

# HUMAN RIGHTS POLICY

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## PURPOSE

Our purpose at Nylacast is to solve company engineering problems for a safer and greener world. We are proud to be the world leader in the design, manufacture, and supply of engineered solutions, with a global presence across 9 worldwide locations and employing over 550 people.

We recognise that we must continually adhere to the highest standards possible across everything that we do as a company.

Respecting all human rights throughout our company, customer base and supply chain is fundamental, and we are committed to treat all individuals equally, with respect and dignity.

## SCOPE

This policy is applicable to all persons including employees at all levels, directors, officers, shareholders, employees, agency workers, agents, contractors, and suppliers who undertake activities by or on behalf of Nylacast in any capacity no matter where they are located (within or outside the UK). The policy sets our commitment and steps we take to meet our legal and moral duty on international recognised human rights standards.

We believe that we have a responsibility to ensure that human rights are understood and observed in all the areas that we work, including those of suppliers and those based outside our main country of operation. We support the principles set out in the following international standards:

- UN Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- The International Labour Organization's Fundamental Convention

## REFERENCE DOCUMENTS

- Anti-Slavery and Human Trafficking Policy
- Anti-Bullying and Harassment Policy
- Equal Opportunities Policy
- Disciplinary Policy
- Grievance Policy
- Whistleblower Policy
- Health & Safety Policy
- The Employee Handbook

## RESPONSIBILITY

It is the responsibility of all individuals affiliated with our company, whether as employees or under our supervision, to take on the responsibility of preventing, identifying, and reporting violations of this policy. Employees are obligated to avoid any actions that could potentially lead to, or even imply, a violation of this policy. We strongly encourage employees to promptly voice any concerns or suspicions related to this policy, regardless of their location within our organization or supply chains.

This policy is intended to safeguard the well-being of our employees, customers, and suppliers; please review it carefully. Any breach of this policy may initiate an inquiry in accordance with The Disciplinary and Grievance Policy, and may result in disciplinary measures or, for individuals who are not employees, other forms of enforcement action.

## POLICY

Nylacast is committed to maintaining the highest standards of integrity, therefore Nylacast will conduct its business in an open, honest, and ethical manner.

Nylacast complies with national laws, regulations, legislation, and governance in all the countries that it operates in.

Employees are encouraged to raise concerns about any issue or suspicion that may breach this policy.

## WITHIN OUR WORKPLACE

Each employee has a responsibility to maintain a working atmosphere that upholds human rights, devoid of any discrimination or harassment. If any employee suspects that an individual, whether within Nylacast, one of our suppliers, or a contractor, is in violation of this Human Rights Policy or applicable laws, we kindly request that they promptly notify their supervisor and the HR Manager or make use of the Whistleblower process to report the matter.

As a business we will adhere to the following across our operations:

- We will compensate all individuals fairly and competitively whilst ensuring that we pay above the National Minimum Wage for the jurisdictions that we operate in, relating to wages, working hours and overtime and benefits.
- We are committed to developing employee skills and will provide career opportunities via our performance management reviews or through training, either externally or internally.
- Nylacast will grant the right to annual holiday & sick leave as well as parental leave for care of newborn child or newly adopted child as per the working time directive.
- In the event of termination of employment, Nylacast will meet applicable laws and industry standards.
- We will treat all individuals fairly and any form of physical, the threat of physical abuse, verbal abuse, violence, sexual or psychological harassment in the workplace by either fellow employees or management will not be tolerated.

## **HEALTH, SAFETY AND WELL BEING IN THE WORKPLACE**

We are committed to ensure the highest standards of Health, Safety and Well-being for all our employees and any other individual who may be affected by our business activities. Our Health and Safety Policy sets out our arrangements and the responsibilities around these.

## **DIVERSITY, INCLUSION AND EQUALITY**

Nylacast will provide equal opportunities in all aspects of employment to ensure that all individuals are treated without discrimination irrespective of sex, race, religion, national or ethnic origin, disability, marital status, or age.

Nylacast is committed to a workplace where every employee or prospective employee is treated fairly and without discrimination on the basis of race, colour, gender, language, religion, political beliefs, caste, national or social origin, property, birth, union affiliation, sexual orientation, age, disability, or any other distinctive attributes.

Our employment decisions, including recruitment, termination, and retirement, are made exclusively on the basis of lawful and non-discriminatory criteria.

## **LABOUR RIGHTS**

All employees are provided with a written, understandable, and legally binding employment contract. We provide fair working conditions for our employees including terms and conditions of employment, remuneration, working hours, resting time, holiday entitlements, maternity/paternity leave and benefits; we comply with all applicable legislation. We have specific policies which set out our commitment and the responsibilities of management and employees.

## **PAY RATES**

Nylacast are committed to ensuring that employees are not paid lower than that required by local laws.

## **CAREER MANAGEMENT AND TRAINING**

Annual performance reviews are carried out for all employees and career; training and development is discussed as part of that process.

## **ANTI-SLAVERY, FORCED LABOUR, HUMAN TRAFFICKING AND CHILD LABOUR**

We are committed to conduct all our operations in an honest, ethical manner which does not violate the fundamentals of human rights. Modern slavery is a crime, and we will take steps to ensure that modern slavery is not taking place anywhere within our business or within a supply chain. We are committed to ensuring there is transparency in our business and on our approach to tackling modern slavery throughout our supply chains. We are committed to comply with the all the obligations under the “Modern Slavery Act 2015”.

We do not tolerate the use of child labour and require that our suppliers do not to use children in their operations (including in their value chain).

## **COMPLIANCE**

Nylacast is committed to maintaining the highest standards of integrity, therefore Nylacast will conduct its business in an open, honest, and ethical manner. As such the Board of Directors take responsibility for ensuring that this policy is enforced throughout the company.

Nylacast complies with national laws, regulations, legislation, and governance in the countries that it operates in. Employees are encouraged to raise concerns about any issue or suspicion that may breach this policy.

## **TRAINING, AWARENESS AND COMMUNICATION**

Nylacast will take appropriate action to ensure that all aspects of this policy are communicated to their employees and will be part of the company's induction process, new starters will be told about this policy.

## **REVIEW AND REVISION**

This policy is not contractual but is intended as a statement of current company policy and commitment to all its workers. Nylacast therefore reserves the right, at any time, to amend the policy in its absolute discretion.

The Group HR Manager is responsible for reviewing and updating the policy.

## CHANGE HISTORY

Date	Rev. No.	Revision by	Description of change
12/11/21	01	Ian Mallabone	First issue of the Policy
22/12/22	02	Ian Mallabone	Terminology, Reporting & Monitoring sections added to the Policy