

ANTI-SLAVERY, HUMAN TRAFFICKING, ETHICAL BEHAVIOUR, SOCIAL ACCOUNTABILITY POLICY STATEMENT

Dalau is committed to the best humane workplace practices. Our Goal is to continuously improve our Human Resource policies and procedures through education, training, communication, and employee involvement.

To that end Dalau has identified 12 areas of importance (see list below). The Company commits to management reviews, open communication, policy development, alignment with the SA8000 standard and to Section 54 of the Modern Slavery Act 2015, to comply with all international/national laws and provide a favourable employment environment that respects and understands the needs of its employees.

Dalau requires the same standards from our suppliers and will not knowingly enter into business relationships with any company that does not share these core values. The 12 identified areas are:-

- (1) **Child Labour** – We do not utilize child labour and it supports the SA8000 standard and guidelines on child labour.
- (2) **Forced Labour** – We do not engage in or support the use of forced labour.
- (3) **Health & Safety** – We provide a safe working environment with focus on training, health awareness and accident prevention and to provide personal protective equipment where necessary to protect the individual.
- (4) **Freedom of Association & Collective Bargaining** – We respect the right of employees to join trade unions and to bargain collectively or, if such rights are restricted under law, to facilitate parallel means of free association.
- (5) **Discrimination** – We are committed to ensuring that no employee receives less favourable treatment on the grounds of disability, gender, sex, sexual orientation, marital status, race, colour, nationality, religious beliefs, age or ethnic origin.
- (6) **Disciplinary Practices** – We prohibit corporal punishment, abuse, or harassment by set company procedures.
- (7) **Working Hours** – We comply with applicable laws and industry standards on working hours, defining minimum working hours, over time policy and days off a week.
- (8) **Remuneration / Compensation** – We meet or exceed the minimum wage requirement that provides for basic needs. This includes recompense for times where normal hours are exceeded i.e. Overtime/Bank Holidays.
- (9) **Anti-Slavery** – We will not support or deal with any business knowingly involved in slavery or human trafficking. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the current financial year.
- (10) **Equal Opportunities** – We are committed to providing equal opportunities throughout employment, including in the remuneration, training and promotion of staff.
- (11) **Complaints or Grievances** – We will act promptly to deal with any complaints or grievances raised in respect of any breach of this policy.
- (12) **Supply Chain** – We evaluate and audit our suppliers when deemed applicable and only work with suppliers who are committed to eradication of Slavery and Human Trafficking.

Disclosure

All our personnel are protected from suffering any detriment or termination of employment if they make disclosures that can affect the business.

A "qualifying disclosure" means a disclosure of information that an employee genuinely and reasonably believes is in the public or customers interest and shows that the company has committed a "relevant failure" by:

- Committing a criminal offence;
- Failing to comply with a legal obligation;
- a miscarriage of justice
- Endangering the health and safety of an individual;
- Product Safety.
- Concealing any information relating to any of the above.

If this policy has been invoked for malicious reasons or in pursuit of a personal grudge, then immediate termination of employment or such lesser disciplinary sanction as may be appropriate in the circumstances.

Management Systems

The Company commits to informing all employees of its policy and position on the SA8000 standard and Modern Slavery Act 2015. All employees will be made aware of the Policy. Periodically, the Company will reaffirm its commitment to the SA8000 & Anti-Slavery Policy through management reviews and employee communications such as emails and/or Company Newsletter (where applicable).

Approval:

This statement covers the financial year 1st April 2017 to 31st March 2018.


David. J Sage - Managing Director

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