

# BETTYS & TAYLORS GROUP

A GREAT YORKSHIRE FAMILY BUSINESS

## Ethical Trade and Human Rights Policy

<b>Version:</b>	V2.0
<b>Authorised By:</b>	The Board of Bettys & Taylors Group Ltd
<b>Date Authorised:</b>	2021-12-01
<b>Next Review Date:</b>	2023-12-01
<b>Document Owner:</b>	<b>Modern Slavery Working Group</b>

# Version Control

Version	Date change(s) made	Change(s) made by	Summary of change(s)
V1.0	2020-02-26	N/A	N/A
V2.0	2020-12-03	Susan Turner	Full review, incorporating 'Anti-slavery and Human Trafficking' and 'Trade and conflict'

**Contents**

- 1. Introduction..... Page 4
- 2. Policy objectives / purpose ..... Page 4
- 3. Related policies..... Page 4
- 4. Who this policy applies to..... Page 4
- 5. Our sourcing approach ..... Page 4
- 6. Due diligence & assurance..... Page 5
- 7. Human rights ..... Page 6
- 8. Modern slavery..... Page 6
- 9. Trade & conflict ..... Page 7
- 10. Achieving transparency & working with partners ..... Page 8
- 11. Communication and awareness of this policy ..... Page 8
- 12. Breaches of this policy ..... Page 8

## 1. Introduction

Bettys & Taylors Group Ltd (“BTG”) has complex supply chains that are dependent on millions of people around the globe. As a values-based, family-owned business we recognise the need to protect the rights of both the individuals and the communities linked to our trading activities. This policy sets out the ethical trading standards expected by BTG, to protect human rights across our global supply chains.

## 2. Policy objectives / purpose

This policy outlines the minimum standard we expect to be in place throughout our supply chains to protect human rights and to comply with our legal and moral obligations, especially in consideration of the UK Modern Slavery Act 2015. It further outlines our approach to trading fairly.

## 3. Related policies

This document is part of a broad suite of policies that ensure we treat all our stakeholders in line with our values, whilst minimising the impact our business activities have in the world. It should be read in conjunction with the following BTG policies:

- Anti-bribery & Corruption Policy
- Code of Conduct: Standards for Sustainable Supply
- Environmental Policy
- Purchasing Policy
- Speak Out Policy

## 4. Who this policy applies to

This policy applies to all key stakeholders engaged in our business activities, including directors, employees, agency workers, seconded workers, volunteers, agents, contractors and suppliers.

## 5. Our sourcing approach

BTG’s values and ways of doing business are clearly defined, live strongly across our Group and are recognised as improving the lives of people, communities and the planet. Central to these ways of working is our commitment to developing enduring, mutually beneficial relationships with suppliers who share our values and maintain the highest standards of quality and ethics.

Our approach to sourcing is based on collaboration; we work in close partnership with our suppliers to build long-term sustainable relationships, improve quality, and invest in

addressing material sustainability challenges. We commit to paying sustainable prices for quality products, based on fair terms of trade.

## 6. Due diligence & assurance



BTG Human Rights Due Diligence Approach

It is our intention to identify and confront the risks of human rights abuses, wherever they occur. To do this, we need to increase visibility and deepen our understanding, allowing us to provide more effective remedy and work towards fully equitable supply chains.

Our human rights due diligence approach is based on the UN Guiding Principles which set out best practice for businesses and human rights.

The Guiding Principles are founded on three pillars:

1. Protect – states have a duty to protect, promote and support human rights
2. Respect – companies have a responsibility to respect human rights and “do no harm”
3. Remedy – both must ensure that victims of business-related abuses have access to effective remedy.

Expanding on these pillars we take a six-step approach:

1.		Commit: We make public and internal policy commitments and establish clear targets and Key Performance Indicators (KPIs).
2.		Assess: We map inherent and specific risk in supply chains.
3.		Implement: We develop and apply action plans – working closely with stakeholders to improve standards and reduce supply chain risk.

4.		Remedy: This may relate to a specific instance but also includes targeted development to address underlying, systemic issues through supply chain investment.
5.		Monitor: We monitor progress through continued assessment, audits and checking performance against KPIs.
6.		Communicate: We report on progress and challenges to an agreed frequency.

## 7. Human rights

As a minimum standard, our activities ensure that the conventions of the International Labour Organisation (ILO) are adhered to by following the Ethical Trading Initiative (ETI) Base Code. The ETI Base Code is accepted as a global reference standard and is widely used as a benchmark against which to conduct social audits and develop ethical trade action plans. By adopting the ETI Base Code, we commit to the following:

1. Employment is freely chosen
2. Freedom of association and the right to collective bargaining are respected
3. Working conditions are safe and hygienic
4. Child labour shall not be used
5. Living wages are paid
6. Working hours are not excessive
7. No discrimination is practiced
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed

## 8. Modern slavery

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another, to exploit them for personal or commercial gain.

Bettys & Taylors Group is committed to ensuring that all workers employed by us, as well as those in our global supply chains, enjoy safe and fair treatment in their workplace. We have a zero-tolerance approach to modern slavery and we're committed to:

- implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business, or in any of our supply chains;
- ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our global supply chains and;

- publishing a Slavery and Human Trafficking statement on our website for each financial year in line with our disclosure obligations under the UK Modern Slavery Act 2015.

Responsibility for the prevention, detection and reporting of modern slavery in any part of our business, or our global supply chains falls to all stakeholders. As such, we ask that any concerns or suspicions of modern slavery are raised at the earliest possible opportunity. The mechanisms for reporting are communicated widely, including through our Speak Out Policy and Code of Conduct, while the internal reporting routes are trained as part of role profiles. We are committed to ensuring no one suffers any detrimental treatment because of reporting, in good faith, their suspicion that modern slavery, of whatever form, is or may be taking place in any part of our own business, or in any of our supply chains.

## 9. Trade & conflict

Conflict may include war, acts of terrorism or funding terrorism, gross human rights abuses such as genocide, ethnic cleansing and crimes against humanity. Further to this, the definition of conflict affected regions which is adopted for this policy includes:

- areas in a state of armed conflict;
- fragile post-conflict areas;
- areas with weak or non-existent governance and security, such as failed states;
- in all cases, areas with widespread and systematic violations of international law, including human rights abuses.

Many of the regions we work with are either currently experiencing conflict, at risk of conflict, or in a post-conflict state. We recognise the potential for trade to have a positive and stabilising impact in these areas. Furthermore, the disruption to trade and economic activities resulting from conflict is a key constraint to development. In line with our sourcing approach, our aim is to ensure our trading relationships and operations help promote resilience and we will aim to protect these relationships where possible. However, there are circumstances when trade can have a negative impact and we will not trade with individuals, entities, regions, or countries where any one or more of the following is true:

- UK sanctions have been applied by the Office of Financial Sanctions Implementation.
- Where conflict means that it is not safe for trading partners to continue their operations.
- The international consensus determines that the region or state is illegal.
- The internationally recognised, democratically elected representatives of the region or state call for the suspension of trade.
- Where there is strong, independently sourced data that trade, or the resources being traded are a significant factor contributing to conflict.

By withdrawing trade, we confirm that we will not source from, sell directly to or carry out manufacturing operations with these individuals, entities, regions, or countries. All decisions to restrict or withdraw trade will be a collaborative decision, made in consultation with our trading partners and through seeking expert guidance where appropriate.

## **10. Achieving transparency & working with partners**

To promote transparency, BTG are members of SEDEX (Supplier Ethical Data Exchange) which is a web-based system for suppliers to share ethical trading information with their customers. As determined by our risk assessment process, we also implement a range of mitigation measures in our supply chains. This includes the adoption of third-party certification schemes, completion of Self-Assessment Questionnaires (SAQ), registration with SEDEX and completion of social compliance audits.

Our trading partners are expected to have processes in place to maintain ethical trading compliance throughout their own supply chains and our expectations are detailed in our 'Code of Conduct: Standards for Sustainable Supply'.

In line with our values and sourcing approach, our first route to resolving social and human rights issues is to work both directly with our trade partners and through wider collaborations, to promote change across the sector. We aim to understand underlying causes and address the challenges, rather than take the decision to trade elsewhere. This is reflected in our six-step approach to human rights due diligence.

However, BTG reserve the right to disengage with suppliers who do not take appropriate measures to remedy non-compliance. If suppliers are found to be in violation of local and other applicable laws and/or BTG's policies, then we reserve the right to take appropriate action. This may include, but not be limited to, the timebound completion of corrective actions, temporary suspension of supply or in some cases, termination of supply.

## **11. Communication and awareness of this policy**

Please ensure that you communicate our zero-tolerance approach to modern slavery to all appropriate suppliers, contractors and business partners at the outset of our business relationship with them and reinforce this approach as and when you consider it's appropriate to do so.

## **12. Breaches of this policy**

We will take any breaches of this policy seriously and any employee who breaches this policy may face disciplinary action. We may decide to end our relationship with other individuals and organisations working on our behalf if any of their actions conflict with this policy.