

VOW Europe Limited (Company No. 1204488)
Supplier Code of Conduct

As an industry leader in the supply of workplace supplies and services, VOW Europe ('VOW') recognises the importance of operating a sustainable and ethical supply chain and of engaging in responsible procurement. We expect our suppliers to treat their workers with dignity and respect, adhere to all applicable laws and regulations, and manufacture their products in an environmentally sustainable manner.

This document sets out our requirements in detail and is closely aligned to the Ethical Trade Initiative Base Code. We require each supplier (and all third-party suppliers and sub-contractors used by the supplier in connection with the manufacture of their products) to comply with it.

1. **Forced Labour:** Suppliers shall ensure that employment is freely chosen and that they do not use or support forced labour, whether in the form of prison labour, indentured labour, bonded labour, or otherwise. Suppliers must allow employees to keep their own identification documents and to resign from their positions at any time. Suppliers shall not require employees to lodge 'deposits', to withhold salary, benefits, property or documents that force employees to continue work. Employees will be given the right to leave premises after their workday and the right to end employment after reasonable notice. Suppliers will not use nor support human trafficking.
2. **Freedom of Association and Collective Bargaining:** Freedom of association and the right to collective bargaining should always be respected. Suppliers shall recognise and respect the right of employees to freedom of association and collective bargaining, they will not interfere, and management is encouraged to engage in direct communication with employees to forge a collaborative work environment.
3. **Health and Safety:** 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. Suppliers shall comply with applicable laws and regulations. Suppliers shall identify, assess and minimise the impact of emergency situations by implementing emergency plans and response procedures. These plans and procedures must include the following: emergency exits are accessible and fully functional at all times, fire extinguishers must be visible, accessible, present and charged, evacuation plans must be posted and drills must be conducted annually. In addition, the Supplier shall identify, evaluate and control exposure to hazards and ensure the use of any applicable personal protective equipment.
4. **Child Labour:** Suppliers shall not use nor support the use of child* labour (legal apprentices excluded). Child labour is defined as work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children. Suppliers shall not employ people younger than 18, or the minimum age for the completion of compulsory education, or the minimum age of employment required by law in the country of manufacture, whichever is highest. Children and young persons under 18 shall not be employed at night or in hazardous conditions. Suppliers must establish and maintain written policies and procedures for remediation of child labourers and shall provide adequate financial and other support to enable such children to attend school.
5. **Wages and Benefits:** Suppliers shall pay employees at least the minimum wage required by applicable laws and regulations, or the prevailing industry wage if no minimum wage law applies and shall provide legally mandated benefits. In addition all workers shall be provided with written and understandable Information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

6. **Hours of Work/ Compensation:** Employees should not be required to work more than 60 hours a week, or the maximum number of work hours per week permitted in the applicable country of manufacture, whichever is less, except in extraordinary business circumstances and in agreement with the employee. Employees should be granted at least one day off in every seven-day period. In addition to their compensation for regular hours of work, all overtime hours should be voluntary, and Suppliers shall compensate employees for overtime hours at the applicable premium rate in their country. In countries that have not established premium overtime rates, Suppliers shall not pay employees less than their regular hourly rate for overtime hours.
7. **No Discrimination is Allowed:** Suppliers shall not subject any person to discrimination in employment. They will ensure that 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.
8. **Harassment and Abuse:** Suppliers shall treat every employee with respect and dignity. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
9. **Ethical Standards:** Suppliers are held to the highest standards of integrity. Corruption, bribery and extortion are strictly prohibited. Suppliers must respect all intellectual property rights and applicable regulatory requirements of the countries from and to which they deliver. Suppliers (and their subcontractors) will comply with all applicable laws / regulations regarding ethical trading, including but not limited to the Modern Slavery Act 2015. Suppliers should ensure that none of its officers has been convicted of any offence involving slavery and human trafficking and that they have not been the subject of any investigation or enforcement proceedings regarding slavery and human trafficking.
10. **Environmental Impact:** Suppliers must meet all applicable environmental laws and regulations in their country to manage hazardous materials and all waste and emissions materials. In addition, Suppliers are encouraged to have environmental policies, and environmental management systems containing goals with targets that are focused on the continuous improvement of overall environmental performance. The supplier must ensure that all products supplied are free from substances or preparations classified as dangerous by the EU. The supplier must warrant that all products supplied shall be compliant with current E.U.T.R. (European Union Timber Regulation) legislation that prevents the sales of illegal timber/timber products.
11. **Animal Welfare:** For products containing animal-derived materials, suppliers shall not tolerate any cruelty or animal neglect. Suppliers will take into consideration the five animal freedoms, as defined by The World Organisation for Animal Health.
12. **Human Rights:** in addition to the specific matters covered above, VOW observes and requires all of its suppliers to observe all applicable human rights laws and codes of conduct applicable to them in the territory/ies in which they are based and in which they operate.

To ensure compliance with our Code of Conduct, VOW shall have the right to monitor suppliers through audits by its own employees or via a third-party company. If it is determined that a supplier does not comply with the Code of Conduct, we will strive to work with the supplier to develop and implement appropriate corrective actions. Nevertheless, depending upon the circumstances, VOW may elect to end its relationship with a supplier at any time for failing to adhere to this Code.

* Child: Every boy and girl under the age of 18. The UN Convention on the Rights of the Child (1989) says: "For the purpose of this present Convention, a child means every human being below the age of 18 years unless, under the law applicable to the child, majority is attained earlier" (article 1).