



HUMAN AND LABOUR RIGHTS POLICY

A) Introduction

LUPC is committed to advancing Responsible Procurement (RP), which includes respect for both people and the environment in our direct operations and supply chains of our Framework Agreements. This policy sets out LUPC's approach to the social aspect of RP, and in particular managing human and labour rights risks.

This policy supports the LUPC Corporate Strategy. It includes actions LUPC has taken and those it is planning to take to identify and manage risks, as well as to respond to potential and actual instances of abuse.

It is informed by the [UN Guiding Principles on Business and Human Rights](#),

B) Principles

The principles of the policy are as follows:

- We acknowledge our responsibility to respect human rights, including avoid infringements on the rights of others and addressing adverse human rights impacts where these might occur.
- It is our express intention to work in collaboration with suppliers, members, affiliates and other civil society organisations for the prevention, mitigation, and where appropriate worker-centred remediation of any human and labour rights abuse occurring within the organisation and the framework agreement supply chains we manage, even if we have not contributed to those abuses ourselves.
- This policy covers all internationally recognised human and labour rights. This includes, but is not limited to:
 - The International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights)
 - The ILO fundamental rights defined by the [ILO Declaration on Fundamental Principles and Rights at Work \(1998\), as amended in 2022](#), and [ILO Conventions](#)¹
 - The principles contained in the Sustain Supply Chain of Conduct.

C) Practical steps

1) Identifying risks

We use the [UKUPC Responsible Procurement Commodity Mapping Tool](#) as a first step in highlighting potential social risks across the LUPC Framework Agreements:²

¹ UN Guiding Principles, Principle 12 and commentary

² Categories as per HEPA Risk Analysis

- Modern Slavery
 - Forced labour
 - Child labour
 - Human trafficking
 - Bonded labour
 - Servitude
 - Criminal exploitation
- Workers' rights
 - Freedom of association and the right to collective bargaining
 - Social protection
 - Wages and benefits
 - Hours of work
 - Safe, healthy and hygienic working environment free of harassment or abuse
- Equality
 - Freedom from discrimination based on protected characteristics: age, gender reassignment, marital status, pregnancy, maternity leave, disability, race including colour, nationality, ethnic or national origin, religion or belief, sex, sexual orientation³
 - Equal pay for equal work
- General Data Protection Regulation
 - Lawfulness, fairness and transparency
 - Purpose limitation
 - Data minimisation
 - Accuracy
 - Storage limitation
 - Integrity and confidentiality

2) Managing risks

- The Senior Category Managers (SCM) and Responsible Procurement Lead (RPL) review risk using the above-mentioned HEPA Risk Matrix prior to any tender activity.
- Risks are outlined in the Sourcing Strategy developed by the SCM.
- Pre-market engagement where risks can be better understood, is conducted where appropriate.
- The tendering process includes evaluation of human rights risks as per the Sourcing Strategy and other key criteria for evaluation and contract award.
- Suppliers appointed to framework agreements sign binding contractual terms and conditions, including the SUSTAIN Code of Conduct and participation in LUPC's supplier due diligence programme.
- Contract Management includes an annual review and monitoring of progress across LUPC's RP themes and corrective actions agreed with suppliers.
- LUPC collaborates on human and labour rights issues with consortia, Electronics Watch and Unseen.

3) Responding to instances of abuse

³ Equality Act 2010

LUPC recognises that long-term engagement with business entities in global supply chains supports systemic change, where effective remedy can become a reality for rights-holders. LUPC commits to being proactive in this engagement through its affiliations and partnerships.

As a small organisation, LUPC acknowledges that it is unlikely to have the resources, capacity and knowledge to investigate concerns and provide effective remedy for rights-holders on its own. However, if violations are reported, LUPC is committed to working with civil society partners, affiliates and suppliers to ensure investigation takes place and is committed to support continuous follow up to achieve worker-centred remedy:

- In the electronics industry, LUPC commits to engaging with Electronics Watch when abuses are identified, to increase pressure on suppliers to provide effective remedy.
- LUPC facilitates reporting to the UK Modern Slavery Helpline run by Unseen via a form on our website and publishing of the helpline number. LUPC commits to following up reports from Unseen, where abuses are identified and supporting their work towards achieving worker-centred remedy.

LUPC will support suppliers to meet the terms of remediation agreed and will only terminate a contract as a last resort, if the suppliers are not collaborative and are obstructive. If termination is considered, priority will be given to the potential further negative impact on rights-holders affected by the harm.

4) Training

Training on this policy and human rights in general will be included in LUPC team development plans, supplier and member support programmes. We will include specialist organisations, such as Electronicswatch, Unseen and the Business, Human Rights and Environment Research Group (BHRE), in development programmes and ensure opportunities for exposure at LUPC conferences and sharing of resources through our communication channels.

5) Key Performance Indicators (KPIs) and public reporting

We publish our annual Modern Slavery Statement on our website, which includes targets and progress against defined KPIs.

6) Reviews

LUPC commits to reviewing and updating this policy no later than every 5 years. It reserves the right to update it earlier, as necessary.

7) Implementation responsibilities

Day-to-day responsibilities for this Policy belong to the Responsible Procurement Lead. Overall responsibility for this Policy belongs to LUPC's Board of Directors.



Don Bowman
LUPC Director
May 2025

Review interval	Next review due by	Next review start
Annually	April 2025	March 2025

Version history

Version	Date	Changes	Reviewed by	Approved by
1	April 2024	-	Responsible Procurement Lead LUPC Deputy Director LUPC Director	LUPC Director
2	May 2025	Various	Responsible Procurement Lead LUPC Deputy Director LUPC Director	LUPC Director