



‘not just what to do, but more importantly how to do it.’

Ethical Trading & Worker engagement Policy

This Policy is not intended to act as or replace existing operational procedures.

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Policy Statement

(The Company) recognises the responsibility that they share with their suppliers to operate ethically. Promoting decent working conditions in our supply chains is part of our strategy to act in a socially responsible manner. In pursuit of our aims, we require that all our suppliers comply with our Ethical Trading Policy, which is based on the Fundamental Conventions of the International Labour Organisation (ILO) and national and international laws.

We expect all our suppliers to have ethical processes and policies in place throughout their supply chain. We will monitor supplier compliance with this policy through [insert method] and/or through a range of other tools to support the risk management, continuous improvement and capacity building of our suppliers, including the requirements for suppliers to provide reasonable information as evidence of compliance to with our Ethical Trading Policy & Worker engagement policy. Within this policy our expectations for how we communicate with workers through our business and throughout our partnerships through the supply chain are outlined.

Scope & Coverage

Working collaboratively with our clients, workers, and governing bodies, is the key to delivering high standards ensuring full compliance, and a safe, secure work environment for our workforce. Having robust processes in place to protect workers whilst minimizing the risk to our business and those in our supply chain and helping disrupt & prevent illegal criminal activity is our priority. The scope of this policy is to ensure that all workers are treated fairly at all points through the supply chain and have access to remedy when relevant, whilst operating with integrity, openness and honesty to meet high ethical standards. All company and associated business representatives who directly engage in either recruiting workers or manage them on a day-to-day basis must adhere to this policy.

Policy Commitments

All company representatives and supply chain partners shall commit to ensure that:

1. Employment is freely chosen

1.1 There is no forced, bonded or involuntary prison labour.

1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

2. Freedom of association and the right to collective bargaining are respected

2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.

2.3 Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.

2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

3. Working conditions are safe and hygienic

3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

3.5 The company observing the code shall assign responsibility for health and safety to a senior management representative.

4. Child labour shall not be used

4.1 There shall be no new recruitment of child labour.

4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; "child" and "child labour" being defined in the appendices.

4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.

4.4 These policies and procedures shall conform to the provisions of the relevant ILO standards.

5. Living wages are paid

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards, or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

6. Working hours are not excessive

6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.

6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week. *

* International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced.

6.3 All overtime shall be voluntary. Overtime shall be used responsibly, considering all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.

6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below.

6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where all of the following are met:

- this is allowed by national law;
- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce,
- appropriate safeguards are taken to protect the workers' health and safety; and
- the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies

6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14 day period.

7. No discrimination is practised

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

8. Regular employment is provided

8.1 To every extent possible work performed must be based on recognised employment relationship established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided using labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

9. No harsh or inhumane treatment is allowed

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

Requirements

For the above, the following principles must be always undertaken to minimize any risk of 3rd party exploitation and to ensure fair treatment for all workers.

- All workers must be met with either in person by a Company representative and must complete the registration documents at the time of interview or following an online application.
- To ensure you remain fully compliant, all documentation must be completed by the worker, not by someone on their behalf. If in the situation of a physical application form being completed at the time of interview, it is your responsibility to make sure that the applicant completes it on their own.
- Throughout the employment relationship, direct communication must be made by the Company's representative to the worker and must not be made through any third party (even if it's a relative or friend).
- The Company actively discourages any payment from workers for work finding fees of any kind.
- At no point during the worker's time with the Company, should the worker's identification documents be from them and held by the Company.
- Great care should be taken when processing payroll for workers to make sure that they are paid correctly, every time. If there is an exceptional instance of any missing hours spotted or reported in from a worker, it must be rectified as quickly as possible to cover the full payment owed to the worker.
- All workers are to be paid at least the National Minimum Wage, and all time for work related duties is to be paid to the workers, this includes training and any changing into PPE processes.
- All workers have access to remedy; they have access to grievance procedures and third-party confidential help line if available.
- All complaints are taken seriously, investigated, and logged, and resolved swiftly and efficiently.

Responsibilities

All line managers are responsible for making sure that their teams are aware of the requirements of this policy. Monitoring risks and taking appropriate action and preventative steps to mitigate such risks & reporting and escalating all concerns for the health, safety, and welfare of any individuals without delay.

All employees are responsible for reading this policy and ensuring clear understanding of its contents and complying with the requirements of this policy.

Monitoring & Action

This policy will be reviewed annually and updated from key learnings throughout business cases as and when appropriate and shared through the business.

Anyone found in breach of the principles listed in the policy commitments will be investigated and subsequent action taken to address and escalate any issues identified.

Signature Page

Senior leadership team

Date _____

Date _____

Date _____