

PURPOSE AND INTRODUCTION

To ensure that the working hours of all employees at Strauss Brands comply with national laws, industry standards, and the provisions of the Ethical Trading Initiative Base Code, thereby guaranteeing that working hours are not excessive and do not lead to exploitation

RESPONSIBILITY

This procedure applies to all employees of Strauss Brands, across all locations and departments, including direct hires, temporary staff, and contracted workers

POLICY STATEMENTLegal Compliance:

- ★ Review and understand the legal requirements related to working hours, overtime and rest periods in each jurisdiction where Strauss Brands operates
- ★ Ensure that standard working hours do not exceed legal limits and that all overtime work is voluntary and compensated at a premium rate as per legal standards

Work Schedule Management:

- ★ Develop and implement work schedules that comply with the Base Code's stipulation that regular working hours shall not exceed 48 hours per week, with overtime not exceeding 12 hours per week
- ★ Provide at least one day off for every seven-day period, ensuring compliance with legal requirements and the Base Code

Overtime Monitoring and Control:

- ★ Require managerial approval for any overtime, ensuring it is justified, voluntary, and does not frequently exceed the Base Code recommendations
- ★ Implement a system to accurately record all hours worked, including overtime, for every employee

Rest and Break Periods:

- ★ Clearly define and communicate the rest and break periods for employees within standard working hours
- ★ Ensure that all employees are aware of and able to take their entitled rest breaks and meal breaks without any restrictions

Health and Safety Considerations:

- ★ Conduct regular assessments to determine if excessive working hours are posing a risk to employees' health and safety
- ★ Take immediate action to modify work schedules if any health or safety risks are identified

Employee Consultation:

- ★ Engage with employees and, where applicable, their representatives to negotiate working hours, including shift patterns and overtime
- ★ Encourage feedback on the impact of working hours on personal well-being and work-life balance

Communication:

- ★ Clearly communicate this procedure and any changes in work schedules to all employees in a timely manner
- ★ Ensure that all employees have access to their work schedules, including any changes, well in advance of implementation

Compliance Auditing:

- ★ Perform regular audits to ensure adherence to the working hours procedure
- ★ Review punch-in and punch-out records, and any discrepancies identified during audits should be investigated and resolved

Grievance Mechanism:

- ★ Establish a formal grievance mechanism through which employees can report concerns about excessive working hours without fear of retaliation
- ★ Ensure that all grievances are investigated promptly and corrective actions taken where necessary

Training and Awareness:

- ★ Provide training to managers and supervisors on the importance of regulating working hours and the potential impacts of excessive work hours on employee well-being
- ★ Raise awareness among employees about their rights regarding working hours and overtime

Continuous Improvement:

- ★ Regularly review and update this procedure to incorporate feedback from employees, audit findings, and changes in labor laws or industry standards
- ★ Strive for continuous improvement in work schedule management to ensure the health, safety, and satisfaction of all employees

Documentation and Record Keeping:

- ★ Maintain accurate and up-to-date records of working hours, overtime, and rest periods for all employees
- ★ Keep these records for a minimum period as required by law, and make them available for inspection by relevant authorities

Policy Enforcement:

- ★ Enforce this procedure across all levels of the organization
- ★ Hold managers and supervisors accountable for the implementation of and adherence to this procedure

In Conclusion, the successful implementation of this procedure will involve regular training, clear communication, strict monitoring, and an open-door policy for employees to raise concerns. Regular review and feedback sessions will also help Strauss Brands to adapt the procedure to changing needs and conditions

IMPLEMENTATION AND COMPLIANCE

- ★ Risk Assessments: We will conduct regular human rights impact assessments to identify, prevent, mitigate, and account for how we address our impacts on Regulation of Working Hours
- ★ Training and Awareness: We will provide training and/or resources to our employees to ensure they understand and can implement this policy effectively
- ★ Grievance Mechanism: Strauss Brands will establish a grievance mechanism for employees and other stakeholders to report human rights concerns without fear of retaliation
- ★ Monitoring and Reporting: Compliance with this policy will be regularly monitored and results will be included in our annual sustainability report
- ★ Continuous Improvement: We are committed to continuously improving our practices to support human rights, seeking dialogue with our stakeholders, and learning from best practices

RESPONSIBILITY AND REVIEW

The ultimate responsibility for this policy lies with the senior leadership of Strauss Brands. This policy will be reviewed annually and updated as needed to ensure relevance and effectiveness in representing our employees' rights and interest

RESOURCES AND REFERENCE MATERIAL

- [ETI Base Code Guidance: Working Hours](#)
- [Revised ETI Base Code Clause 6](#)
- [C001 - Hours of Work \(Industry\) Convention, 1919 \(No. 1\)](#)
- [C030 - Hours of Work \(Commerce and Offices\) Convention, 1930 \(No. 30\)](#)
- [C106 - Weekly Rest \(Commerce and Offices\) Convention, 1957 \(No. 106\)](#)
- [C014 - Weekly Rest \(Industry\) Convention, 1921 \(No. 14\)](#)



REVISION DATE

REASON FOR CHANGE

APPROVED BY

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| PROGRAM NAME | P 006 ★ Regulation of Working Hours |
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| 10.27.2023 | Release | Elsa Kastrul |
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