

HUMAN RIGHTS & LABOUR CONDITIONS POLICY

INTRODUCTION

The Company is committed to protecting the human rights of everyone who works for FTL and all those who have dealings with it. As a responsible company, we support the United Nations Universal Declaration of Human Rights that sets "common standards of achievement for all people and all nations". We recognise that our responsibility for human rights and labour conditions encompasses:

Operating sites Supply chain.

It is our aspiration that the working conditions throughout our supply chain meet internationally accepted standards of human rights and working conditions.

GUIDING PRINCIPLES

This policy on human rights and labour conditions has been developed with reference to the following documents:

- The United Nations Universal Declaration of Human Rights.
- The 8 so-called 'fundamental' labour standards of the International Labour Organisation.

These cover freedom of association; the right to organise and bargain collectively; use of forced labour and equality.

• The UN Convention on the Rights of the Child.

RESPONSIBILITY

We believe that everyone at FTL is responsible for having due regard for human rights. In particular:

- The Directors have overall responsibility for ensuring that human rights considerations are integral in the way in which existing operations and new opportunities are developed and managed.
- Managers and supervisors provide visible leadership that promote human rights as an equal priority to other business issues. They also have a responsibility for identifying abuses that occur
- All employees are responsible for ensuring that their own actions do not impair the human rights of others. They are also encouraged to bring forward, in confidence, any concerns that they may have about human rights abuses.

EFFECTING ACTION

We recognise that from time to time we will encounter challenges on human rights that are bigger than the Company is able to tackle alone. Many human rights abuses are systemic in their host communities. We are therefore committed to working with other organisations that can help us implement this policy effectively over time.

POLICY PRINCIPLES

Child labour

We will not employ workers under the legal minimum age for admission to work stipulated by the laws of the countries where we work and will operate in accordance with ILO conventions No 138 on the minimum age for admission to employment and No 182 on the banning of the worst forms of exploitation of child labour.

Forced labour

In accordance with ILO Conventions 29 on Forced Labour and 105 on the Abolition of Forced Labour, we will not make any use of forced labour, including prison or debt-bondage labour. We will not require the lodging of deposits or identity papers, either by us or agencies providing employees.

Health and safety

We will provide a safe and healthy work environment and take all reasonable steps to prevent death or injury to anyone on our sites. Regular training to all our workers on health and safety issues will be provided. All workers will have access to bathroom facilities and potable water.

Most aspects of health and safety are covered by existing Company policies which are available on the Intranet or employee handbook.

Freedom of association and the right to collective bargaining

We respect the principles of freedom of association and collective bargaining as defined in ILO convention No 87 on the freedom of trade unions and the protection of trade union law and No 98 on the right of organisation and collective bargaining.

Discrimination

In accordance with ILO Convention 111 on Discrimination, we will not discriminate against any person based on race, caste, origin, religion, disability, gender, sexual orientation, union or political affiliation or age. We will not tolerate sexual or racial harassment or bullying. FTL has specific policies on Discrimination/Harassment and Bullying/Victimisation, which are available in the employee handbook.

Discipline

We will not employ, or allow to be employed, any form of corporal punishment, physical coercion or verbal abuse. Any disciplinary matter will be dealt with through proper procedures.

Working hours

Working hours in our businesses, including rest days and holidays are informed by the relevant ILO conventions regarding working hours (including No1on working hours (factories); No 30 on working hours (factories and offices); No 47 on the 40-hour week; No132 on holidays with pay) and prevailing national laws.

Compensation

Wages paid for standard working hours must meet local legally-mandated minimum wage levels. However, they must also be sufficient to meet the basic needs of workers and their families. We will work with reputable local organisations to establish what a 'living wage' is.

Responsibility

Responsibility for the compliance of FTL with this policy lies ultimately with the Directors of the Company. Performance will be reported to the Board by the Managing Director.