

LABOUR STANDARDS POLICY

April 2020

The Promotions Factory Ltd (the **Company**) is an independent media communications agency that has its main office in London, UK.

The Company acknowledges its obligations towards its employees, stakeholders and the communities in which it works, and has outlined below its policy in relation to labour standards.

This policy is relevant to the Company itself, our contractors, sub-contractors, suppliers, freelancers, members of the public and other parties engaged with the Company's business.

MINIMUM LABOUR STANDARDS

The Company has identified the following compelling reasons to establish a comprehensive system of minimum labour standards to guide its business operations:

- 1. Ethical Responsibilities** - the Company acknowledges its obligations towards its employees, stakeholders and the communities in which we work and operate. The Company wishes to carry out work and to do business in an ethical fashion.
- 2. Adverse Publicity and Damage to the Company's Reputation** – adverse publicity from the discovery of poor labour standards within the Company's business operations presents reputational and structural risks to the Company not only in terms of revenue, but also in respect of staff recruitment and retention. Poor labour standards can also lead to a loss of trust and confidence with suppliers and also within the wider community. The Company therefore wants to do what is right and be seen to do what is right.
- 3. Reduced Quality of Service** – the Company recognises that there is commonly a link between poor labour standards and poor quality of services. To this end, it is in the interest of the Company to ensure that the Company reaches and exceeds minimum labour standards requirements at all times.

To help identify a defined set of minimum labour standards, the Company has referred to the following:

Human Rights Act 1998.

These minimum labour standards are:

- 1. Child Labour** – the Company does not and will not engage in or support the use of child labour. If the Company engages any young workers (e.g. on work experience), it will ensure that a suitable risk assessment is carried out and that young persons are not exposed to any hazardous conditions, or in any case work more than 8 hours per day.
- 2. Forced or Compulsory Labour** – the Company shall not engage in or support the use of forced or compulsory labour, or bonded or involuntary prison labour. Employees are free to leave after providing reasonable notice in line with their individual contracts of employment.
- 3. Health and Safety** – the Company shall provide a safe and healthy workplace environment and shall take effective steps to prevent potential accidents and injuries to employee's health by minimising, so far as is reasonably practicable, and in co-operation with its employees, workers and other members of staff, the causes of hazards inherent in the workplace. All employees will receive safety and job specific health and safety instructions during the course

of their employment with the Company. Employees shall have access to clean sanitary facilities and drinking water.

4. **Freedom of Association** – freedom of association is respected and the Company will comply with UK and the Republic of Ireland labour relations legislation (as appropriate) in this regard.
5. **Discrimination** – the Company shall not engage in or support any discriminatory practices in recruitment, remuneration, access to training, promotion, termination or retirement based on gender (including gender reassignment), marital status, family status, religious belief, disability, age, racial grounds (race, colour, nationality or ethnic origin, including membership of the traveller community), sexual orientation or other conditions that could give rise to discrimination. The Company has in place an Equal Opportunities Policy and a Dignity at Work Policy both of which are provided to all new employees at induction.
6. **Disciplinary Practices** – the Company shall treat all employees and members of staff with dignity and respect. The Company shall not engage in or tolerate the use of corporal punishment, mental or physical coercion, harassment, intimidation or verbal abuse of personnel. No harsh or inhumane treatment is allowed and the Company shall ensure that no disciplinary procedure is operated except as per the Company's Disciplinary Policies.
7. **Working Hours** – the Company shall comply with applicable laws and industry standards on working hours and holiday entitlements. The Company's normal working hours do not exceed 48 hours per week, and overtime hours do not exceed 12 hours per week, with the relevant periods of rest similarly observed. The Company ensures that all employees have the legal right to be employed in the UK or the Republic of Ireland (as appropriate).
8. **Remuneration** - the Company shall comply with national laws and regulations with regard to wages and benefits. All work-related activities are carried out on the basis of a recognised employment relationship established according to national law and practice. All members of staff are remunerated in a way which is in excess of the national minimum wage in the UK or the Republic of Ireland as is appropriate.

The Company also commits to:

- Compliance with relevant legal and other requirements to which the Company subscribes;
- Ensuring that all our key contractors, sub-contractors and suppliers are aware of this policy; and
- Making available sufficient resources for the implementation of this policy.

Review

The Company commits to periodically reviewing this policy in order to continually improve labour standards within the workplace. The Company shall take into consideration: changes in legislation, legal advice as necessary and any other requirements to which the Company subscribes, to ensure the adequacy, suitability and continuing effectiveness of this policy.

The Company will make this policy available to its employees in the first instance, and also to all contractors, sub-contractors and suppliers.