

Delmore Ltd

Labour Standards Policy.

Delmore Ltd manufactures a range of foam and textile products which are supplied to the NHS via the following Framework Agreement.

Transacted Textiles (OJEU Reference 2013/S 069-114686) Ref: FAG000016448

The company is committed to upholding an ethical policy which is appropriate in nature and scale to the company and in line with its status, as defined by EU and UK Law, as an SME.

This policy complies to the NHS code of conduct.

The purpose of this policy is to promote understanding and awareness throughout the supply chain to ensure we protect and promote the rights of all employees.

As part of, or commitment to Quality Assurance Standards and ISO 1009 (2015) we continually assess and monitor our own performance and process controls, and those of our suppliers in order to ensure that standards are continuously improving.

Delmore commits to making available adequate resources for the implementation of this policy. The Labour Standards Policy is maintained by Miss E Munro Director of Delmore Ltd.

1. Introduction

Delmore recognises its obligation to provide customers with the best quality products and services at a competitive price; ensuring that no person as part of the supply chain is exploited or treated in a way that does not conform to legislation. This policy outlines the standards that all involved within the business seek to adhere to.

Delmore Ltd is fully aware of the responsibilities it has to all parties involved in the production of each of the many stages of the manufacture of its products. It has developed its own Labour Standards Policy to ensure that all those connected with its business should likewise adhere to the same standards and policies.

2. Aims

The aim of this policy is to promote understanding and awareness of employment laws and ethical standards. By detailing labour standards to all parts of the supply chain, Delmore hopes to develop better ethical standards and encourage suppliers to develop their own labour standards.

3. Policy Statement

Delmore shall comply to all employment laws and legislation relevant to its business.

Delmore shall comply to the Health and Safety act 1974.

Delmore shall comply with all other Employment legislation

Delmore shall keep up to date all documentation relevant to the above.

Delmore shall comply with ETI Base Code and its suppliers to do the same.

Our compliance with the above is kept up to date using the following resources:

<https://www.ethicaltrade.org/eti-base-code>

www.acas.org.uk

www.wageindicator.org/China-custom

www.sancroft.com

www.china.org.cn

4. Management Representative and duties and training.

The management representative assigned the responsibility of implementing an effective Labour Standards Policy is Elizabeth Munro, Managing Director and proprietor.

- Delmore commits to making available adequate resources for the implementation of this policy.
- To review and improve labour standards policy regularly.
- To implement training of staff involved in Labour Standards and include them in the training records system and auditing.
- To develop procedures to meet policy requirements.
- Documentation and communication relating to Labour Standards should be kept on file including any criticisms and complaints made against the company.
- Staff General Data Protection (GDPR) must be adhered to and staff personal information kept secure.

5. Supply Chain Management

Delmore as part of its labour standards review and annual audit will ask suppliers to provide any information which shows the improvements in quality and labour standards which they have achieved during the last 12 months.

New suppliers will be asked for this information before they become part of Delmore Ltd supply chain and must be able to demonstrate good quality and labour standards on all premises through certificates and factory visits.

Delmore commits to monitoring and maintaining the labour standards in the company's supply chain through the distribution and communication of the company's labour standards policy along with the on-going assessment of whether these standards are being met. New suppliers must meet Delmore Ltd's initial approval which will outline the standards to which the supplier is expected to maintain as part of their contract. The findings of supplier visits shall be noted at the next meeting.

6. Objectives and Targets

To become a progressive, ethical, company and comply with the ETI Base Code.

Encourage suppliers to develop their own labour standards system.

Work towards ensuring all suppliers comply with the ETI Base Code.

7. Emergency/Critical Response

Delmore has identified aspects of the ETI Base Code that are particularly important for meeting minimum levels of labour standards. The Risk Assessment and Critical Control Points have been updated and recorded in the management review meeting.

Delmore Ltd would insist that should a breach of Labour Standards be discovered in the supply chain that the fault would be rectified immediately and before further supplies are accepted. The risk assessment is reviewed at management review meetings.

8. Performance, Monitoring and Measurement

Delmore Ltd is committed to monitoring the performance of the Labour Standards as part of the management reviews, assessing the progress of the programme and setting even higher targets, to ensure the progression against our objectives. Progression of parties in the supply chain shall be measured against the level of compliance with the ETI Base Code.

ETI Base Code

<https://www.ethicaltrade.org/eti-base-code>

Our Standards

The company commits to periodically review the policy in order to continually improve, taking into consideration changes in legislation, and any other requirements to which the company subscribes in order to ensure the adequacy, suitability and continuing effectiveness of the policy. Specifically, the policy will be routinely reviewed at the company meetings and will be integrated within its' QMS.

Child Labour

Child Labour Child labour shall not be used. If the company engages any young workers (e.g., for work experience) it will ensure that a suitable risk assessment is completed, that the young workers are not exposed to any hazardous conditions and that they will not work more than 8 hours per day. Delmore ensures young workers are not exploited for any illicit activities or work that is dangerous to their health, safety and morals.

Forced and/or compulsory labour

Delmore shall not engage in, or support the use of, forced or compulsory labour, or bonded or involuntary prison labour. We shall not: ---

retain any original identification papers, require personnel to pay 'deposits' upon commencing employment, withhold any part of any personnel's salary, benefits, property, or documents to force such personnel to continue working for us, allow any employment fees or costs to be borne in whole, or in part, by our employees.

Delmore supports the principle that all personnel have the right to leave the workplace premises after completing their standard workday and are free to terminate their employment provided that they give reasonable notice.

Delmore does not engage in, or support, human trafficking.

Freedom of Association and right to collective bargaining

Freedom of association is respected and Delmore shall comply with applicable legislation in this regard. All persons shall have a right to form, join and organise trade unions of their choice and to bargain collectively. Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace. Delmore shall respect this right and there will be no negative consequences or retaliation. Delmore shall prohibit any discrimination, harassment, or intimidation against any staff engaged in collective bargaining.

Discrimination

Delmore shall not engage or support discrimination in hiring, remuneration, access to training, promotion, termination, or retirement based on race, national or territorial or social origin, caste, religion, disability, gender, sexual orientation, family responsibilities, marital status, union membership, political opinions, age, or any other condition that could give rise to discrimination. Delmore shall not allow any behaviour that is threatening, abusive, exploitative, or sexually coercive, including gestures, language, and physical contact, in the workplace.

The company has an equal opportunities and diversity policy which is shown to all new employees at induction.

Working conditions and Health & Safety

Delmore will ensure that our facilities comply with applicable workplace health and safety regulations. We will ensure that ventilation, cleanliness, space, light and temperature are adequate and that there are appropriate welfare facilities. Delmore shall take effective steps to prevent potential accidents and injury to employees health by minimizing, so far as is reasonably practicable, and in co-operation with its employees, the causes of hazards inherent in the workplace.

Responsibility for Health & Safety is assigned to the Director.

Personal protective equipment will be supplied free of charge to employees where such protection is appropriate. Employees shall receive health and safety training during induction and on a regular basis thereafter, Employees will have access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided. Qualified first aiders are trained, and their training is updated on a regular basis, Fire wardens are trained, and their training is updated regularly.

Delmore endorses that all personnel have the right to remove themselves from imminent serious danger without seeking permission. No harsh or inhumane treatment is allowed. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited

Working Hours

Delmore shall comply with applicable laws, collective bargaining agreements (where applicable) and industry standards on working hours, breaks and public holidays.

The Company's normal working hours do not exceed 48 hours per week, and overtime hours do not exceed 12 hours per week. The company ensures all employees have the legal right to be employed in the UK.

Wages and Benefits

Wages and benefits paid for a standard working week shall be equal to or greater than the National Living Wage. All employees 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. Employees will be informed of holiday entitlement, paid sick days, medical leave and overtime at induction. Deductions from wages as a disciplinary measure shall not be permitted. All disciplinary measures will be recorded and will be carried out in a fair and transparent manner in accordance with Delmore's disciplinary procedure.

Reporting Grievances

Delmore has and shall maintain a formal process for reporting grievances which allows issues and concerns about working conditions, and other work-related matters to be raised to management

Disciplinary Practices

The company shall treat all employees with dignity and respect. The company shall not engage or tolerate the use of corporal punishment, mental or physical coercion or verbal abuse of personnel. No harsh or inhumane treatment is allowed.

Respect for human rights

We are committed to working proactively with our manufacturing base and supply chain to ensure that the welfare of workers and labour conditions meet the principles of the conventions of the International Labour Organisation and the elements of the Ethical Trading Initiative (ETI) “Base Code”: -----

Employment is freely chosen,
Freedom of association and the right of collective bargaining are respected,
Working conditions are safe and hygienic,
Child labour shall not be used,
Living wages are paid,
Working hours are not excessive,
No discrimination is practiced,
Regular employment is provided,
No harsh or inhumane treatment is allowed.

Delmore takes a due diligence approach in determining if the organisations we trade with are operating in accordance with local laws and regulations and these international norms.

Delmore recognises the risks associated with operating a diverse supply chain and in particular acts of slavery and human trafficking. Delmore takes a zero-tolerance approach to such criminal activities.

Delmore commits itself to practical and sustainable improvements to worker welfare and conditions whilst considering the diverse social groups which exist within our supply chain.

Equal Pay

Employees of any gender will receive equal pay for doing 'equal work'. This is work that equal pay law classes as the same, similar, equivalent or of equal value. To reduce the risk of inequality of pay we shall; --

Maintain up to date job descriptions that accurately describe the work done,
Make sure that employees, regardless of gender, who do the same work do not have different job titles,
Be consistent when deciding people's pay and contractual terms and conditions.

Monitoring and Review of Standards

We will monitor our labour standards in the workplace on a regular basis and report on our labour standards annually.

The company has communicated this policy to all its Employees, Homeworkers, Contractors, Sub Contractors and Suppliers worldwide.

Signed Elizabeth Munro (Director) Dated: 11th June 2024