



Policy on Human Rights & Labour Conditions

Introduction

Tel-Lingua is committed to protecting the human rights of everyone who works for the company and all those who have dealings with it. As a responsible company, we support the United Nations Universal Declaration of Human Rights that sets “common standards of achievement for all people and all nations”

We recognise that our responsibility for human rights and labour conditions encompasses:

- Operating sites** In developed countries, performance on most of the issues covered in this policy will be required by law. Therefore this policy is primarily provided to guide operations in those emerging markets where concerns are regularly expressed about human rights.
- Supply chain** It is our aspiration that the working conditions throughout our supply chain meet internationally-accepted standards of human rights and working conditions

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Principles underlying this policy

This policy on human rights and labour conditions has been developed with reference to the following documents:

- The United Nations Universal Declaration of Human Rights.
- The 8 so-called 'fundamental' labour standards of the International Labour Organisation. These cover freedom of association; the right to organise and bargain collectively; use of forced labour and equality.
- The UN Convention on the Rights of the Child.

Responsibility

We believe that everyone in our organisation is responsible for having due regard for human rights. In particular:

- The Board has overall responsibility for ensuring that human rights considerations are integral in the way in which existing operations and new opportunities are developed and managed.
- Managers and supervisors provide visible leadership that promote human rights as an equal priority to other business issues. They also have a responsibility for identifying abuses that occur.
- All employees are responsible for ensuring that their own actions do not impair the human rights of others. They are also encouraged to bring forward, in confidence, any concerns that they may have about human rights abuses.

Policy principles

Tel-Lingua requires that all its operating units seek to abide by the following:

Child labour

We will not employ workers under the legal minimum age for admission to work stipulated by the laws of the countries where we work and will operate in accordance with ILO Conventions No 138 on the minimum age for admission to employment and No 182 on the banning of the worst forms of exploitation of child labour.

Forced labour

In accordance with ILO Conventions 29 on Forced Labour and 105 on the Abolition of Forced Labour, we will not make any use of forced labour, including prison or debt-bondage labour. We will not require the lodging of deposits or identity papers, either by our operating companies or agencies providing employees.

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Health and safety

We will provide a safe and healthy work environment and take all reasonable steps to prevent death or injury to anyone on our sites. Regular training to all our workers on health and safety issues will be provided. All workers will have access to bathroom facilities and potable water.

Freedom of association and the right to collective bargaining

We respect the principles of freedom of association and collective bargaining as defined in ILO Convention No 87 on the freedom of trade unions and the protection of trade union law and No 98 on the right of organisation and collective bargaining.

Discrimination

In accordance with ILO Convention 111 on Discrimination, we will not discriminate against any person based on race, caste, origin, religion, disability, gender, sexual orientation, union or political affiliation or age. We will not tolerate sexual or racial harassment or bullying. Rexam has specific policies on Discrimination/Harassment and Bullying/Victimisation, which are available from HR Departments or the Human Resource Policy section of the Rexam Intranet.

Discipline

We will not employ, or allow to be employed, any form of corporal punishment, physical coercion or verbal abuse. Any disciplinary matter will be dealt with through proper procedures.

Working hours

Working hours in our businesses, including rest days and holidays are informed by the relevant ILO Conventions regarding working hours (including No1 on working hours (factories); No 30 on working hours (factories and offices); No 47 on the 40-hour week; No132 on holidays with pay) and prevailing national laws.

Compensation

Wages paid for standard working hours must meet local legally-mandated minimum wage levels. However, they must also be sufficient to meet the basic needs of workers and their families. We will work with reputable local organisations to establish what a 'living wage' is.

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Living conditions

In sites where dormitory accommodation is provided to our workers we will ensure that this accommodation is of an acceptable standard of size and cleanliness; that it is appropriate to local customs and norms and that adequate facilities are provided. We will work with relevant NGOs and other partners to establish what accommodation standards are appropriate, and to ensure that this standard is achieved and maintained.

Implementation

Responsibility

Responsibility for the compliance of Tel-Lingua with this policy lies ultimately with the Board. Performance will be reported to the Board by the Group Director of Human Resources. Responsibility for the implementation of the policy lies with the Sector HR Directors who are required to develop procedures relevant to their Sector.

Monitoring and compliance

Each Sector will be responsible for ensuring that it has in place the necessary arrangements to monitor and report compliance against this policy on an annual basis. Each business unit will be required to report their performance against this policy in its Management Representation Letter.

Approved: Andrew Mangold

Date: 4th June 2011

