covers all personnel within Fibre Revolution’s control and influence, including employees, home-workers and suppliers.

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| 3 | Definitions | 1 - 2 |
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For the purpose of this policy, the following definitions apply:

- 3.1 **Child**  
Any person under the age of 15, unless the minimum age for work or mandatory schooling is higher by local law.
- 3.2 **Forced or compulsory labour**  
All work or service that a person has not offered to do voluntarily and is made to do under the threat of punishment or retaliation or that is demanded as a means of repayment of debt.



**3.3 Human trafficking**

The recruitment, transfer, harbouring or receipt of persons, by means of the use of threat, force, deception or other forms of coercion, for the purpose of exploitation.

**3.4 Living Wage**

The remuneration received for a standard working week by a worker in a particular place sufficient to afford a decent standard of living for the worker and their families. Elements of a decent standard of living include food, water, housing, education, health care, transport, clothing, and other essential needs including provision for unexpected events.

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| 4 | Introduction | 2 |
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Fibre Revolution Ltd is a manufacturer of dry moulded fibre products and packaging.

We have a global supply chain that has been mapped for both country risk and individual supplier risk. Each supplier undergoes an individual risk analysis based on our supplier assessment questionnaire, external audit and review of evidence.

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| 5 | Policy Statement | 2 - 5 |
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At Fibre Revolution Ltd we are committed to working towards integration of labour standards, ethical trade principles, social responsibility and good stewardship throughout our supply chain.

These are key business practices that enable us to work with our suppliers and contractors to ensure that working conditions and labour practices employed in the manufacture of our products are socially acceptable (taking into account local laws and regulations).

Fibre Revolution Ltd has implemented the following ethical code of conduct.

1. Employment is freely chosen:
  - All employment is freely chosen.
  - There is no forced, bonded or servitude labour.
  - Worker-paid recruitment fees, lodging of 'deposits' and confiscation of worker original identification documents is prohibited.
  - Workers are free to leave their employer after reasonable notice.

Modern slavery is a criminal offence (Modern Slavery Act 2015); it is exploitive and deprives basic human liberty and freedom. Should instances of modern slavery be identified then the company shall provide support and access to remedy for the victims.



2. Freedom of association and the right to collective bargaining:
  - All staff are entitled to belong to trade unions and collective bargaining is respected, to the extent permitted by local law.
  - The employer is required to adopt an open attitude towards the activities of trade unions and their organisational activities.
  - Worker's representatives are not discriminated against and have access to carry out their representative functions in the workplace.
  - Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.
  
3. Working conditions are safe, healthy and hygienic.
  - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
  - Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
  - Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
  - Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
  - The company observing the code shall assign responsibility for health and safety to a senior management representative.
  
4. Child labour is not used.
  - Young persons under the age of 18 shall not be employed at night or in hazardous conditions.
  - There shall be no new recruitment of child labour and in instances where a child is found to be employed, then the company shall engage in a programme to provide for them to transfer to quality education until no longer a child.
  
5. Living wages are paid:
  - Wages are fair and comparable and at a minimum meet, national legal standards or industry benchmark standards, whichever is higher.
  - Equal pay for equal work is established on the basis that employees that perform the same role using the same skill, effort and responsibility are given the same pay level.
  - Deductions from wages as a disciplinary measure shall not be permitted.



6. Working hours are not excessive and will not exceed any employment legislation.
  - Working hours must comply with national laws.
  - All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole.
  - The total hours worked in any seven day period shall not exceed 60 hours, except where covered by the clause directly below.
  - Working hours may exceed 60 hours in any seven day period only in exceptional circumstances where all of the following are met:
    - » this is allowed by national law;
    - » this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
    - » appropriate safeguards are taken to protect the workers' health and safety;
    - » the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
  - Workers shall be provided with at least one day off in every seven day period or, where allowed by national law, two days off in every 14 day period.
  
7. No discrimination is practiced.
  - There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
  - Human rights (Human Rights Act 1998) are respected, and workers are provided the means to report grievances to management.
  
8. Regular employment is provided:
  - To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
  - Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub- contracting, or homeworking arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.
  
9. Discipline.
  - Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.



10. No bribery, corruption, blackmailing or bullying is permitted.
11. Good environmental stewardship is practiced.
12. Suppliers and buyers are both free to sell and buy from any number of other businesses. No trading restrictions as a way of guaranteeing business are allowed.

Our Ethical Code of Practice is based on the International Labour Organisation (ILO) code of practice and Ethical Trade Initiative (ETI) base code and follows the SMETA (Sedex Members Ethical Trade Audit) audit and best practice guidance.

We actively support suppliers to integrate and acknowledge this code of practice within their own supply chain helping to guide improvement for the wellbeing of all employees.

Our social compliance process is managed through Internal Associate's BRAND Integrity Management programme.

Social compliance audits are based on the International Labour Organisation (ILO) code of practice and follow the ILO Indicators of Forced Labour; these include:

- Abuse of vulnerability
- Deception
- Restriction of movement
- Isolation
- Physical and sexual violence
- Intimidation and threats
- Retention of identity documents
- Withholding of wages
- Debt bondage
- Abusive working and living conditions
- Excessive overtime

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| 6 | Responsibility | 5 - 6 |
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6.1 **Board**

The Board and non-executive directors provide support and strategic direction for the company's social compliance strategy.

6.2 **Departmental Managers**

Departmental managers are responsible for ensuring:

- Staff understand the process and policies in each of their departments.
- That any social compliance training (including induction and policy training) is recorded on the company training platform.
- Educating and working with staff, suppliers and contractors to ensure their wellbeing, safety and social compliance.



### 6.3 Technical Department

The technical department is responsible for:

- Collation of social compliance data from suppliers and uploading to the BRAND Integrity Management software platform.
- Data analysis and reporting of the social compliance performance.
- Arranging third party audits where required.
- Tracking and follow up of social compliance corrective actions

### 6.4 Employees

Employees are required to comply with the company’s policies and procedures as set out in their employment contract, handbook, and training plans.

Reporting of social compliance incidents and concerns is the responsibility of every member of staff.

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| 7 | Raising Concerns | 6 - 7 |
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7.1 Fibre Revolution will provide clear routes by which concerns can be raised by employees. These include:

Internal Routes of Communication:

- Immediate Manager
- Company HR
- Company Director
- Through the HR secure drop box located on the internal rear wall of DC5 warehouse.
- IT helpdesk for data breach / privacy policy issues

External Route of Communication:

- Protect for public interest disclosure (whistleblowing):
  - » Protect Website: <https://protect-advice.org.uk/>
  - » Protect Telephone: 020 3117 2520
  - » Protect E-mail: <https://protect-advice.org.uk/contact-protect-advice-line/>

7.2 Employees are an important element in the company’s stance on social compliance. They are positively encouraged and expected to raise any concerns that they may have on these issues where they are associated with the company’s activity.

7.3 Employees should normally raise concerns through their immediate manager; however, it is recognised that they may feel inhibited in certain circumstances. In this case, employees should approach HR or one of the directors directly.

7.4 Interested parties can raise concerns through our ‘contact us’ page, on the website (<https://www.fibrerevolution.com/contact-us/>)



- 7.5 If an issue is raised it shall be escalated and managed as follows.
- Any risk identified shall be reviewed, assessed and presented to the Head of Technical.
  - The risk shall be discussed directly with the supplier / organisation and a corrective action plan implemented.
  - Initiate an unannounced 3<sup>rd</sup> party audit if required.
  - If the incident is significant or if the supplier is unwilling to co-operate then the incident shall be escalated by the Head of Technical to Procurement and the executive team (Chief Commercial Officer, Chief Operations Officer, Chief Business Development Officer).
  - Fibre Revolution will support the supplier / organisation with regards to addressing any issues, however, should the supplier / organisation be unwilling to improve then Procurement will commence seeking an alternative supplier and the supplier shall be suspended from our Approved List of Suppliers.
  - Notify the relevant national enforcement office to intervene.

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| 8 | Policy Communication | 7 |
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This policy is communicated through the following mediums:

- company shared drive /group intranet.
- company website ([www.fibrerevolution.com](http://www.fibrerevolution.com)).
- company notice boards.
- supplier social compliance portal (BRAND Integrity Management)

The policy will also be made available to all interested parties and can be requested directly through our 'get in touch' email ([information@fibre-revolution.com](mailto:information@fibre-revolution.com)).

Signature:



Place of Issue: Bourne, PE10 0DN, UK

Name: Neil Wilson

Issue Date: 09/01/2025

Position: Executive Director

Review Date: 09/01/2025

