



LTE Group Slavery and Human Trafficking Statement Supplier Code of Conduct EU August 2019

Slavery and Human Trafficking Statement

Introduction

LTE Group is dedicated to procuring goods, works and services for its operating divisions without causing harm to others. In so doing, LTE Group is committed to supporting the UK Government's approach to implementing the UN Guiding Principles on Business and Human Rights.

This statement is designed to satisfy the requirements of Part 6 of the Modern Slavery Act 2015, by informing our suppliers, clients, students, staff, strategic partners and the public about LTE Group and its policy with respect to modern slavery, human trafficking, forced and bonded labour and labour rights violations in its Supply Chains.

LTE Group considers that its spend through its supply agreements warrants a statement on the risks inherent in our Supply Chains and the steps we are taking to address them, in line with LTE Group's pioneering practices in sustainable and responsible procurement.

LTE Group procures a large amount of goods, works and services from National Frameworks, who will as part of European Tendering Legislation, have undertaken enquiries and evaluations into the wide range of products that are supplied, many of which are sourced from overseas manufacturers who operate in low-cost countries where modern forms of slavery are prevalent.

For those suppliers that fall into higher-risk areas, these will be asked to commit to the [Base Code of the Ethical Trading Initiative](#) (ETI) and LTE Group will be working to encourage all suppliers in these areas to support these initiatives. The ETI Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice, requiring that:

Employment is freely chosen;
Freedom of association and the right to collective bargaining are respected;
Working conditions are safe and hygienic;
Child labour shall not be used;
Living wages are paid;
Working hours are not excessive;
No discrimination is practised;
Regular employment is provided; and
No harsh or inhumane treatment is allowed.

Our Plans for the Future

LTE Group expresses its commitment to better understand its Supply Chains and work towards greater transparency and responsibility towards people working within them.

For contracts that LTE Group have awarded, we will identify those Supply Chains which represent a medium- to high-risk of modern slavery, human trafficking, forced and bonded labour, and labour rights violations. Working with our suppliers, clients, students, staff, strategic partners and the public, we will closely monitor those Supply Chains that have been identified as a potential risk and take appropriate action if necessary. [Human Trafficking, Smuggling and Slavery Guidance](#).

Supplier Code of conduct

LTE Group endeavour to engage with suppliers, sub-contractors and strategic partners who treat their workers with dignity and respect, adhere to applicable laws and regulations, and provide their goods, works or services in an environmentally sustainable manner. It is the organisations policy to request our Supply Chain to respect the principles of our Supplier Code of Conduct and adopt practices which comply with it. LTE Group expect our suppliers, sub-contractors and strategic partners undertake to commit to the following requirements:

Employment Practices

- To comply with all employment laws applicable to its business.
- Must not use child labour which prevents children from complying with compulsory schooling or training, being harmful to their health or development.
- Must make no use of forced or compulsory labour.
- Must comply with national law and regulations regarding working hours, wages, benefits and written employment conditions.
- Must not discriminate unlawfully in its employment decisions based on: age, disability, race (including colour, nationality, ethnic group), religion or belief, sex, sexual orientation, trans gender, pregnancy or maternity, marriage or civil partnership, trade union membership or political affiliation.
- Shall not treat its workers in an inhumane or harsh way including harassment, bullying, physical or verbal abuse or other forms of intimidation.
- Must notify its employees of the applicable supplier code of conduct.

Environmental

- All waste materials and production by-products should be disposed of properly and in an environmentally responsible manner.
- All local laws and regulations must be met and operations conducted in a manner that conserves resources.
- LTE Group expect our Supply Chain to share our commitment to a clean and safe environment.
- LTE Group encourage initiatives to reduce the impact on the environment, particularly through the use of environmentally-friendly technologies.
- LTE Group's Supply Chain shall agree to respect local and international environmental regulations and standards.
- LTE Group's Supply Chain shall be able to prove the effective implementation of the following requirements: The existence of an environmental management system, possibly ISO 14001 or EMAS certified.

Health and Safety

- Employers must provide a safe and healthy work environment.
- Fire prevention equipment must be accessible (in factory and dormitory facilities), and employers are responsible for conducting fire prevention and evacuation training.
- Dormitory housing should provide clean and adequate space for employees with sanitary facilities and water supply.
- Restrooms should be clean and available for all employees.
- The supplier must have a plan for emergencies.

Ethics and Integrity

- LTE Group's Supply Chain must not offer or give, any gift or consideration of any kind as an inducement or reward for doing or refraining from doing or for having done or refrained from doing, any act in relation to the obtaining of any contract with LTE Group, or for showing or refraining from showing favour or disfavour to any person in relation to the Contract or any such other.
- LTE Group's Supply Chain must comply with all anti-bribery and anti-corruption laws applicable to our business, including the Bribery Act 2010 and the Prevention of Corruption Act 1889 to 1916.

LTE Group reserves the right to request details of how its Supply Chain complies with this Supplier Code of Conduct and expects the application of principles of the Code with their Supply Chains.

This statement has been approved and published by LTE Group and will be reviewed at least once annually within six months of the group's financial year-end on 31st July.

Stewart Maloney MCIPS, CPSM
Procurement Manager
LTE Group

Last updated on 30th August 2019