

prelims Code of Conduct

prelims is a collaboration of leading publishers who have been working together since 2003 to drive social and environmental responsibility in our product supply chain.

As a group we have, until now, adopted the ICTI CARE process to monitor our suppliers in China, Malaysia and Singapore, but, we now feel in a position to articulate a common set of social and environmental standards for our industry, and have therefore developed our own industry Code of Conduct.

We now expect all our product suppliers to commit to working towards the Standards set out in this Code of Conduct or to equivalent standards.

Code Implementation

1.0 Member's Responsibility

- 1.1 We expect all prelims members to assign management responsibility for implementation of our Code of Conduct
- 1.2 We expect all members to communicate our Code of Conduct internally and externally as well as provide relevant training to staff where necessary
- 1.3 We expect members to work together to ensure that shared suppliers will only have to undergo one audit against either our Code of Conduct or the equivalent standards listed above
- 1.4 We expect members to take a risk based approach to managing suppliers. This means we will only ask suppliers deemed to be a medium or high risk to undergo a full social audit

2.0 Direct Supplier's Responsibility

- 2.1 We define direct suppliers as being those that manage or own the sites where our products are being manufactured
- 2.2 We expect direct suppliers who are rated as a medium or high risk to undergo an audit against our Code of Conduct or the equivalent standards as listed above
- 2.3 If a site has undergone an audit within the last year against one of the Codes listed above, they will not be required to undergo another audit as long as we are fully satisfied with the process

- 2.4 We expect direct suppliers to go through a risk assessment process, and audit as necessary, annually from the moment all issues associated with the initial audit are closed out. If any significant changes are made at site level during this time, we may ask the site to undergo a further risk assessment
- 2.5 We expect direct suppliers to ensure all staff on-site are aware of our Code of Conduct and publically display a copy of it in the principle languages of the workforce
- 2.6 We expect direct suppliers to monitor standards within their own supply chain to the same standard as we expect of them

3.0 Agent's Responsibility

- 3.1 We define agents as being all suppliers who act as a broker between our members and our direct product manufacturers
- 3.2 We expect agents to apply a risk assessment process to their suppliers and to share the results of this with us. If they do not have one, they can use the tools we have developed
- 3.3 We expect agents to conduct an audit of suppliers who are deemed a medium to high risk and for this audit to be of the same standard as our Code or equivalent codes as listed above. We expect agents to share the results of these with us

4.0 Open and Transparent relationships

- 4.1 We are committed to working closely with all our suppliers to support them in meeting the Standards set out in our Code of Conduct, or the equivalent Codes listed above, and therefore strongly encourage an honest and open engagement on all the issues set out in the Code

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Child Labour

- Our suppliers will only employ those who (whichever is higher):
 - Meet the min. legal age for employment or leaving age for compulsory education (whichever is higher out of these two)
- OR
- Are 15 years of age or higher
- The only exception to this will be in developing countries listed under ILO Convention 138 where the minimum age may be 14 years
- We expect our suppliers to support the transition of child labourers from work to school
- Our suppliers will only allow hazardous or overnight work to be carried out by those over the age of eighteen. We define 'hazardous' work as being any task that will negatively impact on the health and safety of a young person or that will harm physical, mental or social development

(ILO Conventions 138, 182)

Health and Safety

- Our suppliers will maintain a clean, safe and healthy work place that complies with all local legislation and includes access to toilet and drinking water facilities. Our suppliers will extend the same standards to both on and offsite accommodation provided for their workforce
- Our suppliers will put reasonable measures in place to prevent accidents, injuries, and causes of hazards in a working environment
- Our suppliers will appoint a senior manager to oversee the implementation of health and safety requirements at each facility and will provide relevant health and safety training to all employees

(ILO Convention 155)

Discipline

- Our suppliers will not tolerate an intimidating workplace or threaten to, or engage in, any form of physical, psychological, sexual, or verbal abuse against employees

(UNDHR Articles 3 & 5)

Forced Labour

- Our suppliers will not use forced, bonded, indentured, compulsory or involuntary prison labour
- Our suppliers will not require employees to lodge financial deposits or identity documents in order to secure or retain employment

(ILO Conventions 29, 105)

Discrimination

- Our suppliers will, without exception, treat employees, in all circumstances, on the ability to perform their jobs, and not on the basis of any personal characteristics or beliefs of any kind

(ILO Conventions 100, 111)

Wages

- Our suppliers will pay wages in line with local minimum wage laws or local industry benchmarks, whichever is higher
- Our suppliers will also strive to pay wages that meet 'basic' needs, where legal or industry standards do not do so
- Our suppliers will meet local legal requirements for overtime or local industry benchmarks, whichever is higher. Where local law does not stipulate a rate for overtime, our suppliers will pay a premium rate or local industry benchmarks, whichever are higher
- Our suppliers will provide all employees with written terms of payment as well as pay slips covering each pay period
- Our suppliers will provide all employees with mandated benefits as required by local law

(ILO Convention 95)

Hours

- Our suppliers will comply with local laws on working hours, or local industry benchmarks, or ensure a standard 48 hour working week, whichever affords workers greater protection
- Our suppliers will comply with local laws on overtime, or not allow more than 12 hours of overtime a week on a regular basis, whichever affords workers greater protection
- Our suppliers will provide at least one day off after every 6 consecutive days of work unless local laws stipulate otherwise, in which case suppliers must meet the higher requirement

(ILO Convention 1, 14 and UNDHR, Art 24)

Freedom of Association/Collective Bargaining

- Our suppliers will not interfere in the right to form or join a trade union and will create an open environment for trade union activities and will not discriminate against trade union members
- Where local law does not allow for free association or collective bargaining, our suppliers will not hinder parallel means of association and bargaining

(ILO Conventions 87, 98)

Environment

- Our suppliers will adhere to all local laws and regulations on environmental protection.