Lynn River Limited – Ethical Sourcing Policy

6th September 2023

Introduction:

Lynn River aims to provide its customers with quality products and value for money. In today's global market this means sourcing products from a variety of locations internationally.

Over the past decade there has been increasing awareness by our customers and consumers of working conditions and environmental impacts in factories in developing countries. In order to address these concerns, Lynn River Limited is introducing an Ethical Sourcing Policy to ensure it is:

- Sourcing its products in a responsible manner
- Working with our factories and suppliers to improve their social and environmental practices.
- Providing clear guidance to our buying staff
- Protecting our own reputation and the reputation of individual businesses associated with our brands.

Our Commitment:

Lynn River is committed to upholding human rights, fair working conditions and environmental protection.

In accordance with the expectations of our customers, the wider community and the requirements of the Law, Lynn River endeavours to operate responsibly within the community and we expect the same of our suppliers.

We are committed to working with our suppliers to help improve their labour and environmental practices.

Expectations:

We expect our factories and suppliers to support the ethical standards set out in this Policy with regard to workplace safety, environment and fair employment conditions.

The Policy sets out the standards that we expect all of our suppliers to comply with when producing and supplying products for Lynn River, no matter where they operate in the world. We recognise that full compliance with these criteria may take time for some suppliers. We are committed to working with all of our suppliers to implement improvement plans and help them achieve compliance.

Our suppliers must commit to complying with the following requirements, many of which are drawn from the Ethical Trading Initiative (ETI) and International Labour Organisation (ILO) Conventions. These requirements represent minimum standards based on the principles of the United Nations Universal Declaration of Human Rights.

1. Child Labour:

- Child labour is any form of economic exploitation of a child which involves performing any work which is likely to be hazardous to the safety of the child, interferes with education, or is harmful to the child's health, physical, mental or moral development.
- Lynn River supports ILO Convention No. 138 with regard to the appropriate age of workers and will not work with suppliers who use child labour.
- ILO Convention No. 138 defines minimum age as follows. A child is a person younger than 15 years of age (13 years for light work) or younger than 14 years of age (12 years for light work) in countries where the economy and educational facilities are still being developed. The minimum age for hazardous work is set at 18 years (16 under certain strict conditions).

2. Bonded Labour:
    - Bonded labour refers to a long-term relationship between employee and employer which is cemented through a loan, by custom or by force, which denies the employee various freedoms.
    - Lynn River supports ILO Conventions No. 29 and No. 105 with regards to bonded labour including but not limited to examples such as;
        i. Workers are not allowed to quit their job, or terminate their contract as per legal requirements, or are unable to leave the production facility within the legal framework (e.g. due to slavery and repaying debt).
        ii. Production facility management retain original documents (e.g. ID card, passport, birth certificate) of workers permanently.
        iii. Production facility management retains any monetary deposits or charges, or inappropriate training fees from workers (e.g. payment for PPE).
        iv. Workers not being allowed to leave production facility or dormitory at any time during and after work hours.
        v. Production facility management retains any part of a worker's salary, even if it is in line with the law or agreed by the worker.
        vi. Workers are restricted from access to drinking water or toilet facilities.
        vii. Workers do not receive the right to refuse overtime.

3. Working Conditions
    - A safe and hygienic working environment shall be provided.
    - Adequate steps shall be taken to prevent accidents and injury to health in the working environment.
    - Workers shall receive regular and recorded health and safety training and any such training shall be repeated for new or reassigned workers.
    - Suppliers will ensure that personal protective equipment (PPE) is available and workers are trained in its use. Safeguards on machinery must meet or exceed local laws.
4. Sub-contracting
    - Orders for Lynn River Limited must exclusively be completed in the production facility agreed with Lynn River.
    - There shall be no sub-contracting from agreed factories unless previously agreed with Lynn River Limited.

- Where subcontracting is agreed to, suppliers must have adequate processes in place for properly managing sub-contracting to ensure sub-contractors do not abuse, exploit or provide unsafe working conditions for their employees.

5. Legal Wages
    - Wages and benefits paid for a standard working week meet as a minimum national or industry standards, whichever is the higher.
    - 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.
    - Deductions from wages as a disciplinary measure or any deductions from wages not provided for by Law shall not occur.
    - All disciplinary measures shall be recorded.
6. Working Hours
    - Working hours must comply with applicable local Laws or benchmark industry standards, whichever affords greater protection.
    - Workers must not work above the maximum hours per week as stipulated by local Law.
    - Overtime shall be voluntary and compensated as prescribed by local Law.
7. Harsh or Inhumane Treatment
    - Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
8. Regular Employment
    - To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
    - Employees who have a regular employment relationship with their employer are afforded a number of obligations from their employer relating to labour and social security laws and regulations. These obligations shall not be avoided through the use of labour-only contracting, sub-contracting, home-working arrangements, fixed term contracts or through apprenticeship schemes where there is no real intention to impart skills or provide regular employment.
9. Freedom of Association
    - Workers have a right to join or form trade unions of their own choosing and to bargain collectively.
    - Lynn River expects suppliers and factories to adopt an open attitude towards the activities of trade unions and their organisational activities.
    - Where the right of freedom of association and collective bargaining is restricted under Law, the employer does not hinder the development of alternative means for independent and free association and bargaining.
10. Business Integrity
    - Supplies and production facilities shall engage professional business ethics in all dealings.
    - Lynn River expects suppliers and production facilities to maintain complete, true and accurate records, in relation to production facilities, products

supplied, production status, payments and working hours and must not falsify any record.

- Lynn River will not tolerate any types of bribery or attempted bribery, mental or physical threats or attacks made by suppliers or production facility management towards third party auditors or Lynn River representatives.

11. Environment
    - Suppliers must comply with local and national environmental laws and regulations.
    - Suppliers shall strive to comply with international standards on environmental protection.

Policy Requirements

Lynn River Limited expects and is committed to working in partnership with its suppliers and production facilities to help achieve compliance with all aspects of this Policy. In the event where any supplier is unwilling or unable to demonstrate continuous improvement towards full compliance with our standards, the trading agreement between Lynn River Limited and the supplier will be terminated.



Anthony Griffin

CEO

Lynn River