

WILLIAM TURNER

**Human
Rights Policy
Statement**

June 2025

Our Commitment

At William Turner Ltd, we are committed to respecting and upholding the human rights and freedoms of all individuals affected by our operations, including employees, workers across our supply chain, customers, and members of the communities we engage with.

We recognise our responsibility to act ethically and transparently in line with international human rights standards. This policy applies to all areas of our business and extends to our suppliers, contractors, and business partners.

1. Guiding Frameworks

This Human Rights Policy is informed by the following international and UK frameworks:

- Universal Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- International Labour Organization (ILO) Core Conventions
- The Human Rights Act 1998
- The Modern Slavery Act 2015
- The Ethical Trading Initiative (ETI) Base Code
- The UN Convention on the Rights of the Child

2. Scope of Responsibility

Our Workplaces

We are committed to ensuring a safe, inclusive, and respectful working environment across all our locations—including offices, manufacturing sites, and distribution centres. Every employee, contractor, and visitor will be treated with dignity and fairness.

Our Supply Chain

We expect our suppliers and business partners to uphold the same standards. We aim to work only with suppliers who:

- Respect internationally recognised human rights
- Comply with national laws and labour regulations
- Can demonstrate clear commitments to fair, safe, and ethical labour practices

3. Core Human Rights Principles

Child Labour

We strictly prohibit the use of child labour in any part of our business or supply chain. All workers must meet the minimum legal working age as per the Employment Act 2008 and applicable ILO conventions.

Forced or Compulsory Labour

We do not tolerate any form of forced, bonded, or involuntary labour. This includes slavery, servitude, debt bondage, and human trafficking. We are committed to identifying and eliminating any risks in accordance with the Modern Slavery Act 2015.

Non-Discrimination

We do not tolerate discrimination on the basis of race, gender, gender identity, age, religion or belief, disability, sexual orientation, marital or parental status, or any other protected characteristic. This aligns with Article 14 of the Human Rights Act 1998.

Freedom of Association

We respect the right of all employees to join or form trade unions and to bargain collectively, in line with ILO standards and local laws.

Safe and Dignified Working Conditions

We are committed to maintaining safe, hygienic, and healthy working environments. No employee shall be subjected to harassment, abuse, or any form of degrading treatment.

Disciplinary Practices

We prohibit the use of corporal punishment, physical or verbal abuse, or coercion. All disciplinary processes must be fair, transparent, and compliant with our internal procedures and employment laws.

Working Hours

We adhere to the Working Time Regulations 1998 and relevant labour laws. Any opt-out clauses will be clearly communicated and voluntary. Overtime must be reasonable and compensated fairly.

Wages and Benefits

We ensure that all employees receive at least the national minimum wage or living wage, depending on jurisdiction. All legal entitlements, including paid leave and statutory benefits, will be fully upheld.

4. Implementation and Accountability

- This policy is approved and overseen by the Managing Director and senior leadership.
- All employees are expected to understand and adhere to this policy.
- Suppliers and partners are contractually required to comply with our human rights standards.
- We conduct regular reviews and risk assessments to identify, prevent, and address potential human rights violations.
- Any violations will be investigated and may result in corrective action, suspension, or termination of contracts.

5. Reporting Concerns

We are committed to a culture of openness and accountability. Any individual—whether employee, supplier, or external stakeholder—may raise concerns regarding human rights violations without fear of retaliation.

Reports can be made directly to management or via the Banner People and Culture Team.

Signed:

Position: Managing Director

Print Name: Bruce Freeland

Date of Issue:

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