

Scope	All Areas
Purpose	To outline to all affected parties the company's Policy on Labour Standards and Ethics that the company adheres to and in turn requires its Suppliers to adhere to as a contractual obligation
Associated Systems	70090 Bribery and Corruption Policy

Toffeln Ltd is an established supplier of medical footwear and medical-related products based in the UK. Toffeln seeks to develop long-term business partnerships with reputable suppliers. These partnerships can only be successful if suppliers have a mutual respect for our Ethical Standards.

Our relationships with our suppliers are based on our company's commitment to compliance with the UK's [Modern Slavery Act 2015](#) and all laws relating to Labour Standards and Human Rights at all times. Toffeln supports the principles of the [United Nations Global Compact](#), the [UN Universal Declaration of Human Rights](#) as well as the [International Labour Organisation Declaration on Fundamental Principles and Rights at Work](#), in accordance with national law and practice. We believe mutual respect must be extended to everyone in the Supply Chain including employees, sub-contractors and other third parties.

It is an accepted fact that when staff feel 'looked after', this greatly improves worker satisfaction, reduces employee turnover and increases efficiency.

Whilst other countries have legal and cultural differences to the UK, it is essential that all the factories involved in supplying the company meet their local Labour laws and carry out their business practices with good ethics and protection of their workforce.

Detailed below are seven areas of risk that we as a company pledge to stand by and require our Suppliers to stand by and also include their Supply Chain in this:

- 1. Child Labour** - The supplier employs no children under the age of 15. If national laws or regulations allow children between the ages of 13 and 15 to perform light work, such work is not permitted under any circumstances if it would hinder a minor from the completion of compulsory schooling or training, or if the employment would be harmful to their health or development (reference: ILO Convention 138(7)).
- 2. Forced labour** - The use of forced labour or involuntary labour of any kind is not acceptable. Companies that withhold passports of staff or have staff that have outstanding Recruitment Fees paid personally to secure their current job cannot be a supplier of Toffeln.

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3. **Abusive behaviour** - The use of any form of physical abuse to coerce or punish workers is not acceptable. Additionally, the use of non-physical abuse such as threat of violence, sexual harassment or verbal abuse is also not acceptable
4. **Discrimination** – Discrimination against a person or group as a result of race, religion, colour, gender, nationality, age, maternity, marital status or disability is not acceptable.
5. **Health and Safety** - Suppliers must ensure that all working premises comply with all applicable laws regarding working conditions, worker health and safety, fire, safety, risk protection, sanitation, electrical and structural safety.
6. **Compensation and working hours** - Working Hours / days, wages, over-time pay, and holiday pay must be in compliance with all local laws and must meet the legal minimum wage or a wage that meets local Industry standards, whichever is greater.
7. **Improper payments/bribery** - The supplier shall comply with international anti-bribery standards as stated in the United Nations' Global Compact and local anti-corruption and bribery laws including the UK's [Bribery Act 2010](#). In particular, the supplier may not offer services, gifts or benefits to Toffeln employees at a level that may influence the employee's conduct in representing their company.

Our Labour Standards and Modern Slavery system involves regular training of all staff, an Annual Supply Chain Questionnaire, assessing and scoring Suppliers as well as ensuring set Company Objectives for Labour Standards are met. It is regularly reviewed by the company Management and audited by an external auditor. When visiting factories, to increase our due diligence, our staff will often devote time to checking points related to Labour Standards.

We look for cooperation and understanding from new and existing Suppliers in providing requested information to enable us to successfully maintain this system and ensure compliance. Statistics prove that Modern Slavery can occur anywhere in the world and the UK is no exception.

Anyone wishing to report any violation of these standards can email whistleblowing@toffeln.com

Signed for and on behalf of the Company Management:

Jim Leflaive

Jim Leflaive, IT & Systems Manager

7th April 2025

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