

SOCIAL COMPLIANCE POLICY

1. POLICY STATEMENT

1.1 Employees of Turner Coachways Ltd represent the company and are expected to act in a manner that will enhance its reputation. This policy applies to all persons working for us or on our behalf in any capacity, including; employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives and business partners (collectively referred to as "Employees").

2. ABOUT THIS POLICY

2.1 Social Compliance is a continuing process in which organisations endeavour to protect the health and safety and rights of; employees, the community in which we operate, the environment in which we operate and the lives and communities of workers in our supply and distribution chains. The Association of Professional Social Compliance Auditors define Social Compliance as "Looking at wages and benefits, labour rights, discrimination against gender or vulnerable groups, health and emergency planning". Social Compliance may also be referred to as sustainability, which includes ethics (or the treatment of people and animals), the environment, and the economy.

2.2 All employees will be provided with training on Social Compliance.

3. SCOPE

3.1 This policy applies to employees, contractors, consultants, temporaries, and all other workers for Turner Coachways Ltd, including all personnel affiliated with third parties.

4. RESPONSIBILITY FOR THIS POLICY

4.1 All managers have an overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

4.2 Turners Coachways has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective.

4.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training.

4.4 This policy has been endorsed by management at all levels.

5. OBJECTIVE

5.1 The objective of the social compliance audit is to ensure that: Working conditions are in compliance with local country laws.

5.2 No serious infractions are being committed by locations that produce Turner Coachways or it's clients products or materials.

- 5.3 In the event that local country laws are different from the Turner Coachways compliance standards, Turner Coachways expects all locations to meet whichever is more stringent.
- 5.4 Our Social Compliance Policy aims to improve both our social and environmental impact in the communities that we do business with throughout the world. While Turner Coachways Ltd recognises that there are different legal and cultural environments in which we operate, the company's Social Compliance Policy sets forth the basic requirements all locations must meet in order to do business. Turner Coachways strongly encourages contractors, agents, and suppliers to exceed the Code of Conduct requirements and to promote best practices and continuous improvement throughout. Our goal is to use the Code of Conduct and audit results as an integral part of our supply chain strategy, influencing how we work now and in the future.
- 5.5 Carry out periodic assessment in order to identify improvement opportunities.
- 5.6 Turners Coachways will conduct appropriate and preventative steps to stop a recurrence of any similar social compliance problem.

6. PRINCIPLES

- 6.1 Turner Coachways Ltd ensures the following for all employees:
 - 6.1.1 Compensation & Benefits: Turner Coachways Ltd shall provide wages, overtime compensation and benefits at not less than the minimum levels required by applicable laws and regulations or which are consistent with the prevailing local industry levels, whichever is higher. If local laws do not provide for overtime pay, suppliers will pay at least regular wages for overtime work.
 - 6.1.2 Working Hours: Turner Coachways Ltd shall maintain employee work hours in compliance with the local standards and applicable laws of the jurisdictions. If local and/nor national regulations regarding the number of maximum overtime hours that may be worked by individual workers do not exist, then the working hours should not regularly exceed 60 hours per week consisting of a maximum of 48 hours of regular hours and 12 hours of overtime. One day off in every seven days should be given. Turner Coachways will not use suppliers who regularly require workers to work hours in excess of the statutory requirements.
 - 6.1.3 Child Labour: Turner Coachways respects the right of children to development and education. Exploitation of child labour is totally unacceptable. No person shall be employed at an age younger than the legal minimum age for working, 16 years of age. Employment of any individual below 16 years of age is strictly prohibited. In general, all employees under the age of 18 must: not be employed in hazardous work; must not work night shifts; and are entitled to more breaks than adults.
 - 6.1.4 Forced Labour: The use of forced or involuntary labour will not be tolerated by Turner Coachways. Turner Coachways will not work with suppliers who

directly or indirectly use in any manner forced labour, indentured labour, bonded labour or prison labour.

- 6.1.5 Human Trafficking: Turner Coachways Ltd shall maintain and commit to maintaining a work environment that is free from human trafficking. Turner Coachways Ltd will not tolerate employment practices that include the recruitment, transportation, transfer, harbouring or receipt of persons or through the use of force or the threat of force or through other forms of coercion, abduction, fraud, deception, abuse of power or by giving or receiving payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.
- 6.1.6 Non-discrimination, Harassment & Disciplinary Practice: Turner Coachways recognises that cultural differences exist and different practices apply in various jurisdictions; however, the terms and conditions of employment should be based on an individual's ability to do the job, not on the basis of race, colour, religion, sex, age, physical ability, national origin, or any other protected characteristic. Workers should be treated with respect and dignity. In terms of disciplinary practices, they should be fair, arbitrary and effective. Employees of Turner Coachways and its clients must not be exposed to physical punishment, threats of violence or physical, sexual, psychological or verbal harassment or maltreatment.
- 6.1.7 Freedom of Association: Turner Coachways Ltd should respect the rights of their employees to choose to associate with or not associate with or to establish any lawful organisation including labour organisations.
- 6.1.8 Health & Safety: Turner Coachways Ltd must provide employees with safe and healthy working environment, and where provided, a safe and healthy living environment. They shall comply with all applicable worker safety laws and regulations which includes: Building Integrity, Occupational Safety, Occupational Injury & Illness, Emergency Preparedness, Machine Safeguarding, Chemical Safety, Sanitation, Food & Dormitory.
- 6.1.9 Environmental: Turner Coachways Ltd shall comply with all applicable environmental laws and regulations. This shall include having processes in place to ensure compliance with those regulations relating to the handling, recycling, and disposal of dangerous or hazardous materials. Turner Coachways favours suppliers and customers that share its commitment to sustainable business practices.
- 6.1.10 Security: Turner Coachways will maintain adequate security at all facilities and implement supply chain security procedures designed to prevent the introduction of non-manifested cargo into outbound shipments. Each Supplier facility must have written security procedures to document proof of adequate security controls.
- 6.1.11 Gift & Gratuity Policy: Turner Coachways Ltd employees are prohibited from soliciting or accepting any gifts, gratuities or other monetary incentives that are designed to improperly influence business decisions or as a condition of

doing business. Employees have an affirmative duty to report any such request or demand immediately to Turner Coachways. Certain business courtesies are not prohibited. Employees may accept gifts that are infrequent and nominal in value so long as the receipt of these gifts does not suggest a conflict of interest or give the appearance of an improper attempt to influence business decisions. We expect our employees to adhere to these gift giving guidelines.

7. CONSEQUENCES

- 7.1 Failure to comply with the above procedures may result in disciplinary action and legal action being taken wherever appropriate.
- 7.2 Directors must have an open-door policy and welcome suggestions and concerns from all employees. We believe this will allow employees to feel comfortable discussing any issues and will alert concerns within the work force.

Endorsed by



Kevyn Jones

Managing Director

21/10/2023