

70050 Toffeln Labour Standards (Modern Slavery) & Ethical Procurement Policy

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 require Suppliers to adhere to these 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, subcontractors 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.

Where suppliers are identified as higher risk due to country, sector or other factors, Toffeln may require additional due diligence and confirmation that our Labour Standards Policy is adhered to as part of contractual arrangements.

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.

Toffeln also seeks to ensure its purchasing practices do not place undue pressure on suppliers that could increase labour standards risks within the supply chain.

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. Suppliers must not retain worker passports or identity documents and must ensure that workers are not required to pay recruitment fees or similar costs to obtain employment.
- 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.

Approved by:	Jim Leflaive	Issued Date:	13/03/2026
Version:	2.2	Review Date:	12/03/2027

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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. Workers should also have the ability to raise concerns or grievances through appropriate channels or worker representation mechanisms regarding working conditions or labour standards without fear of retaliation, in accordance with local laws.
6. **Compensation and working hours** – Working hours/ days, wages, overtime 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. Workers should be provided with a written employment contract in a language they understand outlining their terms of employment, wages and working hours.
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.

Labour Standards Management System

Our Labour Standards and Modern Slavery system involves regular training of all staff, the use of a Supplier Labour Standards Questionnaire, assessing and scoring Suppliers based on risk factors such as country, sector and available labour standards information, as well as ensuring set Company Objectives for Labour Standards are met.

We also monitor Key Performance Indicators relating to Labour Standards and Modern Slavery risks as part of our ongoing review process.

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.

Where appropriate, Toffeln may also provide guidance or communicate relevant expectations to suppliers to support their understanding of Modern Slavery risks and Labour Standards requirements.

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

All reports of suspected breaches will be reviewed and investigated in accordance with company procedures.

Signed for and on behalf of the Company Management:

Jim Leflaive

Jim Leflaive, IT & Systems Manager
13th March 2026

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