



Corporate Social Responsibilities

CODE OF CONDUCT – Riventa Ltd

December 2018

Introduction

RIVENTA has created a Corporate Social Responsibility Policy in order to ensure that both its organisation and its suppliers conduct their business in accordance with Industry and internationally approved Standards of good ethical, employment and environmental practice.

The Corporate Social Responsibility Policy is designed to ensure that RIVENTA, its partners and its suppliers operate within the principles and guidelines as laid down in the Policy. The procedures contained in this document ensure that RIVENTA operates best practice in the application of the Policy and ensures that RIVENTA abides by its core principles.

RIVENTA Code of Conduct

RIVENTA is committed to the manufacture and supply of safe, legal products that meet or exceed statutory and customer requirements and that it conducts its business according to the standards of good ethical, employment and environmental practice contained in this policy. RIVENTA expects its suppliers and partners to operate on the same principles.

Specifically, RIVENTA expects its suppliers (and their sub contractors) to observe best practice and continuing improvement in the fields set out below, and in any other areas notified by RIVENTA from time to time.

Scope of Application

This code is to be applied within RIVENTA and to direct suppliers, who in turn will be required to supervise their suppliers and sub contractors in the same terms. RIVENTA accepts that it may be difficult to exert control or influence over small volume or short term suppliers but will take all reasonable steps to ensure compliance within this part of the supply base.

Where RIVENTA deals with large company suppliers (over which it cannot reasonably exert control or influence) which operate their own Social Codes of Conduct, RIVENTA will expect those companies to demonstrate the conformance of their supply base to the company's code. RIVENTA will not necessarily expect these companies to operate to the RIVENTA Social Policy. RIVENTA does not expect companies' codes to apply outside their own scope of reasonable control and influence.

International & National Laws

In applying this code RIVENTA requires adherence to the specific requirements for social accountability as laid out in the International Standard - Social Accountability 8000 (SA8000) and that the following International Instruments (Conventions and Recommendations) be followed:

- ILO Conventions 29 and 105 & Recommendation 35 (Forced and Bonded Labour)
- ILO Convention 87 (Freedom of Association)
- ILO Convention 98 (Right to Organise and Collective Bargaining)
- ILO Conventions 100 and 111 & Recommendations 90 and 111 (Equal Remuneration for male and female workers for work of equal value; Discrimination in employment and occupation)
- ILO Convention 138 & Recommendation 146 (Minimum Age).
- ILO Convention 135 & Recommendation 143 (Workers' Representatives Convention)
- ILO Convention 155 & Recommendation 164 (Occupational Safety & Health)
- ILO Convention 159 & Recommendation 168 (Vocation Rehabilitation & Employment/Disabled Persons)
- ILO Convention 177 & Recommendation 184 (Home Work).

Companies applying this code are expected to comply with national and international laws as applicable and, where the provisions of law and this Code address the same subject, to apply that provision which affords the greater protection.

Each RIVENTA direct supplier shall put in place a system to identify all of the relevant ILO Conventions (& Recommendations), international, national and regional laws and any other requirements referenced by this Code. They will be expected to pass this information onto sub-contractors and suppliers as appropriate.

1. Employment of Appropriate Workers

- a) RIVENTA requires that no forced, bonded or involuntary prison labour be used to produce goods, wholly or in part. Workers shall not be required to lodge deposits, or their identity papers, with their employers.
- b) No worker shall be employed under the minimum age established by local law or the age at which compulsory schooling ends in the country, whichever is the greater. In any event, children under fifteen, or the minimum working age according to International Labour Organisation (ILO) exemptions (under Convention 138), shall not be recruited or employed.

2. General Employment Practices

RIVENTA requires that:

- a) There is compliance with local legislation regulating employment and working conditions.
- b) Employee working hours comply with local legislation and standards and in any event are not regularly more than 48 standard working hours per week. In addition overtime shall not commonly exceed 12 hours per week, shall always be voluntary and shall not be demanded on a regular basis. Each employee is allowed regular rest periods.
- c) Part-time or temporary employment complies with local legislation.
- d) Employees are paid in accordance with local legislation, specifically including any minimum wage, allowances and benefits. All overtime worked shall be paid at premium rates.
- e) All local legislation for sick leave, child care, emergency leave, pregnancy leave, holiday leave and statutory holidays and any similar issues are observed.

3. Working Environment

RIVENTA believes that products should be manufactured in a safe, hygienic working environment. It therefore requires that the working conditions in places of work comply with the following standards:

- a) All national and local health & safety laws and all of the relevant requirements of ILO convention 155. Where the organisation subscribes to other codes of practice or standards on Health & Safety, these shall also be met.
- b) Assigning of a senior management representative to be responsible for health and safety issues.
- c) Establishment of a Health and Safety Committee on which local management, workers and/or their organisations must be represented.
- d) Written health and safety policies shall apply to all work places.
- e) No employees shall be subjected to unhealthy or unsafe working conditions and all necessary safety equipment (including personal protective equipment) should be provided free of charge. Fire exits shall be adequate and well identified.
- f) Young people under 18 shall not be expected to work at night or under potentially hazardous conditions.
- g) No one shall be employed in potentially hazardous conditions without receiving adequate safety training and supervision. First aid training should be provided to nominated First Aiders. A First Aider should be available at all times.
- h) Provision for all personnel of clean bathrooms, access to potable water, and, if appropriate, sanitary food storage facilities.
- i) Where appropriate, employees' living quarters, and food and clothing allowance should be of a standard comparable to that provided by employers locally.

4. Respect for the Individual Worker

- a) RIVENTA requires compliance with management practices which recognise the dignity of the individual and the right to a workplace free of harassment, abuse and corporal punishment. The company shall not allow behaviour including gestures, language and physical contact that is sexually coercive, threatening or exploitative.
- b) Disciplinary practices shall be clearly set out and communicated to workers. They shall not involve the use of corporal punishment, mental or physical coercion and verbal abuse.
- c) Workers shall have the right of appeal and representation at disciplinary hearings.

5. Environmental Standards

- a) Compliance with all relevant environmental standards and legislation requirements.
- b) There must not be any testing or commissioning of tests of finished products or raw materials on animals. There should be no ozone depleting substances in products
- c) RIVENTA is committed to sound environmental practices: it will therefore select suppliers dedicated to making continuous efforts to reduce the impact of their operations on the environment.

6. Corporate Social Responsibility Standards

RIVENTA requires all its suppliers and partners to conduct their businesses in an ethical manner. All suppliers & partners must provide Safe, Legal goods or services that fulfil statutory requirements. No contract will be entered into with any supplier or partner engaged in bribery, kickbacks or the provision of gifts, favours or services to gain a competitive advantage with RIVENTA or any third party.

7. Equal Opportunities

RIVENTA operates an equal opportunities policy. All suppliers must confirm that they do not discriminate in hiring, salary, benefits, advancement, provision of training, termination or retirement (or otherwise interfere with the rights of individuals to observe tenets or practices, or to meet their needs) on the basis of gender, race, religion, caste, age, sexual orientation, disability, union membership, political affiliation, or national or ethnic origin.

8. Freedom of Association & Collective Bargaining

- a) RIVENTA requires all its suppliers to respect the rights of their employees to freedom of association and to organise collective bargaining in a lawful and peaceful manner, in accordance with ILO conventions (87 & 98).
- b) Where the right to freedom of association and collective bargaining is restricted under law the supplier shall facilitate parallel means of lawful independent and free association and bargaining for such personnel.

9. Breach of these conditions

- a) All suppliers and sub contractors are expected to achieve compliance with this code within a reasonable timeframe as agreed by RIVENTA.
- b) It is recognised that observance of some provisions of the code may not be immediately realisable in some cases. Some suppliers may not be able to meet all requirements within a short time and in some cases they may be constrained by national law. Reasonable timeframes and the existence of any constraints not controllable by the supplier may be taken into account by RIVENTA when evaluating compliance. Failure to apply rapid corrective action with respect to certain standards (such as, but not necessarily limited to, the use of forced, bonded or involuntary prison labour, the use of physical abuse or discipline and intimidation) will result in immediate termination of the contract.
- c) Where compliance is not achieved, RIVENTA will no longer continue to place business with this supplier.

10. Responsibility Documentation and Inspection

- a) All suppliers are expected to maintain on file such documentation as may be needed to demonstrate compliance with the requirements of this Code of Conduct.
- b) RIVENTA may conduct audits regularly at all facilities used to produce its components, including the facilities of sub-contractors, to determine whether the requirements set out above have been met.
- c) A named Senior Manager (a member of the board or equivalent) shall be given responsibility for ensuring that these requirements are understood and complied with.
- d) This policy will become part of RIVENTA's Sourcing Terms and Conditions.

Appendix A: Definitions

Child: 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 lower will apply.

Young Person: Any worker over the age of a child as defined above and under the age of 18.

Child Labour: Any work by a child or young person younger than the age(s) specified in the above definitions, which does not comply with the provisions of the relevant ILO standards, and any work that is likely to be hazardous or to interfere with the child's or young person's education, or to be harmful to the child's or young person's health or physical, mental, spiritual, moral or social development.

Responsible for delivery of our CSR vision

A handwritten signature in blue ink, appearing to read 'S Barrett', with a stylized flourish extending to the right.

Stephen Barrett B.Eng (Hons), MBA, MIOD
Managing Director
Riventa Ltd

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