

Responsible Sourcing

The Topps Group Code of Conduct for Suppliers (“the Code”)

Background

The Code, embraces the ETI base code which is founded on the conventions of the International Labour Organisation and its codes of labour practice as referred to in the Appendix.

The Code represents the Groups fundamental expectations of its supplier partners in relation to responsible sourcing. Any business unit within the Topps Group will not knowingly work with any supplier who does not comply and requires all suppliers to acknowledge this Code and confirm their acceptance of its provisions. Compliance will be underpinned by way of contractual obligation and audit process.

The provisions of the Code constitute minimum not maximum standards, and the Code should not be used to prevent suppliers exceeding these standards. Suppliers applying this code are expected to comply with national and other applicable law. Where the provisions of such laws and the Code of practise address the same subject, suppliers are to apply those provisions that afford the greater protection and higher standard.

The Code

Employment is freely chosen

There shall be no forced, bonded or involuntary prison labour. Specific attention is drawn to The UK Modern Slavery Act 2015 and its definitions.

Modern day slavery comes in many forms: -

- Human trafficking – No person should be brought into a situation of exploitation through a series of actions, including deceptive recruitment and coercion.
- Forced labour – No person should be forced to carry out work within an organisation under threat of punishment.
- Bonded Labour – No person should be made to work to pay back a debt or a loan
- Slavery – No person should be able to exercise power of ownership over another person.

Workers shall not be required to lodge “deposits” or their identity papers with their employer. Where identity papers are required for registration / age verification then employers are expected to take copies for reference and return to the original worker.

Any worker shall be free to leave their employment after reasonable notice and shall normally be entitled to a reasonable period of notice on termination of their employment.

Freedom of association and the right to collective bargaining are respected

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

As an employer you should adopt an open attitude towards the activity of trade unions and their organisational activities

Worker’s 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, you should facilitate, and do not hinder, the development of parallel means of independent and free association and bargaining.

Working conditions are safe and hygienic

A safe and hygienic working environment shall be provided, bearing in mind prevailing knowledge of the applicable industries and of any specific hazards relating to them. 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 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.

All factory and accommodation areas must have sufficient fire doors, escape routes, firefighting equipment. All escape routes and exits must be clearly marked and kept clear at all times.

Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage must be provided.

Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

Child Labour should not be used

There shall be no recruitment of child labour. We define “child labour” as a person who is under age 15 (or under 14 in developing countries) or any higher minimum age under local law for leaving school and starting work.

You 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 him or her to attend and remain in quality education until no longer a child.

Children and young persons under 18 shall not be employed at night or in hazardous conditions.

Living Wages are paid

Wages and benefits paid for a standard working must meet, at a minimum, the applicable national legal standards or industry benchmark standards, whichever is higher. In any event, wages should always be enough to meet basic needs and provide some discretionary income.

Where a charge or deduction is made to an employee’s wages, for transport, meals and accommodation the deduction should not be excessive and should be in line with industry norms.

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 they are paid.

Deduction 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 expressed permission of the worker concerned. All disciplinary measures should be recorded.

Working hours are not excessive

Working hours must comply with national laws, collective agreements and the provisions set out in points below, whichever affords the greater protection of workers. Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.





All overtime shall be voluntary. Overtime shall be used responsibly, taking in to account all of 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 be compensated at a premium rate, which is not recommended to be less than 125% of the regular rate of pay.

The total number of hours worked in any seven-day period shall not exceed 60 hours per week except where covered by points 1-5 below.

Working hours may exceed 60 hours per week in any seven-day period only in exceptional circumstances where all of the following are met –

- 1) this is allowed by national law
- 2) this is allowed by collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce
- 3) appropriate safeguards are taken to protect the workers' health and safety and
- 4) the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
- 5) Workers will be provided with at least one day off in every 7-day period or, where allowed by national law, two days off in every 14-day period.

No discrimination is practised

There is no discrimination in hiring, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, 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 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 or verbal abuse or other forms of intimidation shall be prohibited.

A disciplinary process must be in place that complies with all national laws as a minimum. A grievance procedure should be in place for employees to raise their concerns with their employer.

Monitoring

Suppliers must provide details of any factory producing the goods supplied to the Topps Group and ensure that access to the factory is granted should any employee and or representatives wish to visit the factory for the purpose of monitoring compliance to this code. Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.





It is expected that a senior manager is appointed to ensure that all component suppliers are aware of complying with the code.

Inspection and assessment

Topps Group employees or their representatives may undertake inspections at factories or suppliers premises and it is expected that any business within the Topps Group will be provided with all the necessary information to allow the verification of compliance with the Code.

In the event of failure to achieve the standards set out within the code, the Group will work with any suppliers to allow them the opportunity to achieve them within a reasonable period of time as agreed with Topps Group.

We would expect that all corrective actions would be resolved at the end of an agreed timescale. If the expected standards have still not been achieved then Topps Group have the right, dependent upon the severity of the failure to stop trading with the supplier concerned and cancel any orders already placed without penalty to any business within the Group..

Record Keeping

Suppliers must maintain only one set of complete and accurate records of working hours and employee payroll records that represents true working conditions. Under no circumstances should double books be kept and used.

Environment

Suppliers must comply with local environmental laws and legislation. Supplier must also consider the principles of sustainable development in particular the optimum use of raw materials, the efficient use of energy and also minimising the amount of waste as a result of the supply chain and manufacturing process.

Appendix

ILO CONVENTIONS

The Code of Conduct has been drawn up with reference to the International Labour Organisation Conventions and Recommendations listed below:

- ILO Declaration on Fundamental Principles and Rights at Work, 1998
- ILOC 1 Hours of Work (Industry) Convention, 1919
- ILOC 26 Minimum Wage-Fixing Machinery Convention, 1928
- ILOC 29 Forced labour Convention, 1930
- ILOR 85 Protection of Wages Recommendation, 1949
- ILOR 87 Freedom of Association & protection of the Right to Organise Convention 1948
- ILOC 95 Protection of Wages Convention, 1949
- ILOC 98 Right to Organise and Collective Bargaining Convention, 1949
- ILOC 100 Equal Remuneration Convention, 1951
- ILOC 105 Abolition of Forced Labour Convention, 1957
- ILOC 111 Discrimination (Employment and Occupation) Convention, 1958
- ILOR 111 Discrimination (Employment and Occupation) Recommendation, 1958
- ILOC 131 Minimum Wage Fixing Convention, 1970
- ILOC 138 Minimum Age Convention, 1973
- ILOR 146 Minimum Age Recommendation, 1973
- ILOC 155 Occupational Safety and Health Convention, 1981
- ILOR 164 Occupational Safety and Health Recommendation, 1981





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