

Ethical Trade & Human Rights Policy

(PPP013)



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1 Policy Statement

Papilo has complex supply chains that are dependent on thousands of people nationally and within the EU. As a values based, privately owned business we recognise the need to protect the rights of both the individuals and the communities touched by our trading activities. This policy sets out the ethical standards expected by the company to protect human rights across all our supply chains.

This policy outlines the minimum standard we expect to be in place throughout our supply chains in order to protect human rights. It further outlines our approach to trading fairly.

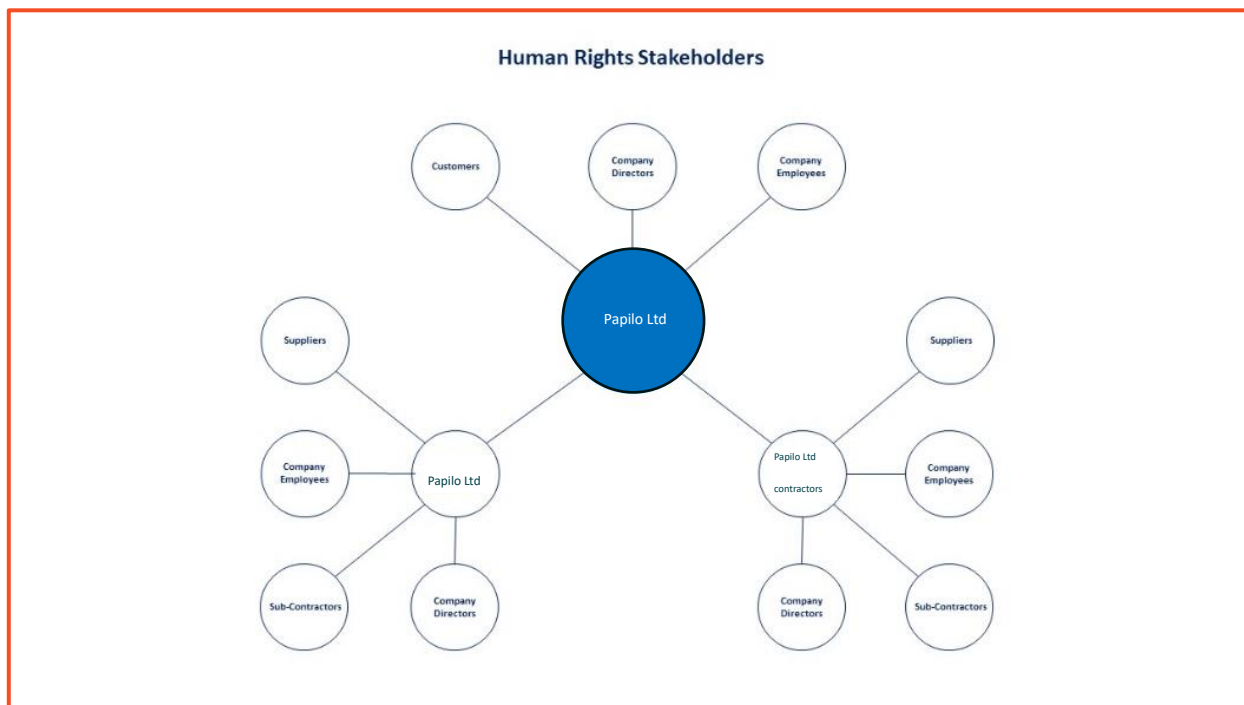
2 Related Policies

This document is part of a broad suite of policies that ensure we treat all our stakeholders in line with our values, whilst minimising the impact our business activities have in the world. It should be read in conjunction with the following Papilo policies:

- Anti-bribery Policy (PPP006)
- Anti-slavery & Human Trafficking Policy (PPP004)
- Corporate & Social Responsibility Policy (PPP012)
- Whistleblowing Policy (PPP016)
- Environmental Policy (PPP002)
- Equality, Diversity & Inclusion Policy (PPP005)
- Child Labour & Remediation Policy (PPP007)
- Sub-contractor Engagement Policy (PPP009)

3 Who this policy applies to

This policy applies to all key stakeholders engaged in our business activities, including directors, employees, agency workers, seconded workers, volunteers, agents, contractors, and suppliers (Please see below).



4 Our sourcing approach

Central to the Papilo way of working is our commitment to developing enduring, mutually beneficial relationships with suppliers who share our values and maintain the highest standards of quality and ethics.

Our approach to sourcing is based on collaboration and we work in close partnership with our suppliers to build long-term sustainable relationships, improve quality and invest in addressing material sustainability challenges. We commit to paying sustainable prices for quality products, based on fair terms of trade.

5 Human Rights

As a minimum standard, our sourcing and supply chain activities ensure that the conventions of the international Labour Organisation (ILO) are adhered to by following the Ethical Trading Initiative (ETI) Base Code. The ETI Base Code is accepted as a global reference standard and is widely used as a benchmark against which to conduct social audits and develop ethical trade action plans. By adopting the ETI Base Code, we commit to the following:

- Employment is freely chosen.
- Freedom of association and the right to collective bargaining are respected.
- Working conditions are safe & hygienic.
- Child labour shall not be used.

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- Living wages are paid.
- Working hours are not excessive.
- No discrimination is practiced.
- Regular employment is provided.
- No harsh or inhumane treatment is allowed.

6 Ethical assurance

As part of our human right's due diligence process, our supply chain is assessed to understand the human rights risks inherent in our supply chain. Based on this risk assessment, several approaches are taken.

Papilo is a member of SEDEX (Supplier Ethical Data Exchange) which is a web-based system for suppliers to share ethical trading information with their customers. Suppliers identified as carrying risks associated with human rights are expected to have ethical processes in place throughout their own supply chains.

It is our requirement that they can (as a minimum) demonstrate compliance with the ETI Base Code and make available and share (on demand) their most recent ethical audit data. Based on our assessment of this data we may require independent ethical audits to be undertaken at appropriate intervals.

If suppliers are found to be in violation of local and other applicable laws and / or Papilo policies, then we reserve the right to take appropriate action. This may include, but not be limited to, the time bound completion of corrective actions, temporary suspension of supply or in some cases, termination of supply. Papilo reserve the right to disengage with suppliers who do not take appropriate measures to remedy non-compliance.

7 Director sign-off

Name	Paul Hodgkiss
Position	CEO
Signature	<i>Paul Hodgkiss</i>
Date	06/02/2024

Document Control

Version	Version Date	Changes By	Version Notes
V1	26/08/2021	MK	Policy implemented
V2	15/06/2023	MK	Review following Palatine investment
V3	06/02/2024	MK	Updated with Papilo branding
V4	15/10/2024	AD	Update to flow chart
V5	07/11/2024	AD	Update to flow chart

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