

Supplier Code of Conduct Policy

The Metal Window Company Limited T/A The Rooflight Co.

1. INTRODUCTION

Operating with integrity governs our approach and therefore our aspiration is to be recognised by our customers, suppliers, and co-owners as a responsible organisation in all our relationships.

We expect our suppliers to share our commitments and approach and we state below guidelines that we require of all our suppliers. We expect them to adhere to the guidelines and to confirm in signing up to this code that they expect these requirements also of their supply chain, including sub-contractors.

By collaborative working we believe we can jointly have a positive impact on society.

May 2022

2. LAWS & REGULATIONS

Suppliers will comply with all applicable local and national laws, rules, regulations, and requirements in the provision of products and services manufactured and provided to The Metal Window Company Ltd (T/A the Rooflight Company). It is the supplier's responsibility to maintain and enforce these standards within its own supply chain.

3. UNDERAGE LABOUR

Suppliers shall ensure that no underage labour has been used in the production or distribution of goods and services to The Metal Window Company Ltd. A child is any person under the minimum employment age according to the laws of the country where the product (or parts of) or services are sourced from, or in the absence of law under the minimum age for completed mandatory education.

4. FORCED LABOUR

Suppliers will not use or tolerate in their supply chain any form of slavery, servitude, indentured, bonded, involuntary prison, military or compulsory labour or any form of human trafficking.

All work must be conducted voluntarily and without threat of any penalty or sanctions.

No employee government issued identification, passports or work permits will be retained by the supplier as a condition of employment.

Workers' rights to leave the workplace after their shift or to terminate their employment after reasonable notice and receive owed salary must be recognised by the supplier. This applies to local or migrant employees.

Suppliers are asked to report to The Metal Window Company Ltd any incidents of slavery or human trafficking found in its business or supply chain.

5. FREEDOM OF ASSOCIATION

Suppliers shall respect the rights of workers to associate or not to associate with any group, as permitted by and in accordance with all applicable local and national laws and freedom of association and collective bargaining. Suppliers shall not interfere with or discriminate against workers choosing to belong to them.

Where the right to freedom of association and collective bargaining is restricted under national law, suppliers will facilitate, not hinder, alternative means of independent and free association and bargaining.

6. DISCRIMINATION

An inclusive and diverse work environment is encouraged, with equal opportunities for all workers.

All employees must be treated fairly and not discriminated against in any form of employment.

Suppliers must not discriminate against any employee based on age, gender, sexual orientation, race, ethnicity, colour, disability, religion, political affiliation, union membership, national origin, marital or pregnancy status during any recruitment or employment activities.

Suppliers must commit to a workforce free of any harassment or threat of harassment. Any forms or threats of harassment, physical, mental, sexual or verbal, must be prohibited and not tolerated.

7. WAGES & BENEFITS

Wages and benefits must meet legal minimums and industry standards without unauthorised deductions.

8. WORKING HOURS

Suppliers must ensure working hours comply with national laws and standards and should not expect workers to work (including overtime) in excess of hours set out in relevant working time legislation or other national legal limits unless an opt out has been chosen by the employee with appropriate supporting written evidence.

9. WORKING CONDITIONS

Suppliers must provide safe and clean conditions for workers at sites of working and residential facilities. Clear procedures must be in place to ensure regulated occupational health, safety and wellbeing standards are adhered to. Suppliers must comply with the The Metal Window Company Ltd's Health and Safety policy.

10. ENVIRONMENT

Suppliers must have clear procedures in place to ensure direct and indirect environmental impacts associated with the goods and services are understood, measured and managed. Suppliers must comply with the The Metal Window Company Ltd's Environment policy.

11. BUSINESS INTEGRITY

Suppliers shall not engage in any form of bribery or corruption or undertake any action that contravenes The Metal Window Company Ltd's Anti-Bribery and Corruption policy.

12. DISCIPLINE & GRIEVANCE

Suppliers must provide a grievance mechanism for workers and their organisations to enable workers to anonymously raise workplace concerns. The mechanism must be transparent, set out clearly how grievances will be assessed and feedback provided. Workers and their representatives must be informed clearly how the scheme operates and its scope and that it is equally accessible to all workers.

Disciplinary procedures shall be clearly documented, communicated and easily accessible to all workers. All disciplinary matters shall be recorded including evidence that the worker knew and understood what he/she was accused of and given the right to trade union or other appropriate representation at disciplinary meetings which may lead to significant disciplinary penalties or dismissal.

13. COMPLIANCE WITH CODE

Suppliers must be able to demonstrate compliance with The Metal Window Company Ltd's Supplier Code of Conduct. This includes documented evidence and the right of The Metal Window Company Ltd or a designated firm to conduct audits. Audits to include facility inspections, review of supplier records business practices and conducting employee interviews.

14. REPORTING CONCERNS

In relation to 2. to 13. above suppliers are invited to report any area of concern to The Metal Window Company Ltd.