

SUBJECT: Code of Practice for Ethical Employment in Supply Chains

Statement

Starry Care specialises in recruitment, training and supply of temporary and permanent care staff.

Starry Care UK Limited is fully aware of the responsibility we bear towards our customers, employees and communities in which we work. Thus, in June 2017, we adopted the Welsh Government's Code of Practice for Ethical Employment in Supply Chains and are committed to ensuring that slavery and human trafficking are not taking place in any part of our organisation and its supply chains.

We are committed to ensuring that the working conditions of our supply chain are safe, that workers are treated with respect and dignity. We require from our suppliers and companies who do business with us and their own supply chain to operate in full compliance with the laws, rules, and regulations of the countries in which they operate.

To make this a reality, management appointed our HR Director as our Ethical Employment Champion and have developed an action plan to meet the twelve commitments in the Code in accordance with the Welsh Government's Code of Practice on Ethical Employment in Supply Chain published in March 2017.

In compliance with the Code to guide our business dealings, Starry Care UK Limited:

1. Shall comply with all laws applicable to our business activities. Examples include but not limited to the UN Universal Declaration of Human Rights as well as the 1998 International Labour organisation Declaration on Fundamental Principles and Rights at Work, in accordance with national law and practice.
2. Shall not discriminate against any worker based on race, colour, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, national origin, or marital status.
3. Is committed to eliminating discrimination, promoting equality of opportunity and fostering good relations between persons with protected characteristics and those who don't within their own and their own supply chains working and employment practices
4. Will ensure in conjunction with our suppliers, prohibit all forms of harassment and unlawful discrimination in the workplace
5. Will ensure in conjunction with her suppliers, prevent, reject underage labour of any kind. If national laws or regulations allow children between the ages of 13 and 15 to perform light work, such work is not permitted under any circumstances if it would hinder a minor from the completion of compulsory schooling or training, or if the employment would be harmful to their health development (International Labour Organisation Minimum Age Convention 138)
6. And its suppliers shall comply with the respective national laws and regulations regarding working hours, wages and benefits. Starry Care UK Limited and its suppliers shall pay all workers at least the minimum wage required by applicable laws and regulations and provide all legally mandated benefits. In addition to their compensation for regular hours of work, workers shall be compensated for overtime hours at the premium rate required by applicable laws and regulations

7. Alongside our suppliers comply with applicable occupational health and safety regulations and provide a work environment that is safe and conducive to good health, in order to preserve the health of employees and prevent accidents, injuries and work-related illnesses
8. Alongside our suppliers shall take all reasonable measures to make climate protection a priority as it relates to operations
9. Will ensure that any third-party business arrangement we shall enter into must comply with international anti-bribery standards as stated in the United Nations' Global compact and local anti-corruption and bribery laws including The Bribery act 2010
10. Will ensure compliance with our whistleblowing policy which allows complaints to be raised outside the usual management structure. Suppliers will also be expected to ensure the protection of confidentiality of workers who whistleblow and prohibit retaliation against workers who participate in such programs in good faith.
11. Shall not, alongside our suppliers promote the systematic compilation of information on trade unionists and its use to discriminate against those individuals because of their trade union membership or because of their involvement in trade union activity.
12. Shall ensure Compliance with the Supplier Code of Conduct by visiting (and/or appoint external partners to visit) the facilities of our subcontractors and or agents), with or without notice, to assess compliance with this Code. In particular but not exhaustively the purpose of the visit may be to audit the subcontractor's management information to verify wage, hour, payroll, and other worker records and practices. Violations of this Code may result in immediate termination as the Authority's Supplier and in legal action, where appropriate.

This policy is subject to annual review.

Signed:

BENJAMIN ALEGBA

HR Director, Starry Care UK Ltd.

DATE: 8/06/2021