

## Palmer Timber Ethical Code of Conduct

### Introduction

Palmer Timber is a privately owned timber importer/distributor, based in the West Midlands, United Kingdom.

Our timber division has a large modern milling facility which enables us to produce both standard and customer special mouldings to a very high standard from our considerable range of Scandinavian Redwood and Whitewood, Clear Softwoods from North and South America and Hardwoods from around the world.

Our Panel products division carries upwards of 2000 items ex stock, encompassing a wide range of products including MFC, MFMDf, Decorative Laminates, Veneered MDF, Chipboard, Plywood, Standard and MR MDF and Hardboard. We are also one of the UK's major suppliers of 38mm Mezzanine Flooring.

### Our Approach to Modern Slavery and Human Trafficking

Slavery and Human Trafficking remains a blight on our global society. We all have a responsibility to be alert to the risks in our business and in the wider supply chain. We are committed to improving our practices to combat slavery and human trafficking.

We are committed to ensuring that there is no modern slavery or human trafficking being practiced in our supply chain or in any part of our operations. The way we conduct our business, our employment policies and our processes all reflect our commitment to acting ethically and with integrity.

As part of our initiative to identify and mitigate the risk of Modern Slavery & Human Trafficking we have:

- Systems in place to encourage the reporting of concerns and the protection of whistle-blowers.
- Zero tolerance to modern slavery and human trafficking and we therefore expect all those in our supply chain, including our contractors, to comply with our Code of Conduct for suppliers, given below.

## Our Code of Conduct

### 1 - Transparency

- Palmer Timber Limited are committed to providing transparency throughout their operations and ensure all suppliers in the supply chain do likewise.

Using our Supplier Questionnaire, Palmer Timber Limited ensure that:

- Suppliers accept unannounced audits of their supply chain, and their sites should it be deemed necessary
- At a minimum all companies in the supply chain must comply with local law

## **2 - Freedom of Employment**

- Palmer Timber Limited do not use any form of slave, forced, bonded, indentured, or involuntary prison labour, nor are they be engaged in exploitation or human trafficking, or import goods tainted by slavery or human trafficking.
- All personnel have the freedom to accept or leave a job voluntarily.
- Employees are not required to pay "deposits" or leave their identity papers with Palmer Timber and are free to leave their employment after reasonable notice.
- Palmer Timber Limited shall ensure that policies, systems and procedures are in place to ensure compliance with this clause. Training will be provided to relevant managers and employees.

## **3 - Freedom of Association & the Right to Collective Bargaining**

- Palmer Timber Limited respect the rights of their employees to associate or not to associate with any group, as permitted by law.
- All of Palmer Timber Limited's employees will have the right to associate or not associate with any group of their choice, as permitted by law without fear of reprisal, intimidation, or harassment.
- All of Palmer Timber Limited's employees will have the right to form, join and organise trade unions of their choice.
- In situations where the right to freedom of association and collective bargaining are restricted under law, Palmer Timber Limited shall allow employees to elect their own representatives freely.
- Palmer Timber Limited will ensure that union members, representatives of employees and any personnel engaged in organising employees are not subjected to discrimination, harassment, intimidation or retaliation for being union members, the representative(s) of employees or involved in organising employees and that such representatives have access to their members in the workplace.

- Palmer Timber Limited will ensure that policies, systems, and procedures are in place to ensure compliance with this clause. Training will be provided to relevant managers and employees.

#### **4 - Working Conditions**

- Palmer Timber Limited will provide a safe and hygienic workplace environment.
- Palmer Timber Limited will appoint a senior management representative to be responsible for ensuring a safe and healthy work environment for all personnel and for implementing this Standard's Health & Safety requirements.
- Palmer Timber Limited will provide and shall take adequate steps to prevent potential health & safety incidents and occupational injury, or illness arising out of, associated with or occurring in the course of work. It shall minimise or eliminate, as far as is reasonably practicable, the causes of all hazards in the workplace environment.
- Palmer Timber Limited will provide personnel with appropriate personal protective equipment (PPE) as needed when hazards remain after adequate minimisation or elimination of the causes of all hazards in the workplace environment and the supplier.
- Palmer Timber Limited will assess all the workplace risks to new, expectant and nursing mothers including those arising out of their work activity, to ensure that all reasonable steps are taken to remove or reduce any risks to their health & safety.
- In the event of a work-related injury, Palmer Timber Limited will ensure that correct procedures are in place and that employees are adequately trained to provide first aid.
- Palmer Timber Limited will ensure that all personnel receive regular and recorded health & safety training, and such training shall be repeated for new or reassigned employees.
- Palmer Timber Limited will provide, for use by all personnel, free access to clean toilet facilities, potable water, suitable spaces for meal breaks, and, where applicable, sanitary facilities for food storage.
- All personnel will have the right to remove themselves from imminent danger without seeking permission from Palmer Timber Limited.
- Palmer Timber Limited will provide access to medical assistance and emergency services in the case of workplace injury.
- Palmer Timber Limited will provide adequate regularly updated fire procedures and safeguards for its employees.

## 5 - Child Labour & Young Employees

- Palmer Timber Limited will not engage in or support the use of child labour as defined below.
- Child labour is defined as any person under the minimum employment age according to the laws of the facility's country, or, in the absence of regulation, under the minimum age for completing required education. UK law defines child labour as 'work that deprives children of their childhood, their potential and their dignity, and that is harmful to their physical and mental development' (House of Commons 25/11/2008). If the country's minimum working age is either not defined or younger than 15, Palmer Timber Limited, their suppliers, facilities and subcontractors within their supply chain shall not employ anyone younger than 15. Underage labour is not to be used to produce or distribute goods or services. Underage labour laws protect children and benefit communities.
- Palmer Timber Limited will develop, document, maintain and effectively communicate to all employees and other interested parties, written policies and procedures for remediation of child labourers, and shall provide adequate financial and other support to enable such children to attend and remain in school until they are no longer a child as defined above.
- Palmer Timber Limited may employ young employees, but where such young employees are subject to compulsory education laws, they will work only outside of school hours.
- Palmer Timber Limited will ensure that under no circumstances shall any young employee's school, work and transportation time exceed a combined total of 10 hours per day, and in no case shall young employees work more than 8 hours a day.
- Young employees are not permitted to work during night hours.
- Palmer Timber Limited will not expose children or young employees to any situations, inside or outside of the workplace that is hazardous or unsafe to their physical and mental health and development.
- Palmer Timber Limited will ensure that policies, systems and procedures are in place to ensure compliance with this clause Training will be provided to all relevant managers and employees.

### Definitions:

**Child:** Any person less than 15 years of age. If local minimum age law stipulates a higher age for work or mandatory schooling, the higher age applies.

**Young Person:** Any employee over the age of a Child (as defined above) and under the age of 18.

## **6 - Wages and Benefits**

- Palmer Timber Limited will ensure that employees are compensated according to the law including minimum wage, overtime, and premium pay.
- Palmer Timber Limited will ensure that personnel receive equal pay for equal work without discrimination.
- Palmer Timber Limited will ensure that no deductions are taken from employees pay as part of any disciplinary action.
- Palmer Timber Limited will ensure that employees' wages and benefits compositions are detailed clearly and regularly to them in writing for each pay period.
- Palmer Timber Limited will lawfully render all wages and benefits due in a manner convenient to employees, but in no circumstances in delayed or restricted forms, such as vouchers, coupons or promissory notes.
- Palmer Timber Limited will ensure that policies, systems and procedures are in place to ensure compliance to this clause. Training will be provided to all relevant managers and employees.

## **7 - Working Hours**

- Palmer Timber Limited will comply with applicable laws, collective bargaining agreements (where applicable) and industry standards on working hours, breaks and public holidays. The regular work week, not including overtime, shall be defined by law but shall not exceed 48 hours.
- Palmer Timber Limited will ensure Working hours, excluding overtime, is defined by the contract, and shall not exceed 48 hours per week. All working hours will be governed by the conditions of the Working Time Directive (EU 2003/88/EC) and Working Time Regulations 1998 (UK).
- Palmer Timber Limited will ensure all overtime is voluntary and that overtime shall be used responsibly, taking into account all the extent, frequency and hours worked by individual employees and the workforce as a whole.
- Palmer Timber Limited will ensure that policies, systems and procedures are in place to ensure compliance to this clause. Training will be provided to all relevant managers and employees.

## **8 - No Discrimination**

- Palmer Timber Limited will ensure that the working environment provided is free from discrimination.

- Palmer Timber Limited will not discriminate in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
- Palmer Timber Limited will not interfere with the exercise of employees rights to observe tenets or practices or to meet needs relating to race, national or social origin, religion, disability, gender, sexual orientation, family responsibilities, union membership, political opinions or any other condition that could give rise to discrimination.
- Palmer Timber Limited will not subject employees to pregnancy or virginity tests under any circumstances.
- Palmer Timber Limited shall ensure that policies, systems and procedures are in place to ensure compliance to this clause, with training to relevant management and employees.

### **9 - Regular Employment**

- Palmer Timber Limited will only employ people who are legally authorised to work in their location and facility and have a process for validating employees' eligibility to work status through induction documentation
- Palmer Timber Limited will ensure that all work performed is on the basis of a recognised employment relationship established through employment law and practice.

### **10 - No Harsh or Inhumane Treatment**

- Any physical, verbal or threatening abuse, harassment in any form, including intimidation and unethical disciplinary actions, will not be tolerated.
- Palmer Timber Limited has established a written grievance procedure that is confidential, unbiased, non-retaliatory and accessible and available to personnel and interested parties to make comments, recommendations, reports or complaints concerning the workplace
- Palmer Timber Limited will have procedures for investigating, following up on and communicating the outcome of complaints concerning the workplace and/or non-conformances to this standard or of its implementing policies and procedures. These results will be freely available to all personnel and, upon request, to interested parties.
- Palmer Timber Limited will not discipline, dismiss or otherwise discriminate against any employees or interested party for providing information on compliance or for making other workplace complaints.

## **11- Environmental**

- Palmer Timber Limited will comply with the requirements of local and international laws and regulations including having necessary permits.
- Palmer Timber Limited will, as a minimum, meet the requirements of local and national laws related to environmental standards.
- Palmer Timber Limited will, where it is a legal requirement, be able to demonstrate that they have the relevant valid permits for the use and disposal of resources, e.g., water, waste and air emissions etc.
- Palmer Timber Limited will produce an environmental policy, covering their environmental impact and processes to reduce that impact, which is communicated to all appropriate parties, including its own supply chain.

## **12 -Workforce, Subcontractors Agencies & Migrant Labour**

- There will be no sub-contracting by suppliers unless previously agreed with Palmer Timber Limited.
- Any Employment Agencies or Subcontractors used will have the legal right to operate as such and only supply employees registered with them.
- All Employment Agencies and subcontracted suppliers must meet the same criteria as directly contracted product and service suppliers.
- Palmer Timber Limited will ensure that third-party agencies, recruitment firms, labour brokers and subcontractors comply with legal employment practices. All standards also apply to temporary employees as well as regular employees.
- Palmer Timber Limited will ensure a full understanding of the recruitment process and assess all labour recruiters and intermediaries against legal requirements.
- Palmer Timber Limited will ensure that policies, systems and procedures are in place to ensure compliance to this clause. Training will be provided to relevant managers and employees.
- Palmer Timber Limited will implement processes to enable adequate control over agencies with regards to the above points and related legislation.
- Palmer Timber Limited will ensure that Employment agencies only supply employees registered with them.

- Palmer Timber Limited will ensure employees do not pay any recruitment fees at any stage of the recruitment process.

#### **14 – Anti-Bribery and Corruption**

- Palmer Timber Limited undertake to comply with all applicable laws and regulations governing the prevention and fight against bribery and corruption. In particular, Palmer Timber Limited require that their directors, officers, agents, subcontractors, partners, affiliates and/or employees shall not commit any act or omission that would constitute a breach or an offence under anti-bribery laws. Any violation of anti-bribery rules will constitute a right to terminate the relationship without compensation.

#### **Supplier Compliance**

- Trading with Palmer Timber Limited depends upon full compliance with this code by its suppliers. Failure to comply with any part of this code may result in the termination of the Supplier's trading relationship with Palmer Timber Limited and the immediate cancellation of all outstanding orders without compensation.
- **Records:** Palmer Timber Limited will maintain transparent and up-to-date records to demonstrate compliance with applicable materials, services, governmental, industrial and environmental regulations as per applicable law. Traceable quality data will be available on request for a period as defined in the applicable law.
- Palmer Timber Limited agrees that any non-compliance issues raised by regular audits and inspections will be disclosed and a timetable for the rectification of these points will be implemented to ensure full compliance.

**Name:** Richard Palmer

**Position:** Managing Director

**Signature:**

A handwritten signature in black ink, appearing to read 'R Palmer', with a long horizontal flourish extending to the right.

**Date:** 6<sup>th</sup> May 2022