

## **NEWMAN SCOTT LIMITED**

### **Ethical Purchasing Policy**

Newman Scott's policy is to seek to purchase goods and services which:

- a) are produced and delivered under conditions that do not involve the abuse or exploitation of any persons
- b) have the least negative impact on the environment

Such considerations will form part of the evaluation and selection criteria for all goods and services purchased by Newman Scott.

In addition, Newman Scott will seek alternative sources where the conduct of suppliers demonstrably violates the basic rights of Newman Scott's intended clients and the communities in which it operates, and there is no willingness to address that situation within a reasonable time period.

#### **Purpose**

The purpose of the policy is to

- a) promote good labour and environmental standards in the supply chain
- b) To protect Newman Scott's reputation.

#### **Code of Conduct for Suppliers**

Suppliers adopting this Code of Conduct should commit to continuous improvement towards compliance with the labour and environmental standards specified, both in their own companies and those of their suppliers.

##### **a) Labour standards**

The labour standards in this code are based on the conventions of the International Labour Organisation (ILO).

##### *Employment is freely chosen*

\*There is no forced, bonded or involuntary prison labour.

\*Workers are not required to lodge 'deposits' or their identity papers with the employer and are free to leave their employer after reasonable notice.

##### *Freedom of association and the right to collective bargaining are respected*

\*Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

\*The employer adopts an open attitude towards the legitimate activities of trade unions.

\*Workers 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.

##### *Working conditions are safe 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 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 standards shall assign responsibility for health and safety to a senior management representative.

*Child Labour shall not be used*

- \*There shall be no new recruitment of child labour.
- \*Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her/him to attend and remain in quality education until no longer a child.
- \*Children and young people under 18 years of age shall not be employed at night or in hazardous conditions.
- \*These policies and procedures shall conform to the provisions of the relevant International Labour Organisation (ILO) standards.

*Living wages are paid*

- \*Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmarks, whichever is higher. In any event wages should always be high enough to meet basic needs and to provide some discretionary income.
- \*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.
- \*Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the express and informed permission of the worker concerned. All disciplinary measures should be recorded.

*Working hours are not excessive*

- \*Working hours comply with national laws and benchmark industry standards, whichever affords greater protection.
- \*In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7 day period on average. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

*No discrimination is practised*

- \*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.

*Regular employment is provided*

- \*To every extent possible work performed must be on the basis of a 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 home-working 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.

*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.

## **b) Environmental standards**

Suppliers should as a minimum comply with all statutory and other legal requirements relating to the environmental impacts of their business. Detailed performance standards are a matter for suppliers, but should address at least the following:

### *Waste Management*

\*Waste is minimised and items recycled whenever this is practicable. Effective controls of waste in respect of ground, air, and water pollution are adopted. In the case of hazardous materials, emergency response plans are in place.

### *Packaging and Paper*

\*Undue and unnecessary use of materials is avoided, and recycled materials used whenever appropriate.

### *Conservation*

\*Processes and activities are monitored and modified as necessary to ensure that conservation of scarce resources, including water, flora and fauna and productive land in certain situations.

### *Energy Use*

\*All production and delivery processes, including the use of heating, ventilation, lighting, IT systems and transportation, are based on the need to maximise efficient energy use and to minimise harmful emissions.

## **Operating principles**

The implementation of the Code of Conduct for Suppliers will be a shared responsibility between Newman Scott and its suppliers, informed by a number of operating principles, which will be reviewed from time to time.

### **Newman Scott will:**

1. Assign responsibility for ensuring compliance with the Code of Conduct to a senior manager.
2. Communicate its commitment to the Code of Conduct to employees, supporters and donors, as well as to all suppliers of goods and services.
3. Make appropriate human and financial resources available to meet its stated commitments, including training and guidelines for relevant personnel.
4. Provide guidance and reasonable non-financial support to suppliers who genuinely seek to promote and implement the Code standards in their own business and in the relevant supply chains, within available resources.
5. Adopt appropriate methods and systems for monitoring and verifying the achievement of the standards.
6. Seek to maximise the beneficial effect of the resources available, eg by prioritising the most likely locations of non-compliance.
7. Report progress in implementing the Code annually to stakeholders including staff and suppliers and donors.

### **Newman Scott expects suppliers to:**

1. Accept responsibility for labour and environmental conditions under which products are made and services provided. This includes all work contracted or sub-contracted and that conducted by home or other out-workers.
2. Assign responsibility for implementing the Code of Conduct to a senior manager.
3. Report progress in implementing the Code annually, either by describing actions taken to or by completing a questionnaire, as requested by Newman Scott.

### **Both parties will:**

1. require the immediate cessation of serious breaches of the Code and, where these persist, terminate the business relationship.

2. Seek to ensure all employees are aware of their rights and involved in the decisions that affect them.
3. Avoid discriminating against enterprises in developing countries.
4. Recognise official regulation and inspection of workplace standards, and the interests of legitimate trades unions and other representative organisations.
5. seek arbitration in the case of unresolved disputes.

**Qualifications to the policy statement**

Newman Scott can accept neither uncontrolled cost increases nor drops in quality. It accepts appropriate internal costs but will work with suppliers to achieve required ethical standards as far as possible at no increase in cost or decrease in quality.

**Applicability**

This policy and its principles apply in all areas in which we conduct business

Signed D Smiddy  
Managing Director  
November 2007