



SOURCING WITH HUMAN DIGNITY

UNIVERSAL CABLES LIMITED

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We expect all our Value Chain Partners to meet the Mandatory Requirements benchmarks and to work towards, and over time meet the Continuous Improvement Benchmarks for Good Practices and Best Practices. We will work to recognise and reward Value Chain Partners who strive to reach these highest levels of responsible sourcing.

I. MANDATORY REQUIREMENTS FOR DOING BUSINESS WITH UCL

These are the mandatory requirements that Value Chain Partners must adhere to in order to establish and maintain a business relationship with UCL:

Business is conducted lawfully and with integrity

a. Bribery

There is a prohibition of any and all forms of bribery, corruption, extortion or embezzlement and there are adequate procedures in place to prevent bribery in all commercial dealings undertaken by the Value Chain Partner.

b. Conflicts of Interest

All and any conflict of interest in any business dealings with UCL, of which the Value Chain Partner is aware, will be declared to UCL to allow UCL the opportunity to take appropriate action. Any ownership or beneficial interest in a Value Chain Partner's business by a government official, representative of a political party or a UCL employee is declared to UCL before any business relationship with UCL is entered into.

c. Competition and Competitor Information

All information about UCL's competitors is obtained legitimately and will only be used for legitimate purposes in compliance with all relevant antitrust and other laws and regulations. No attempt is made at any time to divulge to UCL, any information about UCL's competitors that is confidential to them and not in the public domain.

d. Financial Records, Money Laundering and Insider Trading

All business and commercial dealings are transparently performed and accurately recorded in the Value Chain Partner's books and records. There is no actual or attempted participation in money laundering. No confidential information in the Value Chain Partner's possession regarding UCL is used to engage in or support insider trading.

e. Gifts, Hospitality and Entertainment

Any business entertaining or hospitality with UCL is kept reasonable in nature, entirely for the purpose of maintaining good business relations and not intended to influence in any way the decisions about how UCL awards future business. Gift giving between Value Chain Partner's employees and UCL's employees is avoided. Official company to company gift exchanges are acceptable but must be transparent and properly recorded.

f. Safeguarding Information and Property

UCL's confidential information, know-how and intellectual property are respected and safeguarded. All information provided by UCL is only used for its intended and designated purpose. All and any personal information about individuals, such as UCL's consumers or employees are handled with full respect for the protection of their privacy and for all relevant privacy laws and regulations.

g. Product Quality and Responsible Innovation

Products and services are delivered to meet the specifications and quality and safety criteria specified in the relevant contract documents and are safe for their intended use. Research and development are conducted responsibly and based on good clinical practice, and generally accepted scientific, technological and ethical principles.

h. Compliance with Laws

All laws and regulations are complied with in the countries in which the Value Chain Partner operates. All other applicable international laws and regulations are complied with including those relating to international trade (such as those relating to sanctions, export controls and reporting obligations), data protection and anti-trust/competition laws.

II. Reporting Concerns and Non-retaliation

1. Employees are provided with means by which to raise their concerns about any of these requirements and all employees who speak out about an issue are protected from retaliation.
 2. Work is conducted on the basis of freely agreed and documented terms of employment Policies are adopted and adhered to that respect workers, permanent and casual and, at a minimum, safeguard their rights under their employment contract, local, national labour and social security laws and regulations, and applicable collective agreements.
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3. All workers are treated with respect and dignity. No worker is subject to any physical, sexual, psychological, verbal harassment, abuse or other forms of intimidation. There is no discrimination in employment, including hiring, compensation, advancement, discipline, termination or retirement. Discrimination based on caste, national origin, ethnicity, religion, age, disability, gender, marital status, sexual orientation, union membership, political affiliation, health, disability or pregnancy is prevented. In particular, attention is paid to the rights of workers most vulnerable to discrimination.
 4. Work is conducted on a voluntary basis. Forced labour, whether in the form of indentured labour, bonded labour or other forms, is not acceptable. Mental and physical coercion, slavery and human trafficking are prohibited.
 5. All workers are of an appropriate age. Under no circumstances will a Value Chain Partner employ workers under the age of 15 or under the minimum age for work or mandatory schooling as specified by local law, whichever is higher. When young workers are employed they must not do work that is mentally, physically, socially or morally dangerous or harmful or interferes with their schooling by depriving them of the opportunity to attend school.
 6. All workers are paid fair wages. Workers are provided with a total compensation package that includes wages, overtime pay, benefits and paid leave which meets or exceeds the legal minimum standards or appropriate prevailing industry standards, whichever is higher, and compensation terms established by legally binding collective bargaining agreements are implemented and adhered to.
 7. Working hours for all workers are reasonable. Workers are not required to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. All overtime work by workers is on a voluntary basis.
 8. All workers are free to exercise their right to form and/or join trade unions or to refrain from doing so and to bargain collectively. The rights of workers to freedom of association and collective bargaining are recognised and respected. Workers are not intimidated or harassed in the exercise of their right to join or refrain from joining any organisation.
 9. Workers' health and safety are protected at work.
 10. Workers have access to fair procedures and remedies Workers are provided with transparent, fair and confidential procedures that result in swift, unbiased and fair resolution of difficulties that may arise as part of their working relationship.
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11. Land rights of communities, including indigenous peoples, will be protected and promoted. The rights and title to property and land of the individual, indigenous people and local communities are respected. All negotiations regarding their property or land, including the use of and transfers of it, adhere to the principles of free, prior and informed consent, contract transparency and disclosure.

12. Business is conducted in a manner that embraces sustainability and reduces environmental impact. A healthy and safe workplace is provided to prevent accidents and injuries arising out of, linked with, or occurring in the course of work or as a result of the employer's operations. Operations, sourcing, manufacture, distribution of products and the supply of services are conducted with the aim to protect and preserve the environment.
