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# Lovelight Supplier Code of Conduct

September 2020

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## Introduction

Our business is about two things: sourcing from around the world the latest in window furnishing design and technology, and listening to the needs of our clients.

We pride ourselves on delivering a truly superior product to the broader Australian market at very competitive prices. However, whilst doing this we recognise our responsibility to respect the human rights of the workers in our supply chain and to ensure the sustainability of the products we supply to our customers.

Lovelight is committed to ensuring socially and environmentally responsible sourcing practices across our entire supply chain. A key means of implementing this commitment is through our Supplier Code of Conduct, which includes minimum standards of conduct that all Suppliers must meet as a condition of doing business with Lovelight.

The Lovelight Supplier Code has been designed to ensure our Suppliers respect: internationally recognised labour standards and human rights obligations; business ethics; and principles of environmental sustainability.

## Compliance with our Supplier Code

Our Supplier Code applies to all Lovelight Suppliers ("Suppliers"). This includes Suppliers of the products we sell to our clients and customers, the goods we use in our own operations and our service providers.

Suppliers must review our Supplier Code and be familiar with its requirements. Suppliers must ensure their own suppliers and authorised sub-contractors also comply with the standards of conduct outlined in this Code.

The Code forms part of the contract with our Suppliers and in the event of a non-compliance with the Code, we expect the Supplier to develop an action plan to address and remediate it. We also reserve the right to discontinue business with the Supplier.

The Code does not replace the local laws of the countries in which our Suppliers operate. In the event of a conflict between the Code and a local law, the more stringent requirement should be followed.

## Reporting Violations

Any person, including workers of a Supplier, may report actual or suspected violations of the Code to Lovelight via [compliance@lovelight.com.au](mailto:compliance@lovelight.com.au). All reports will be followed up. The identity of anyone who makes a report will be kept strictly confidential, unless requested otherwise.



# Supplier Standards

## 1. Legal Compliance

Suppliers must:

- Comply with the legal requirements of the countries in which they operate, manufacture or source goods and services.

## 2. Child Labour

Suppliers must:

- Not engage in, or support the use of, child labour. This applies to workers directly employed by the Supplier or any third party providing components, raw materials, labour or services to the Supplier.
- Comply with the minimum employment age limit defined by national law or by International Labor Organization (ILO) Convention 138.
- Ensure young workers (under the age of 18) do not undertake work which is hazardous or unsafe to their physical and mental health.
- Be able to verify the age of all workers to ensure compliance.

## 3. Forced Labour

Suppliers must:

- Not engage in, or support the use of, any type of forced labour, bonded labour, indentured labour, prison labour or human trafficking. This applies to workers directly employed by the Supplier or any third party providing components, raw materials, labour or services to the Supplier.
- Respect the freedom of movement of their workers and not restrict their movement by controlling identity papers, holding money deposits, or taking any other action to prevent workers from terminating their employment.

## 4. Freedom of Association and Collective Bargaining

Suppliers must:

- To the extent permitted by local laws, respect the right of their workers to freedom of association and collective bargaining. This includes the right to form and join trade unions or other worker associations of their own choosing without harassment, interference or retaliation.
- When operating in countries where trade union activity is unlawful or where free and democratic trade union activity is not allowed, allow workers to freely elect their own representatives with whom the Supplier can enter into dialogue about workplace issues.

## 5. Wages, Benefits and Working Hours

Suppliers must:

- Comply with all laws regulating local wages, overtime compensation, and legally mandated benefits. In any event, wages should always be enough to meet basic needs and to provide some discretionary income.
- Ensure that, under ordinary business circumstances, workers are not required to work excessive working hours per week, including overtime, and have the option of adequate days off.

## 6. Hiring and Regular Employment

Suppliers must:

- Provide each worker with a labour contract, which stipulates all legally required employment terms and conditions. The contract should be provided before employment, be in writing, and signed by the workers.
- Not use labour-only contracting arrangements, consecutive short- term contracts, excessive piece-work or false apprenticeship schemes to avoid obligations of regular employment to workers.
- Not change or terminate contracts to avoid obligations of regular employment to workers.
- Not charge their workers recruitment or employment fees, or otherwise withhold wages.
- If recruitment agents or labour brokers are used, ensure only legally registered/licensed recruitment agents or labour brokers are used and their engagement is subject to a written agreement which ensures compliance with applicable law and this Code.

## 7. Migrant Workers

Suppliers must:

- Ensure that migrant workers have the same entitlement as local workers stipulated by local law and under this Code.
- Act with diligence when engaging and recruiting migrant workers, both directly and indirectly, and ensure all foreign migrant workers are legally eligible to work in the country with valid work permits when required.
- Pay any commissions and other fees in connection with employment of migrant workers upfront.
- Not charge back or accept reimbursement from any migrant worker to recover any commissions or fees it has paid to hire migrant workers.
- Not require migrant workers to surrender their identification documents.

## 8. Discrimination

Suppliers must:

- Provide a working environment where workers are treated fairly and without discrimination.
- Ensure that all conditions of employment are based on an individual's ability to do the job, not on the basis of personal characteristics, such as age, race, ethnicity, colour, nationality, gender, religion, caste, marital or maternity status, sexual orientation, disability or political beliefs.

## 9. Harassment and Abuse

Suppliers must:

- Not engage in or support any form of harassment or abuse in connection with workers' employment, including physical, sexual, verbal or visual behaviour that creates an offensive, hostile, or intimidating environment

## 10. Health and Safety

Suppliers must:

- Have knowledge of, and comply with, all local legal regulations on health and safety.
- Ensure conditions in all production and residential facilities are safe, clean and consistent with all applicable laws and regulations and/or industry best practices, whichever is higher, in order to avoid preventable work-related accidents and injuries.
- Ensure workers are appropriately supervised and trained to perform their jobs safely and receive formal training on safety procedures in general.
- Conduct regular monitoring to check that health and safety procedures are being followed.

## 11. Environment

Suppliers must:

- Ensure all operations are carried out in an environmentally responsible manner and, as a minimum, will meet all relevant local and national environmental protection laws.
- Ensure all legally required environmental permits, licenses, approvals, and / or other registrations have been obtained and are current.
- In the case of Suppliers of goods, have in place a written environmental policy and an environmental management system designed as a minimum to achieve compliance with national environmental protection laws and, where appropriate, to manage environmental impacts associated with production facilities, such as air emissions, water and waste management, energy use and biodiversity impacts. The management system should be developed with reference to internationally recognized standards or initiatives (e.g. ISO 14001).
- Provide training to workers with responsibilities under the environmental policy and management system.
- In the case of Suppliers of goods, use raw materials and components in manufacturing that, where feasible, have been produced in accordance with the principles of environmental sustainability.

## 12. Business Integrity and Anti-corruption

Suppliers must:

- Act with integrity and honesty.
- Not give, offer, accept or request bribes, facilitation payments, secret commissions, or other improper payments or cause any of them to be given, offered, accepted or requested.
- Ensure all record keeping is accurate and transparent at all times.

### 13. Unauthorised Subcontracting

Suppliers must:

- Not sub-contract without prior authorisation.
- Where sub-contracting has been authorised, Suppliers must ensure sub-contractors also comply with the standards of conduct outlined in this Code.

### 14. Compliance Management

Suppliers must:

- Have in place policies and procedures to ensure compliance with applicable laws and this Code.
- In the case of Suppliers of goods, have in place a grievance system available to workers in production facilities to raise concerns or incidents around breaches of labour standards or other issues concerning workplace misconduct. Workers must be made aware and educated on how to use the system and be able to report a grievance in their spoken language. The System must allow for anonymity, confidentiality and ensure non-retaliation for workers who use the system in good faith. Grievance that are reported or raised must be followed up, appropriately and promptly investigated, and properly documented (including investigation outcomes) to demonstrate compliance.
- Have in place policies and procedures to ensure their own suppliers comply with the standards of conduct outlined in this Code.





## Appendix

### A. Definitions

#### Bonded labour

Work for an employer not for compensation received by the worker, but to pay off a debt, which is often incurred by another worker offering the worker's labour in exchange.

#### Child labour

Work undertaken by a child under the age of 15 years of age or the minimum age for work set by local law:

- If set below 15, then no one under the age of 15 is permitted to work other than in accordance with the exceptions allowed by the ILO and national law.
- If set at 15, then no one under 15 is permitted to work; and
- If set above 15, then no one under the age established by law may work.

#### Excessive fees

Fees charged to a worker that is in excess of the amount legally permitted by any applicable law of the host or home country. Or, in the absence of such law, fees substantially above the prevailing market rate.

#### Employment eligibility fees

Fees and costs associated with employment, including recruitment agency/placement firm fees, visas, health checks, work permit and work registration fees.

#### Freedom of association

The right of all workers to join or form a trade union of their own choosing and to carry out trade union activities without interference from their employer or from public authorities.

#### Forced labour

All work or service that is extracted from any person under the menace of any penalty for which the said person has not offered him/herself voluntarily.

#### Grievance procedure

A process or procedure for workers who may feel that they have been treated unfairly to voice their concerns without fear of repercussion.

#### Harassment

Any physical, verbal, sexual, or psychological nature, offensive conduct that threatens human dignity and worker morale.

Hazardous work

Hazardous work includes working: with dangerous machinery/equipment (e.g. knives, saws); with chemicals or hazardous substances; in working conditions which may expose a worker to extreme noise, vibrations, cold or hot conditions; in



## **Hazardous work**

Hazardous work includes working: with dangerous machinery/equipment (e.g. knives, saws); with chemicals or hazardous substances; in working conditions which may expose a worker to extreme noise, vibrations, cold or hot conditions; in dangerously confined spaces; with lifting heavy things.

## **Home worker**

The practice of a worker undertaking work at their place of residence or the residence of a family member.

## **Human rights**

A set of principles defined in the Universal Declaration of Human Rights (1948), based on the recognition of the inherent dignity and the equal and inalienable rights of all members of the human family as the foundation of freedom, justice and peace in the world.

## **Human trafficking**

The recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.

## **Indentured labour**

Work performed on behalf of an employer who forbids workers from leaving employment at the worker's discretion.

## **International Labour Organization (ILO)**

The ILO is the international organisation responsible for drawing up and overseeing international labour standards. It is the only 'tripartite' United Nations agency that brings together representatives of governments, employers and workers to jointly shape policies and programmes promoting Decent Work for all. [www.ilo.org](http://www.ilo.org)

## **ILO Convention 138**

This Convention, concerning Minimum Age for Admission to Employment, was adopted in 1973 by the International Labour Organization. It requires ratifying states to pursue a national policy designed to ensure the effective abolition of child labour and to raise progressively the minimum age for admission to employment or work.

## **Piece rate**

A method of paying workers by the number of items they produce, rather than the number of hours they work.

## **Trade union (or “Union”)**

An organisation of workers that promotes and protects the interests of its members on issues such as wages and working conditions, especially through negotiations with employers.

## Worker

A worker is defined widely to include any person working for or on behalf of a Supplier, including but not limited to, employees, contractors, managers, staff, apprentices, agents, and consultants.

## Young worker (or Juvenile worker)

Any worker over the age of a child as defined by local or national law and under the age of 18.

