



Social Compliance Policy

CW on Demand 2022



CW on Demand as a Workplace

At each of our fulfillment sites (UK, US, AU, NL, HK), Head Office (UK), and our Research and Development Site (HK), we have been hiring from the local community; through each level of employment hierarchy.

We work closely with local governments at each location to create hundreds of jobs for each site. At the Netherland fulfillment site, we work with the government to help refugees, who have language barriers preventing them from communicating in other workplaces. CW has a strong team-led culture that encourages a “growth mindset” in everything we do, we lead change to help our customers succeed.

With locations around the world, we have a Code of Conduct and an Employee Handbook providing all of our team with the same benefits. We make sure everyone is aware that we have flexible working hours, holidays, and parental leave, across all our locations. We operate as one team and we believe in treating everyone equally.

Forced Labour

We shall use no forced labor, including prison labor, indentured labor, bonded labor, or any other forms of forced labor. We shall comply with international standards and all applicable local and national laws, regulations, standards, and procedures concerning the prohibition of forced labor and human trafficking.

Child Labour

We shall only employ workers who are at least the highest of the following ages: (i) the age of 15 (or 14 where, consistent with International Labor Organization practices for developing countries, the law of the country of manufacture allows such exception); (ii) the age for completion of compulsory education; or (iii) the local minimum age for employment. No person under the age of 18 shall undertake hazardous work (i.e., work which, by its nature or the circumstances in which it is carried out, is likely to cause harm to the health or safety of such person). We shall work with governmental organizations, human rights, and NGOs to minimize the negative impact on any child released from employment as a result of the enforcement of this Code of Conduct.

Harassment or Abuse

We shall treat every employee with respect and dignity. No employee shall be subject to any physical, sexual, psychological or verbal harassment or abuse. We shall neither use nor tolerate any form of corporal punishment.



Nondiscrimination

We shall not discriminate against any person in employment matters (including hiring, compensation, advancement, discipline, termination or retirement) on the basis of gender (e.g., gender expression, gender identity, sexual orientation, pregnancy), race (e.g., nationality, ancestry, social or ethnic origin, citizenship), religion, age, political opinion, physical or mental disability (e.g., medical condition (cancer-related or genetic characteristics), genetic information including family medical history), marital status, or service in the uniformed services, and shall act in compliance with state and federal regulations.

Health, Safety & Environment

We shall provide employees with a safe and healthy workplace setting (i) to prevent accidents and injury to health arising out of, linked with or occurring in the course of work or as a result of the operation of our facilities, in compliance with all laws, regulations or standards applicable to our business, and (ii) with working conditions that do not pose a risk of serious harm, that are free of known dangers and/or serious recognized hazards. In the event of any conflict between the provisions of any of the aforementioned applicable laws, regulations or standards, We shall apply the higher standards. We shall find and correct safety and health problems, and try to eliminate or reduce hazards in the working environment. We shall ensure, at a minimum, (i) reasonable access to potable water and sanitary facilities, (ii) fire safety, and (iii) adequate lighting and ventilation. Additionally, We shall adopt responsible measures to mitigate negative impacts that the workplace has on the environment.

Whistleblower Protection

We shall ensure that our employees are able to use their rights under the law to either report or refuse to participate in activities or conditions that would result in a violation of a state or federal statute, rule or regulation, without retaliation and discrimination. We shall not make, adopt or enforce any rule, regulation or policy preventing an employee from being a whistleblower. We shall not retaliate against an employee for having exercised their rights under the law.

Freedom of Association

We shall recognize and respect the right of employees to freedom of association and collective bargaining with bargaining representatives of their own choice in accordance with International Labour Organisation Convention 87, which protects freedom of association and the right to organize. No employees shall be subject to harassment, intimidation or retaliation as a result of their efforts to freely associate or bargain collectively. We shall allow union organisers reasonable access to employees and must recognise the union of the employees' choice.



Hours of Work

Except in extraordinary business circumstances, our hourly and/or quota-based wage employees shall (i) not be required to work more than the lesser of (a) 48 hours per week and 12 hours overtime or (b) the limits on regular and overtime hours allowed by the law of the country of manufacture or, where the laws of such country do not limit the hours of work, the regular work week in such country plus 12 hours overtime; and (ii) be entitled to at least 24 consecutive hours of rest in every 7-day period. We shall ensure that any piece-rate quotas are adjusted to what can reasonably be accomplished during an 8-hour period. All overtime work shall be consensual. We shall not request overtime on a regular basis and shall compensate all overtime work at a premium rate as is legally required in the country of manufacture or, in those countries where such laws do not exist, at a rate at least equal to their regular hourly compensation rate.

Compensation

Every worker has a right to compensation for a regular work week that is sufficient to meet the worker's basic needs and provide some discretionary income. We shall pay at least the minimum wage or the appropriate prevailing wage, whichever is higher, comply with all legal requirements on wages, and provide any fringe benefits required by law or contract. Where compensation does not meet workers' basic needs and provide some discretionary income, we shall work to take appropriate actions that seek to progressively realize a level of compensation that does.

Equal Rights

We believe that assuring and safeguarding equal rights is of particular importance, and so, in addition to the safeguards detailed above, shall abide by the following specific guidelines:

1. All workers will receive equal remuneration, including benefits, equal treatment, equal evaluation of the quality of their work, and equal opportunity to fill all positions regardless of gender or any other protected classes;
2. Pregnancy tests will not be a condition of employment, nor will they be demanded of employees. Workers will not be forced or pressed to use contraception;
3. We shall provide, and ensure that our subcontractors provide, appropriate services and accommodations to female workers in connection with pregnancy. Workers who take maternity leave will not face dismissal nor threat of dismissal, loss of seniority or deduction of wages due to pregnancy, and will be able to return to their former employment at the same rate of pay and benefits; and
4. Female workers will not be exposed to conditions that endanger their reproductive health (e.g., exposure to hazards, including glues and solvents that may endanger their safety), unless thorough protections are in place.



Anti-Corruption

We shall comply with all laws, rules and regulations governing bribery and corruption in all countries in which we do business. Any gifts and/or entertainment given or received by us (including company officers and senior leadership) must (i) be in compliance with law, (ii) not violate the giver's and/or receivers policies on the matter and (iii) be consistent with local custom and practice. We do not solicit gifts, entertainment, or favors of any value from persons or firms with which we do or may potentially do business. We never act in a manner that could cause any vendor or customer to feel obligated to make a gift, provide entertainment, or provide personal favors in order to do or continue to do business with us.

In addition to the code of conduct provisions above

We confirm that: (i) We have informed our employees about the workplace standards both orally and through the posting of standards in a prominent place, and have undertaken other efforts to educate employees about the standards on a regular basis. We will be subject to periodic compliance audits by their monitors or external monitors, and agree to allow them to enter our facility(ies) to interview managers and workers, review company records and inspect factory and dormitory buildings.