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Corporate Social Responsibility Policy

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Classification: Public

At System Devices UK Ltd, we take our CSR very seriously and have committed to the template provided by the Ethical Trading Initiative to give respect to workers worldwide. We endeavour to ensure that the following policy will be applied by both our own business and any sub-contractors used by us in the course of our business

Note: We make every effort to ensure that this policy conforms to current international laws and best practices and will periodically assess and amend it where necessary to remain compliant.

1 Employment is freely chosen

- 1.1 We do not and will not use forced, bonded or involuntary prison labour.
- 1.2 Our workers are not required to lodge "deposits" or their identity papers with us and are free to leave our employment after reasonable notice.

2 Freedom of association and the right to collective bargaining are respected

- 2.1 Our workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- 2.2 We are open towards and encourage the activities of trade unions.
- 2.3 Worker representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- 2.4 Where the right to freedom of association and collective bargaining is restricted under law, we will facilitate, and will not hinder, the development of parallel means for independent and free association and bargaining.

3 Working conditions are safe and hygienic

- 3.1 A safe and hygienic working environment will always be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps are 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 in the working environment.
- 3.2 Our workers will receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- 3.3 Access to clean toilet facilities and to potable water, and sanitary facilities for food storage will be provided.
- 3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of our workers.
- 3.5 Responsibility for health and safety has been assigned to Martin Wright who sits on our board of directors and reports to board meetings on all health and safety matters. All matters discussed at board meetings are included in the minutes of the meeting.

4 Child labour shall not be used

- 4.1 We will not encourage the use of child labour and will report any child labour witnessed to the appropriate authorities.
- 4.2 Any young person employed by us under age 18 will not be employed at night or in hazardous conditions.

5 Living wages are paid

- 5.1 Wages and benefits paid to our employees for a standard working week meet, at a minimum, national legal standards.
- 5.2 All our workers will 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.
- 5.3 We will not permit deductions from wages as a disciplinary measure without the expressed permission of the worker concerned. All disciplinary measures will be properly documented.

6 Working hours are not excessive

- 6.1 Our working hours will always comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers.
- 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.*
- 6.3 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. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which will not be less than 125% of the regular rate of pay.
- 6.4 The total hours worked in any seven day period will not exceed 60 hours, unless in exceptional circumstances where all of the following are met:
 - this is allowed by national law;
 - this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
 - appropriate safeguards are taken to protect the workers' health and safety;
 - we can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
- 6.5 Our workers will 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.

7 No discrimination is practised

7.1 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.

8 Regular employment is provided

- 8.1 To every extent possible work performed is on the basis of a recognised employment relationship established through national law and practice.
- 8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship will 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 will any such obligations be avoided through the excessive use of fixed-term contracts of employment.

9 No harsh or inhumane treatment is allowed

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation will not be tolerated by any individual in our employ towards any other individual or group whether they also be in our employ or not.