Title: **VALLEY PROVINCIAL LTD MODERN SLAVERY POLICY**

Sub Title: **Transparency in the Supply Chain - Ethical Code of Conduct**

Introduction

Valley Provincial Ltd are conscious of the responsibility we share with our subcontractors and suppliers to protect the rights of workers who produce the goods and help provide the services we supply. We seek to develop long-term partnerships with subcontractors and suppliers who share our values and who are prepared to commit themselves to our Ethical code of Conduct which is consistent with internationally agreed conventions on workers' rights.

1. Monitoring our supply chains

We recognise the importance of being aware of labour practices in our supply chains and the need to monitor, evaluate and act on information about our suppliers' performance.

2. Striving for improvement

We recognise that many ethical trade issues can take time and effort to resolve. As a minimum, we require our suppliers to work towards compliance with our Code of Conduct or the local law – whichever provision affords the greater protection to workers. We expect suppliers to work to resolve issues identified in a timely manner and to engage workers' organisations in identifying and resolving issues.

Code of Conduct

The provisions of this code constitute minimum and not maximum standards and this code should not be used to prevent suppliers from exceeding these standards. Companies applying this code are also expected to comply with national and other applicable law.

1. Employment is freely chosen

1.1 There is no forced, bonded or involuntary prison labour.

1.2 Workers are not required to lodge "deposits" or their identify papers with their employer and are free to leave their employer after reasonable notice.

2. Working conditions are safe and hygienic

2.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environments.

1. Child labour shall not be used

1.1 There shall be no recruitment of child labour.

1.2 The minimum age for workers shall not be less than the age of completion of compulsory schooling, not normally less than 15 years. Valley Provincial Ltd suppliers and subcontractors must comply with all legal requirements for the work of authorised young workers, particularly those pertaining to hours of work, wages and safe working conditions. Workers under age 18 must not be employed at night or in hazardous conditions.

1.3 All young workers must be protected from performing any work that is likely to interfere with their education, social, spiritual or moral development.

2. Wages and Working hours

2.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher.

2.2 Working hours comply with national laws and benchmark industry standards, whichever affords greater protection.

2.3 In any event, workers shall not on a regular basis be required to work in excess of 60 hours per week and shall be provided with at least one day off for every 7-day period on average. Overtime shall be voluntary and shall be compensated at a premium rate.

3. No discrimination is practiced

3.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age disability, gender, marital status, sexual orientation or political affiliation.

4. No harsh or inhumane treatment is allowed

4.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidations shall be prohibited.

5. Entitlement to Work

5.1 Only workers with a legal right to work in the country should be employed.

5.2 For both workers and agency workers, original documents should be reviewed and then returned to workers to verify right to work.

6. Labour agencies

6.1 Labour agencies should only supply workers registered with them.

6.2 Relationships with labour agencies should be covered by a Service Level Agreement which meets all national legal requirements.

Monitoring and review

All aspects of this policy are to be reviewed annually.

Signed:

Paul Brown, Managing Director

Date: 16.12.2024

Review date: 16.12.2025