



ETHICAL TRADING AND HUMAN RIGHTS POLICY

SIG plc operates under a number of fundamental principles which it believes are important to uphold and which are contained in its Code of Conduct.

This policy outlines our intentions and ethical standards in the sourcing of materials from suppliers and potential suppliers and expresses the standards concerning safe and fair working conditions for employees, the responsible management of social and environmental issues within the Company and the international supply chain. The SIG plc Board of Directors is committed to adhering to and upholding these standards across the Group.

As a company we support organisations in upholding human rights principles, wherever we operate. Although there is no definitive consensus on the boundaries of corporate responsibility in respect of human rights, we need to ensure that we are not involved in human rights violations, either directly or indirectly and that we operate in accordance with the Universal Declaration of Human Rights (UDHR) and take account of other internationally accepted human rights standards, e.g.: the International Labour Organisation (ILO) Fundamental Conventions.

In addition to this we promote human rights through our employment policies and practices, through our supply chain and through the responsible use of our products and services. The promotion of human rights through our business activities forms part of our broader objective to be a leader in corporate responsibility.

Ethical Trading Principles – Human Impact

In support of choosing businesses with which we wish to develop long term partnerships, we have established key principles which we expect any partnering businesses to adhere to. These have been based on the Ethical Trading Initiative Base Code.

Our key principles are as follows:

1. Employment is freely chosen
2. Freedom of association is respected
3. Working conditions are safe and hygienic, including safe housing where appropriate
4. Child labour shall not be used
5. Living wages are paid in line with local law
6. Working hours are not excessive
7. Discrimination is not practised
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed

Ethical Trading Principles – Environmental Impact

Suppliers should, as a minimum, comply with all statutory and local legal requirements relating to the environmental impacts of their business in their country. In addition, steps should be taken to optimise the use of energy and natural resources and reduce the generation of waste.

Ethical Trading Principles – Economic Impact

SIG will not exert undue pressure on its suppliers in terms of price, discount, payment terms or other financial arrangements so as to jeopardise the long term viability of their operations.

Method of Assessment

SIG aims to use a variety of assessment methods to verify ethical sourcing standards. SIG will work collaboratively with our suppliers on the implementation of the Policy, which may include:

1. Vendor assessment questionnaires or joint audits
2. Site visits
3. Individual and group employee interviews

The Company may use external sources such as SEDEX (Supplier Ethical Data Exchange) to allow for wider research and to cross check details with third party assessments.

Principle - Operating

We encourage a spirit of mutual trust between SIG and our suppliers and will work with them to achieve required ethical standards and, as far as possible, at no increase in cost or decrease in quality.

1. An SIG senior representative will be assigned responsibility for compliance with this policy and effective communication of the policy to employees. Suppliers are expected to do the same.
2. Suppliers and subcontractors will be treated fairly, honestly and in accordance with agreed terms.
3. From time to time, suppliers may divulge confidential information to SIG and its employees. It is our duty to respect these confidences.
4. Any complaints from suppliers will be dealt with promptly and fairly.
5. It is not Company policy to knowingly infringe on the copyright, trademarks, patents or other properly registered intellectual property of others.
6. Employees will ensure that contracts or arrangements agreed with suppliers are consistent with the values and principles outlined and that they do not reflect badly on the reputation of the Group.
7. Any site visits conducted or interviews completed will be reported and the results communicated to suppliers to allow for transparency and feedback. We recognise this as a continuous improvement process, with the aim of working with suppliers to improve standards rather than find alternative sources of supply.

Respect for Local Tradition and Hidden Workers

Whilst our aim is to respect the local cultures of the countries within which SIG operates, SIG will expect access to information on supplier practices and will place particular emphasis on the use of 'hidden workers,' such as home workers, children and contracted labour, when considering suppliers from countries outside of normal operations.

Action

We expect suppliers to agree with the ethical stance outlined in this policy and to commit to a programme of continuous improvement.

Implementation and approval

The Group Chief Executive has lead responsibility for policy implementation within the Group and this policy is signed by the CEO to demonstrate the Board's commitment. This policy has been adopted by the Board of Directors of each subsidiary and a copy of this policy is also posted on the SIG plc website www.sigplc.com.

Meinie Oldersma
Chief Executive Officer

Director for and on behalf of SIG plc and SIG Trading Limited
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