

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

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| 1 | Purpose | 1 |
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- 1.1 The purpose of this policy is to set out Polyco Healthline’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 Polyco Healthline’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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Polyco Healthline Ltd provides both medical and non-medical protection and hygiene products, for the workplace and home. Our range includes re-usable and disposable gloves, polyethylene, pulp, cotton, paper and workwear products.

We have a global supply chain that has been mapped for both country risk and individual supplier risk. The highest area of risk within our supply chain is within the continent of Asia, where a number of our suppliers are located. Each supplier has undergone an individual risk analysis based on our supplier assessment questionnaire, global labour risk index, external audit and review of evidence.

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| 5 | Policy | 2 - 5 |
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At Polyco Healthline 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).

Polyco Healthline Ltd has implemented the following ethical code of conduct based on the Ethical Trade Initiative base code key principles:

- Employment is freely chosen
- Freedom of association / collective bargaining
- 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

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| <b>Employment is freely chosen:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <ul style="list-style-type: none"> <li>• All employment is freely chosen.</li> <li>• There is no forced, bonded or servitude labour.</li> <li>• Worker-paid recruitment fees, lodging of ‘deposits’ and confiscation of worker original identification documents is prohibited.</li> <li>• Workers are free to leave their employer after reasonable notice.</li> </ul> <p>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.</p> |
| <b>Our Approach:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <p>We have procedures to ensure that staff we employ have detailed contracts and are appraised to ensure that they are not bound and are free to choose employment without penalty. This involves persons employed directly and those through agencies and providers.</p>                                                                                                                                                                                                                                                                                                                                                                   |

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| <b>Freedom of association and the right to collective bargaining:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <ul style="list-style-type: none"> <li>• All staff are entitled to belong to trade unions and collective bargaining is respected, to the extent permitted by local law.</li> <li>• The employer is required to adopt an open attitude towards the activities of trade unions and their organisational activities.</li> <li>• Worker’s representatives are not discriminated against and have access to carry out their representative functions in the workplace.</li> <li>• 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.</li> </ul> |
| <b>Our Approach:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <p>Freedom of association and information from collective groups / unions is a crucial part of our improvement process. We wholly support two-way communication as it allows us to grow and provide a stable and engaged workplace. Suggestion and reporting mechanisms are encouraged, alongside committee’s and workplace surveys. It is one of our values to foster a culture of open communication where we can share ideas and concerns, and together find improvement and solutions.</p>                                                                                                                                                                                                                             |

**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.

**Our Approach:**

We safeguard the health and wellbeing of staff at work and those who may be affected by our workplace (visitors, contractors). We have a health, safety and risk management system which includes workplace and COSHH risk assessments, site specific working rules and guidelines, comprehensive training and incident management procedures. Clean hygiene facilities are maintained by our facilities team and sanitary products are provided as part of our commitment to the former 'Bloody Good Employer' scheme. Each employee is provided with a company handbook detailing our policies, access to our benefits and wellbeing portal (Hapi platform) and access to various wellbeing seminars and mental health first aiders.

**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.

**Our Approach:**

Polyco Healthline Ltd classifies a child as any person less than 15 years of age unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age shall apply. If, however, local minimum age law is set at 14 years of age in accordance with developing country exceptions under ILO Convention No. 138, the minimum age will be considered 15. All persons employed by us are verified for age and right to work. Child labour is strictly prohibited and young worker risk assessments are conducted for those who have reached minimum school leaving age but are under the age of 18. Our policy on child labour remediation ensures that any child worker found shall be afforded the appropriate protection required.

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| <b>Living wages are paid:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <ul style="list-style-type: none"> <li>• Wages are fair and comparable and at a minimum meet, national legal standards or industry benchmark standards, whichever is higher.</li> <li>• 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.</li> <li>• Deductions from wages as a disciplinary measure shall not be permitted.</li> </ul>                                                                                                                                                                                                                               |
| <b>Our Approach:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <p>We follow the legally mandated national living and national minimum wage that is set by the government. The real living wage is a separate voluntary rate that is calculated by the Living Wage Foundation; we have undertaken a programme to annually review the real living wage recommendations against our wage structure.</p> <p>Pay grades are benchmarked and established for the specific role and skills required.</p> <p>Deductions from wages may be made under certain circumstances; these are outlined in our company handbook for instance income tax, national insurance, electric car salary sacrifice scheme. We do not deduct wages as a form of disciplinary measure.</p> |

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| <b>Working hours are not excessive and will not exceed any employment legislation</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <ul style="list-style-type: none"> <li>• Working hours must comply with national laws.</li> <li>• 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.</li> <li>• The total hours worked in any seven day period shall not exceed 60 hours, except were covered by the clause directly below.</li> <li>• Working hours may exceed 60 hours in any seven day period only in exceptional circumstances where all of the following are met:             <ul style="list-style-type: none"> <li>» this is allowed by national law.</li> <li>» this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce.</li> <li>» appropriate safeguards are taken to protect the workers' health and safety.</li> <li>» the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.</li> </ul> </li> <li>• 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.</li> </ul> |
| <b>Our Approach:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <p>Employees are provided with written agreement that state their conditions of contract; this includes working hours, holiday allowance and rate of pay.</p> <p>Full time hours are varied depending on the role (35 or 37.5 or 40 hours per week). Overtime when available, is offered, however, the total hours do not exceed 60 unless under exceptional circumstances that would normally be associated with a business continuity incident.</p> <p>Holiday allowance is based on 25 days per year increasing to 30 after 5 years' service. Bank holidays are additional.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

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| <b>No discrimination is practiced.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <ul style="list-style-type: none"> <li>• 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.</li> <li>• Human rights (Human Rights Act 1998) are respected, and workers are provided the means to report grievances to management.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Our Approach:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <p>Equality, Inclusion and Diversity is a principle part of our company culture. We value people as individuals with diverse opinions, cultures, lifestyles and circumstances. All job applicants, employees and workers (including agency workers) are covered by this policy and it applies to all areas of employment including recruitment, selection, training, career development, and promotion. These areas are monitored to ensure that no unfair or unlawful discrimination, intentional, unintentional, direct or indirect, overt or latent exists.</p> <p>The Company is committed to creating a harmonious and safe working environment, which is free from harassment and bullying and in which every employee is treated with respect and dignity. To support these principles we provide various training programmes, seminars and feedback processes.</p> |

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| <b>Regular employment is provided:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <ul style="list-style-type: none"> <li>• To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.</li> <li>• 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.</li> </ul> |
| <b>Our Approach:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <p>When necessary we do employ agency workers; these make up less than 5% of the workforce and where possible will lead to full employment. We also undertake apprenticeships that culminate in employment.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

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| <b>Discipline.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <ul style="list-style-type: none"> <li>Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.</li> </ul>                                                                                                                                                                                                                                                                                                                                    |
| <b>Our Approach:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <p>Harassment, bullying and discipline can take many forms, all of which are not tolerated. We have specific policies, training and reporting mechanisms that are set forth in our company handbook.</p> <p>We ensure that staff have a clear understanding of what harassment, bullying, discipline and victimisation is and how they can report incident. Further support is available by contacting our employee assistance programme, a confidential 24-hour telephone counselling service, which is accessed through the Hapi platform.</p> |

**Additional principles:**

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| <b>No bribery, corruption, blackmailing or bullying is permitted.</b>                                                                                                                                                                                                                                                                                                                                                                                     |
| <ul style="list-style-type: none"> <li>Bribery and corruption are widespread global issues that affect countries regardless of their economic standing. They pose serious risk to security, economic prosperity, reputation, and undermine the rules of law, and shall be prohibited.</li> </ul>                                                                                                                                                          |
| <b>Our Approach:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <p>We are committed to the prevention of bribery by those employed and associated with us and are committed to carrying out business fairly, honestly and openly, with zero-tolerance towards bribery. Our company handbook sets forth the company policy on bribery, gifts and hospitality, and whistle-blowing policies.</p> <p>We have an anti-bribery officer and business ethics reporting mechanism, as detailed in section 7 raising concerns.</p> |

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| <b>Good environmental stewardship is practiced.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <p>Responsibility for environmental quality shared by all those whose actions affect the environment.</p>                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Our Approach:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <p>We are certified to ISO 14001 and our pH Ambition program represents our transformative journey toward a thriving, healthy world, where wellbeing and shared values are at the heart of everything we do.</p> <p>We have a carbon reduction plan and work with Enistic to better understand our carbon footprint as we strive for Net Zero by 2045. Further information can be found on our website <a href="https://www.polycohealthline.com/sustainability">https://www.polycohealthline.com/sustainability</a>.</p> |

**Supplier Commitment:**

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

Additional information can be found in the Ethical and Social Responsibility statement PH-TLD-039.

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| 6 | Responsibility | 8 - 9 |
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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 Papaya platform.
- Educating and working with staff, suppliers and contractors to ensure their wellbeing, safety and social compliance.

**6.2 Anti-bribery Officer**

The anti-bribery officer is responsible for:

- The policy is appropriate and implemented across the business.
- Due diligence is conducted throughout the business ethics system
- Receipt and investigation of concerns and reporting to the board.

**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 | 9 - 11 |
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7.1 Polyco Healthline will provide clear routes by which concerns can be raised by employees. These include:

***Internal Routes of Communication:***

- Immediate Manager
- Company HR - [people@polycohealthline.com](mailto:people@polycohealthline.com)
- Company Director
- Through the HR secure drop box located on the internal rear wall of DC5 warehouse.
- For suspected data theft, data breach or exposure of company protected data or sensitive data then please immediately contact our Data Protection Officer (Ric Chapman) through Email at [ric.chapman@polycohealthline.com](mailto:ric.chapman@polycohealthline.com) or by calling 07368 325658
- For suspected phishing or other IT concerns please message IT through email at [support@polycohealthline.com](mailto:support@polycohealthline.com) or by calling extension 2004.

***External Route of Communication:***

Tackling modern slavery in government supply chains guidance PPN 02/23 provides guidance on reporting mechanisms should concerns arise. These steps include:

- a. In the UK, if someone is in immediate danger, report it to the police immediately by dialling 999. A potential victim can then be referred to the National Referral Mechanism.

- b. If there is concern about a potential victim or suspicions about a situation that is potentially exploitive then you can either:
    - i. Call the Modern Slavery helpline on 0800 121 700 or call the Gangmasters and Labour Abuse Authority on 0800 432 0804. If overseas, then the response should be tailored to the local circumstances. The United Nations High Commissioner for Human Rights has produced a list of agencies, programmes, NGOs and foundations who work to counter slavery in high-risk industry sectors and countries ([www.ohchr.org](http://www.ohchr.org)). In some cases, it will be appropriate to contact local government and law enforcement bodies in-country.
    - ii. Call Crimestoppers on 0800 555 111
    - iii. Contact our Head Office to report concerns directly
      - Polyco Healthline business ethics:
        - PH Website: <https://www.polycohealthline.com/contact-us/>
        - PH Telephone: 03333 208 550 (option 5)
        - PH E-mail: [business.ethics@polycohealthline.com](mailto:business.ethics@polycohealthline.com)
      - or independently through Protect (UK whistleblowing charity)
        - 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.
- 7.5 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, the Anti-bribery Officer and the executive team (Chief Commercial Officer, Chief Operations Officer, Chief Business Development Officer).

- Polyco Healthline 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 | 11 |
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This policy is communicated through the following mediums:

- company shared drive / intranet.
- company website ([www.polycohealthline.com](http://www.polycohealthline.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 technical Email address ([technical@polycohealthline.com](mailto:technical@polycohealthline.com)).

**Signature:**



**Place of Issue:**

Bourne, PE10 0DN, UK

**Name:**

Brett Wakeley

**Date of Issue:**

09/02/2026

**Position:**

Chief Commercial Officer

**Date of Review:**

09/02/2026