



Ethical Training Initiative (ETI) Code Policy and Procedure

1. Purpose

This policy outlines Roman Ltd's commitment to ethical trading practices in line with the Ethical Trading Initiative (ETI) Base Code. It provides guidelines for implementing and maintaining ethical standards across all operations and within our supply chain.

2. Scope

This policy applies to all employees, contractors, suppliers, and partners of Roman Ltd globally.

3. ETI Base Code Principles

Roman Ltd adheres to the ETI Base Code, which consists of the following principles:

1. **Employment is freely chosen.**
2. **Freedom of association and the right to collective bargaining are respected.**
3. **Working conditions are safe and hygienic.**
4. **Child labour shall not be used.**
5. **Living wages are paid.**
6. **Working hours are not excessive.**
7. **No discrimination is practiced.**
8. **Regular employment is provided.**
9. **No harsh or inhumane treatment is allowed.**

4. Policy Statement

Roman Ltd is dedicated to conducting business ethically and responsibly. We are committed to upholding the ETI Base Code principles and ensuring fair labour practices throughout our operations and supply chain.

5. Responsibilities

- **Senior Management:** Overseeing the implementation and compliance with the ETI Code policy.
- **Human Resources (HR):** Ensuring policies and procedures align with ETI principles, conducting training, and addressing concerns related to labour practices.
- **Procurement and Supply Chain Management:** Conducting due diligence on suppliers and ensuring they adhere to ETI standards.
- **Employees and Contractors:** Complying with the ETI Code policy and reporting any violations.

6. Implementation Procedure

6.1 Communication and Training

1. **Communication:** The ETI Code policy will be communicated to all employees, suppliers, and contractors. This includes:
 - Posting the policy on the company intranet and website.
 - Distributing copies to new employees and suppliers.
2. **Training:** Regular training sessions will be conducted to ensure understanding and compliance with the ETI principles.

6.2 Supplier Engagement and Due Diligence

1. **Supplier Code of Conduct:** All suppliers must sign and comply with our Supplier Code of Conduct, which reflects the ETI Base Code principles.
2. **Risk Assessment:** Conduct regular risk assessments of suppliers to identify potential risks related to labour practices.
3. **Audits:** Perform periodic audits of suppliers to ensure compliance with the ETI standards. Audits will include:
 - On-site inspections.
 - Worker interviews.
 - Review of relevant documents.

6.3 Reporting and Addressing Violations

1. **Reporting Mechanism:** Employees and suppliers can report concerns or violations of the ETI Code policy through:
 - **Internal Suggestion Box:** Suggestion boxes are located across multiple departments on site. Confidential reports can be submitted by completing the whistleblowing report form and posting the form to the secured box. HR/ Senior management will be granted access for the purpose of review and feedback for documentation received.
 - **External link:** An anonymous reporting link can be accessed from the company home page: <https://roman-showers.com> .
2. **Investigation:** HR will investigate reported violations promptly and confidentially. The investigation process includes:
 - Gathering information and evidence.
 - Conducting interviews with relevant parties.
 - Reviewing documentation and records.
3. **Corrective Actions:** If a violation is confirmed, appropriate corrective actions will be taken, which may include:
 - Requiring suppliers to implement remediation plans.
 - Conducting follow-up audits to ensure compliance.
 - Terminating contracts with non-compliant suppliers if necessary.

7. Monitoring and Review

1. **Monitoring:** Regular monitoring of our operations and supply chain will be conducted to ensure ongoing compliance with the ETI Code policy.
2. **Review:** This policy will be reviewed annually by senior management and HR to ensure its effectiveness and alignment with the latest ethical trading standards. Updates and changes will be communicated to all employees and suppliers.

8. Non-Retaliation

Roman Ltd strictly prohibits retaliation against anyone who reports a concern or participates in an investigation regarding a violation of this policy. Any form of retaliation will result in disciplinary action, up to and including termination of employment or contracts.