



## PEEK-A-BOO Group

### SOCIAL, ETHICAL and ENVIRONMENTAL CODE OF CONDUCT

#### **Introduction:**

Since the beginning, PEEK – A – BOO Group has always based its development on fundamental values (safety, partnership, transparency, creativity, innovation, human respect) that are perfectly matching the principles of Sustainable Development and Corporate Social Responsibility.

Fully aware of our responsibilities as leading international player on our market, we wish to carry further improvements in our existing policies and procedures, by performing our duty of due diligence, promoting transparency and ethical behavior in our entire supply-chain. This will be done with the full implication of our business partners in an approach of continuous improvement and durability of the business relationship.

**Objectives:** This Code of Conduct is a clear statement of what PEEK – A – BOO Group is expecting from its business partners in terms of working conditions that are respectful of human rights, social progress and environment. Suppliers are requested to abide by the provisions of this Code of Conduct which stipulates minimum requirements.

#### **References:**

This Code of Conduct is based on the fundamental principles defined in several original texts (see Annex): the Universal Declaration of Human Rights, the fundamental conventions and recommendations of the International Labor Organization (ILO), the guiding principles on business and human rights (UN), the Organization of Economic Cooperation and Development (OECD) guidelines for multinational enterprises, the principles of the United Nation's Global Compact.

PEEK-A-BOO Group also aims at respecting the provisions of the following International standards and regulations:

- ISO 14001 on environmental management
- OHSAS 18001 on occupational health and safety
- SA 8000 on working conditions
- REACH on the management of chemicals contained in substances and products

## **Commitments to fundamental principles:**

### 1. No child labor - Safe management of young workers

PEEK-A-BOO Group forbids the direct or indirect employment of children under the age of 15 or below the country's compulsory education age if it is over 15, except in cases expressly authorized by the ILO (International Labor Organization).

Age of applicants should be checked upon recruitment and a specific procedure written to enforce this policy.

If the company already employs children, a support program must be set up to organize their departure from the workplace under the best possible circumstances.,

Young workers (between the minimum legal age and 18 years) may not be employed in a job that endangers their health, safety, morality, or physical and intellectual development. Their working hours must be compatible with school attendance or participation in apprenticeship programs.

### 2. Employment is freely chosen – No forced labor

Every employee must be free to choose to work without being threatened with penalties, fines or any other sanction by his/her employer. Employees must be free to leave their workstation at the end of each shift, and to terminate their employment subject to due notice.

Forced prison labor is prohibited.

The employer guarantees the employee's right to leave the workplace in the case of imminent danger to his/her physical integrity or life.

### 3. Working conditions complying with occupational health and safety Regulations

PEEK-A-BOO business partners must ensure a safe and healthy environment for their employees, with particular attention to the most vulnerable, such as young workers, pregnant women and disabled workers. Compliance with national occupational health and safety regulations, or international standards if no such regulations exist, is a strict minimum and must be applied to the whole premises, including dormitories if any.

A Health and Safety Manager must be appointed from the management team and a Health and Safety committee, consisting of members from the management and employees, shall meet regularly to deal with these matters.

This H & S Committee should regularly assess the occupational health and safety risks for each job position in the company, in order to avoid accidents, injuries and illnesses.

Employees' awareness must be developed through regular trainings and exercises concerning the use of personal protective equipment (PPE) and evacuation and fire-fighting procedures.

The safety of buildings, machines, fire-fighting and electrical equipment must be regularly inspected.

The employer should guarantee medical assistance and access to emergency care, as well as access to drinking water and safe, clean areas for eating and break times.

Any areas used by employees must comply with local or, if none, internationally agreed requirements regarding space, ventilation, temperature, light and noise.

#### 4. Freedom of association and the right to collective bargaining are respected

PEEK-A-BOO Group respects and promotes the internationally recognized right to freedom of association and to collective bargaining, in its own company and throughout its supply chain. All workers should have the right to join the trade union of their choice, to create their own union and to participate in collective bargaining freely and independently without suffering any discrimination or intimidation.

If national legislation restricts these fundamental liberties, the employer must promote social dialogue and workers' representation in other ways, for example by creating workers' committees or associations, freely elected by its employees.

#### 5. No discrimination

Discrimination on the basis of race, religion, ethnicity, caste, origin, age, gender, handicap, sexual orientation, membership in a trade union or political organization is prohibited when recruiting or deciding remuneration, access to training, promotion and dismissal. Any harassment, psychological or physical violence in relation to any of the above is strictly prohibited.

Same conditions should be applied indifferently to both migrant and local workers.

#### 6. No inhumane or harsh treatment, nor any kind of modern slavery

No employee should be subjected to degrading or humiliating treatment, suffer physical punishment, threats or any other form of psychological or sexual harassment.

#### 7. Reasonable working hours

Working hours must comply with national and international regulations and not exceed 48 hours per week (excluding overtime), except for specific ILO exceptions.

Overtime should remain occasional, accepted voluntarily by the employee and may not exceed 12 hours per week.

All workers must be permitted breaks during the working day and one day off after any period of 6 consecutive working days, unless otherwise specified in a collective bargaining agreement or a special authorization from the competent authority.

#### 8. Fair remuneration and social benefits

All employees, including piece rate workers, should be paid at least the minimum legal wage (national or local) for the legal duration of work, and for the job category. If industry standards approved by collective conventions are more favorable to the employee, then employer should apply them.

In case local minimum wage does not allow workers to have a decent lifestyle, ensuring the health and well being of themselves and their families, PEEK-A-BOO Group invites its business partners to consult the employees' representatives in order to consider all possible solutions that aim at improving salary level.

Every employee should also receive all legal social benefits foreseen by local law.

Wages must be paid regularly and on time. Employees shall be provided with detailed and comprehensible pay slips. No deductions are allowed unless provided for by law or by a collective bargaining agreement.

The calculation and payment of overtime at premium rates must comply with legal provisions.

#### 9. No precarious employment – No disguised subcontracting

Employment should be provided according to a formal working relationship, based on national laws and practices and described in either a letter of employment or an employment contract which detail the worker's rights, obligations and employment conditions: status, hours, wage, terms and conditions of payment, etc.

Disguised subcontracting is prohibited by this Code of Conduct.

Any partial or complete transfer of the manufacture of goods subject of an agreement between supplier and client must first be authorized by PEEK-A-BOO Group.

#### 10. Protection of the environment

PEEK-A-BOO Group is strongly invested in minimizing the impacts of the activity of its supply-chain on the environment.

Suppliers must comply with applicable national laws and regulations for the protection of the environment as a strict minimum.

An impact study and risk assessment must be carried out, with the aim of identifying the impacts on the conservation of local culture, landscapes and biodiversity. An appropriate management system must be implemented to match these impacts and related risks.

Any necessary authorizations and permits must be obtained for the use of water, gas and electricity supplies, waste processing, the management of hazardous substances and the emission of aqueous and atmospheric waste.

Sustainable means of transportation should be used whenever available.

#### 11. Business ethics: no corruption or counterfeiting

All PEEK-A-BOO Group's suppliers and other members of its supply-chain must undertake to ensure strict compliance with the laws applicable in their countries of operation, and the legal requirements and standards applicable to their industry. They undertake to conduct their business according to ethical principles, rejecting any participation in acts of corruption, extortion, bribery or other fraudulent practices.

The counterfeiting of patents, models, drawings, brands and any infringement of other intellectual property rights are strictly prohibited.

#### 12. Promotion of management systems

To comply with this Code of Conduct, business partners must implement and deploy appropriate management systems, formalized by written procedures and trainings.

A member of the management team should be given responsibility for social, ethical and environmental issues.

Business partners shall encourage their own suppliers to abide by these same social, ethical and environmental commitments.

## **Annex:References**

- Universal Declaration of Human Rights, (UN, 1948)
- The International Labour Organization's (ILO) fundamental Conventions
  - C087 Freedom of Association and Protection of the Right to Organise Convention, 1948
  - C098 Right to Organise and Collective Bargaining Convention, 1949
  - C029 Forced Labour Convention, 1930
  - C105 Abolition of Forced Labour Convention, 1957
  - C138 Minimum Age Convention, 1973
  - C182 Worst Forms of Child Labour Convention, 1999
  - C100 Equal Remuneration Convention, 1951
  - C111 Discrimination (Employment and Occupation) Convention, 1958
- Other ILO conventions:
  - C155 Occupational Safety and Health, 1981
  - C097 Migration for Employment Convention, 1949
  - C095 Protection of Wages Convention, 1949
- Guiding Principles for Business and Human Rights, (UN, 2011)
- Global Compact (UN, 2000)
- OECD Guidelines for multinational enterprises (OECD, 2011)