

DWP_5-11 Dworkin® Social Compliance Policy and Procedures Manual

Dworkin® ISO 9001: 2015 Documentation

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1. Introduction – Social Compliance & Responsibility

Dworkin® as a company and its Directors are absolutely committed to ethical practices consistent with the International Labour Organisation (ILO) core conventions and also operating in a safe and healthy manner, with consideration for the environmental impacts of our activities and of course the performance of the business in meeting customer requirements. Ethical business practices are also implemented including prohibited activities related to bribery and corruption.

Given the above, Dworkin® has adopted a Code of Conduct which applies to our own business but also those who work with us, including suppliers. This Code of Conduct is summarised as:

- Prohibiting any form of forced labour or trafficking (referred to as Modern Slavery)
- Prohibiting the use of child labour
- Prohibiting charging of recruitment fees to workers
- Prohibiting the with-holding of worker identity or immigration documents
- Requiring that workers are provided with a safe and healthy working environment
- Workers are engaged in compliance with applicable employment laws and codes of practice including working hours
- Permitting freedom of association and the right to collective bargaining
- Prohibition of bribery and corruption

Additionally, we are committed to developing and maintaining an Environmental Management System which identified our environmental impacts and promotes control where appropriate, compliance and continual improvement.

This manual document sets out the related procedures which are intended deliver and ensure compliance to the above commitments but within Dworkin® but also our supply chain.

Ultimate responsibility for our related Policies, Procedures and their implementation rests with the Directors and specifically the CEO.

2. Policy

Dworkin® has developed, maintained and implemented a wide range of relevant policies which include:

- Modern Slavery, Human Trafficking and Labour Policy
(DWP_5-7 Dworkin® Modern Slavery and Human Trafficking Policy Statement)
- Anti-bribery and Corruption Policy
(DWP_5-1 Dworkin® Anti-Bribery & Anti-Corruption Policy)

The above policies are approved by the Directors and subject annual review to ensure their continued relevance and adequacy.

Additionally the company has developed a detailed Employee Company Handbook for employees which details all other procedures and policies that employees need to be aware of which includes details of their statutory rights.

All policies are made available to staff internally where appropriate in their first language. Additionally the Modern Slavery, Human Trafficking and Labour Policy is made publicly available to interested parties on request and via the company website.

3. Employment – Recruitment and Selection

Recruitment and selection processes will be conducted in a fair and equitable manner consistent with the Equality Act or local equivalent.

Children of compulsory school age will not ever be employed by Dworkin® either direct or through any third party or agency. The age and Right to Work will be verified during the recruitment process and records retained as evidence.

Dworkin® will ensure that it ensures compliance with its own Code of Conduct and policies for those it employs. Bonds and deposits will not be sought from employees and originals of passports or right to work evidence shall not be retained by the company.

The use of agency staff will be avoided and if every used, the agency provider treated as high risk and subject to specific requests for information including through Supplier Questionnaire and potentially site audits to review agency procedure and adherence to the Code of Conduct and local law.

Induction will include communications of policies and procedures related to environmental, health & safety and other social compliance policies as well as the content with the Employee Company Handbook all of which are accessible during employment.

HR are responsible for ensuring compliance of all recruitment, selection and induction processes as well as on-going compliance to local laws during employment.

4. Discrimination, Harassment and Retaliation

Dworkin® is opposed to discrimination of any kind the basis of (but not limited to) race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership, ethnic/national origin, military status or political affiliation. Policy and procedures along with grievance processes are clearly defined in the company's Employee Company Handbook.

A clear and concise Anti Bullying and Harassment Policy is available for all Dworkin® Employees. This policy clearly lays out what is bullying and harassment and also provides a complaints/grievance procedure should this be required. The policy is published for all to read both on the company website and also on the Dworkin® Album, (/Dworkin Internal/ISO Documentation/Dworkin Internal Policies and Rules) the Dworkin Album is a hub used to store all Dworkin® company policies. The anti bullying and harassment policy is labelled as shown below.

DWP_(5)-10 Dworkin® Anti Bullying and Harassment Policy

5. Terms and Conditions of Employment plus Wages and Benefits

All terms and conditions of employment will be defined within the Contract of Employment which will be provided in writing to all employees and which will meet the requirements of local law including working hours and wages (this will also include details of any lawful deductions). Other than for changes in salary, variations to the terms and conditions of employment will also be confirmed in writing.

Employees will be provided with written wage statements/slips.

HR are responsible for ensuring the effective issue of all statements of terms and conditions.

6. Working Hours

Employees working hours will not exceed those defined by local law and specifically the Working Time Directive. Employees who are 18 and over do have the option to opt out of the 48 hour working week (averaged over 17 weeks) however this is not obligatory on any employee and the decision to opt out may be revoked subject to the appropriate notice period of 3 months. Under 18's will not be permitted to opt out and their working hours instead limited to not more than 40 hours per week and 8 hours per day.

Additionally working hours shall not exceed those specified by the WCA Guidelines or other applicable requirements.

All overtime is voluntary and paid at the prevailing rate which is compliant with local law.

The Accounts and Finance Assistant is responsible for monitoring working hours for all employees (unless exempted under the Working Time Directive) and for reporting any exceedance to a Director so that corrective and preventative action can be taken.

7. Child Labour

Dworkin® is totally opposed to the exploitation of children and use of child labour. Minimum age of employment according to local law is verified as part of the recruitment and selection process.

Employees younger than 18 years old will be subject to reduced working hours as detailed in section 6 and shall not work nights or carry out activities which may be harmful to them. All employees under 18 shall be subject to a specific health & safety risk assessment which will consider aspects such as their maturity and awareness of workplace risks.

Those who work with us including suppliers are required to comply with our Code of Conduct and Modern Slavery, Human Trafficking and Labour Policy which included prohibition of child labour. In the event of any identified breach, timely remediation and corrective action will be taken as detailed below. Such actions must include the child attending schooling where they are of compulsory school age

HR and all managers are responsible for implementation of this procedure for employees/workers of Dworkin®. Supply chain compliance is the responsibility of the Managing Director and Accounts & Finance Assistant.

Dworkin® have a specific Modern Slavery and Human Trafficking Policy (DWP_5-7 Dworkin® Modern Slavery and Human Trafficking Policy Statement).

The above policy is available both on the company website and also on the Dworkin Album (<https://album.dworkin.eu/> /Dworkin Internal/ISO Documentation/Dworkin Internal Policies and Rules).

8. Health and Safety

Dworkin® will identify applicable Occupational Health & Safety (OH & S) laws applicable in each country where they operate and ensure compliance to these laws. In practical terms this will translate into risk identification, risk assessment, elimination of risk and or workplace procedures and controls including safe systems of work. All aspects of the company's OH & S shall be subject to a periodic planned review but also when changes occur for example in equipment, processes, materials or substances used.

Employees and those working with us onsite and offsite will be provided with appropriate guidance, training, resources and equipment to ensure a safe and healthy working environment for all.

Dworkin® has a fully developed and concise Health and Safety Policy.
(DWP_5-5 Dworkin® Group Health and safety Policy).

The above policy is available both on the company website and also on the Dworkin® Album
(<https://album.dworkin.eu/> /Dworkin Internal/ISO Documentation/Dworkin Internal Policies and Rules).

In addition to the above policy Dworkin® have a qualified NEBOSH IGC representative who is available for help and advice with regard to all matters Health and Safety (Michael WILLIAMSON).

9. Bribery and Corruption

Bribery or corruption is not tolerated within Dworkin® in our supply chain. An appropriate Policy is published internally any breaches being investigated through company Disciplinary Procedures.

Should any issues be identified within the Supply Chain, corrective action will be taken by our procurement department. It is vital that when using our suppliers, both current and future that due diligence is carried out by Dworkin® to ensure that our equipment is sourced from viable and responsible sources.

Dworkin® has a fully developed and concise anti bribery and anti corruption policy.
(DWP_5-1 Dworkin® Anti-Bribery & Anti-Corruption Policy)

The above policy is available both on the company website and also on the Dworkin® Album
(<https://album.dworkin.eu/> /Dworkin Internal/ISO Documentation/Dworkin Internal Policies and Rules).

10. Supply Chain Management

As part of our ISO 9001 commitment, every year, we conduct a risk assessment of our supply chain by taking into account:

- The risk profile of individual countries based on the Global Slavery Index
- The business services rendered by the suppliers
- The presence of vulnerable demographic groups
- A news analysis and the insights of labour and human rights groups

This assessment will determine our response and the risk controls that we implement.

Based upon risk, those who work with Dworkin® including suppliers will be required to confirm their commitment to our Code of Conduct and Modern Slavery, Human Trafficking and Labour Policy and also required to provide evidence of implementation including within their own supply chain.

Suppliers will be subject to review and may periodically be asked to complete again the Supplier Questionnaire and declaration to comply with our Code of Conduct.

Dependent upon risk and information provided by suppliers, we may implement additional screening including supplier visits and reviews of the suppliers own control systems and actions to prevent prohibited activities.

Should a breach relative to our policies and Code of Conduct being identified as part of this screening process or at any stage, remediation and corrective action will be taken as detailed below.

The Accounts and Finance Assistant is responsible for implementation of this procedure.

11. Environmental Management

Dworkin® recognises its activities have an environmental impact and therefore maintains an Environmental Management System (EMS), the core of which is based on an Environmental Aspects and Impacts Assessment which in turn leads to the development of controls and procedures to minimise and reduce those impacts during normal, abnormal and emergency situations.

The CEO will be responsible for ensuring that the EMS is established and adequately implemented.

Dworkin® has a fully developed and concise environmental policy.

(DWP_5-4 Dworkin® Environmental Policy)

The above policy is available both on the company website and also on the Dworkin® Album (<https://album.dworkin.eu/> /Dworkin Internal/ISO Documentation/Dworkin Internal Policies and Rules).

12. Remediation, Corrective and Preventive Actions

In the event that any non-conformities (including Social Compliance, Environmental or OH & S) or breaches are identified whether within Dworkin® or the supply chain, remediation or other corrective action will be taken. All such non-conformity will be recorded within the management system and root cause analysis completed where appropriate to establish any preventive actions. However in all cases timely corrective action will be taken to prevent further non-conformity and/or reduce the impact of that non-conformity.

In the cases of breached relative to the Code of Conduct including within the supply chain, actions may as appropriate include:

- a. Remediation, providing guidance to the supplier in how best to resolve the matter with a positive outcome for those who may be affected. For child labour breaches this must include establishment of schooling where the child is of compulsory school age. We will seek to achieve acceptable performance and compliance of the supplier
- b. Where acceptable performance and compliance cannot be achieved or where the risk and impact on affected people is too great as a result of the breach, we may decide to cease using that supplier until such time as they achieve performance to the Code of Conduct.
- c. Employees within Dworkin® may be subject to guidance and refresher training however where this is a clear conduct issue, managed through the company disciplinary and performance procedures.
- d. In all instances, further monitoring will be implemented to ensure the effectiveness of actions taken.
- e. Where appropriate the appropriate authorities may be informed of breaches in legislation.

The CEO is ultimately responsible for ensuring implementation of this policy including the effectiveness of corrective & preventive actions.

13. Performance and Evaluation

So as to promote continual improvement we will as part of our management systems, establish objectives and targets in respect of Social compliance, environmental and OH & S performance. Objectives will be set as and when opportunities are identified and at management review. A plan for the achievement of objectives will be established and review of the extent to which they have been achieved also monitored.

As appropriate monitoring of key performance indicators will also be established which may include:

- Non-conformities relative to the Code of Conduct
- Health & Safety incidents including 'accidents'
- Resource use (e.g. energy)
- Supply chain performance

Additionally, a Management Review will be conducted annually to review performance of the management systems including Social Compliance, Policies, non-conformity and opportunities for improvement including on the Code of Conduct and its implementation.

14. Table of Ammendments

Name of Amender	What was Amended	Date of Amendment
Michael WILLIAMSON	Change of entire document to new Dworkin® font design	14.01.2020
Michael WILLIAMSON	Checked document for viability	14.01.2020
Michael WILLIAMSON	Checked document for viability	18.01.2021
Michael WILLIAMSON	Checked document for viability	12.08.2022
Michael WILLIAMSON	Checked document for validity and viability	26.01.2023
Michael WILLIAMSON Martin KRIVY	Checked document for validity and viability	03.01.2024
Michael WILLIAMSON	Changes made to front cover	27.02.2025