Homeworking in the Supply Chain Policy

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Accountable owner:	Chief People Officer
Responsible owner:	Head of ESG

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1. Policy Statement

This Policy establishes a set of principles and rules adopted by The Very Group Limited in relation to Homeworking in the Supply Chain. This Policy is designed to influence all decisions, actions and other activities that relate to its subject matter.

The primary objectives of this Policy are to:

- Outline applicable requirements and The Very Group's commitments relevant to the subject matter of this Policy
- Identify key roles and responsibilities for both The Very Group and its Suppliers
- Define how The Very Group will comply with the above requirements

Scope
This policy applies to The Very Group's entire supply chain.

Related Policies
The Very Group Code of Conduct
Access to Remedy and Grievance Mechanism Policy
Child Labour and Young Worker Policy

Additional Information
ILO Convention on Homeworking, 177
United Nations Guiding Principles on Business and Human Rights (UNGPs)
OECD Due Diligence Guidelines for Responsible Business Conduct
ETI Base Code

2. Background

As members of the Ethical Trading Initiative (ETI), the ETI Base Code applies to all workers in our business and supply chain and sets out a minimum standard for labour standards. The Very Group is committed to improving working conditions in our supply chain, including those parts of the supply chain which are the most difficult to reach, such as homeworkers.

The Very Group believes that one of the first steps towards reducing the insecurity around homeworkers is to take an open and positive position towards homeworking. Homeworkers exist in many supply chains in various sectors and are generally employed informally in a precarious position. Many are underpaid and need employment security. The vast majority are women balancing paid work with domestic and family responsibilities and who have few practical alternatives to homeworking.

The Very Group believes that homeworking can make a positive contribution to production and livelihoods while providing valuable flexibility, particularly for workers in rural areas, those with caring responsibilities and domestic duties and others who may face barriers to employment in traditional workplace settings.

3. Definitions

Homeworker
A person who carries out work in their home or in other premises of their choice, other than the workplace of the employer, for remuneration, which results in a product or service as specified by the employer, regardless of who provides the equipment, materials or other inputs used, unless this person has sufficient autonomy and economic independence to be considered an independent worker under national laws, regulations, or court decisions (ILO Convention on Homeworking, 1996, C177).

This does not include employees who only occasionally work from home as part of their regular employment.

Employer

A legal entity that provides any form of work in return for remuneration, including permanent, temporary, casual or informal, full or part-time work.

Intermediary
An individual, organisation or entity that acts as a middleman or facilitator between the supplier and the homeworker.

Supplier
An organisation that manufactures or procures goods or services on behalf of The Very Group.

4. Key requirements

The Very Group is committed to upholding the requirements of this Policy and expects all suppliers to comply with its standards and requirements. The Very Group and its suppliers must comply with all applicable laws and regulations, and where national law differs from international standards, apply the higher standard where legally permissible.

The Very Group acknowledges that homeworkers deserve equal treatment with other workers, as set out in the ILO Convention on Homeworking (1996, C177). This encompasses aspects such as remuneration, health and safety, the right to organise, social security protection, access to training, and protection against discrimination. This Policy aims to ensure parity between homeworkers and other wage earners, considering the unique nature of homework and aligning conditions where applicable with those in an enterprise.

Key requirements of this Policy are:

- Homeworkers must be treated fairly including in remuneration, working conditions and other social protections where applicable
- Suppliers must identify and disclose the use of homeworkers within their operations and supply chains

5. What does this mean to The Very Group?

The Very Group will support our suppliers who provide transparency, disclose any discoveries or risks within their operations or supply chain, and actively engage with us in ongoing due diligence and delivering remediation where necessary. The Very Group recognises that suppliers and factories may require support to implement the requirements of this Policy and is committed to providing appropriate guidance to drive compliance and continuous improvement.

This Policy communicates our position towards homeworking in our supply chains and provides our suppliers with guidance in delivering our requirements and expectations to support homeworkers in our supply chain. We believe that one of the first steps towards reducing the vulnerability of these workers is to take an open and positive position towards Homeworking and accept its presence in our supply chain.

The Very Group is committed to:

- Communicating our position on homeworking throughout our supply chain
- Ensuring that the presence of homeworkers in the supply chain will not lead to the relocation of work or the cancellation of orders,
- Mapping homeworkers in our supply chain and ensuring that they are treated fairly and meet minimum age requirements
- Working together with our suppliers:
    - to achieve sustainable improvements in labour conditions for homeworkers in our supply chains
    - to remediate any evidence of exploitation with clear timeframes for action
    - to ensure our procedures for monitoring conditions are fully understood

6. What does this mean for suppliers?

The Very Group requires all suppliers in the supply chain to adopt and implement this policy. Suppliers are expected to monitor and conduct due diligence on their own operations and supply chains to identify, prevent, mitigate and address risks regarding homeworkers. Suppliers must provide full transparency on current practices and must notify The Very Group

immediately if they become aware of or suspect any instance of non-compliance with our requirements.

When working with homeworkers, the Supplier is fully responsible for ensuring compliance with the following requirements:

- Declare where homeworking is used within supply chains manufacturing product for The Very Group prior to commencing orders
- Where homeworking is present, work with The Very Group to develop an action plan for improving labour conditions for homeworkers if they are found to be below those set out in international labour standards and The Very Group Code of Conduct, and to involve homeworkers and/or their representatives in this process
- Ensure that homeworkers are paid at least the applicable minimum wage, on time and payment records are well maintained and available for review upon request by The Very Group
- Maintain age verification records for all homeworkers and ensure that no children are engaged with as homeworkers in line with applicable laws and our Child Labour and Young Workers Policy
- Ensure that homeworkers have access to remedy and effective grievance mechanisms, including contact details for factory HR representatives
- Adopt a shared Policy of acceptance of homeworking and commitment to improving homeworkers' labour conditions where these do not meet those set out in the ILO Convention on Homeworking (1996, C177) and The Very Group Code of Conduct
- Communicate this Policy to all those in the supply chain, including homeworkers in their local language.

Use of Intermediaries

The use of intermediaries is common practice in homeworking supply chains.

We accept the use of intermediaries however, it is the responsibility of the supplier to:

- Establish transparency of all tiers of intermediaries between the supplier and the homeworker, to document this and share with The Very Group upon request,
- Engage intermediaries in training on their obligations under this Policy and in compliance, with local law and in accordance with The Very Group Code of Conduct,
- Establish contractual relationships with intermediaries stipulating expectations

including:

- Compliance with all relevant national laws,
- Standards to be upheld in business operations and the outsourcing of work to homeworkers,
- Record-keeping for all homeworkers including family members, work distributed to the homeworker, payments made to the homeworker and detail of benefits paid.

If the Supplier is found in breach of this Policy, then The Very Group reserve the right to suspend the relationship until these issues are rectified. If suitable progress is not made in remediating issues found, then The Very Group may cease our trading relationship with the supplier indefinitely.