



Ethical Sourcing Policy

As a responsible employer we fully support and work alongside the principles outlined in the Ethical Trading Initiative Base Code. We aim to offer employment and development to the widest range of people. We want to develop effective working partnerships with partners in order to provide decent working conditions for anyone involved in the production of our products.

This policy supports the principles outlined in the United Nations Guiding Principles (UNGP) on Business & Human Rights.

We believe in the motivation, skills, innovative spirit and the sense of responsibility of our employees. We strive to provide a safe and healthy working environment for our employees, ensuring their physical well-being. Complying with health and safety rules is everybody's responsibility. We uphold the principles of respect and fairness in working relationships and in our recruitment and training procedures. We strongly condemn any form of harassment. We also strive to respect our employees' work-life balance. The diversity of our sites and expertise is one of the company's strengths. We encourage this diversity and do not tolerate any form of violence, defamation or discrimination.

Status of this procedure

This procedure applies to all employees, both current & prospective.

This procedure does not give contractual rights to individual employees. The company reserves the right to review this procedure from time to time.

General principles

Employment is freely chosen

The exploitation of any employee is unacceptable; we will ensure that anyone who works for us shall do so freely. There is no forced, bonded or involuntary prison labour.

All employees must have authority to work in the United Kingdom and copies of the appropriate documentation will be taken and kept on file throughout employment. No original documents will be retained and all employees shall be free to leave employment after reasonable notice. Employees are not required to lodge "deposits" or their identity papers

Freedom of Association and Collective Bargaining

All employees have the right to join or form trade unions of their own choosing. We have an open attitude towards the activities of trade unions and their organisational activities.

Employee representatives will not be subject to any discrimination and will have reasonable access to carry out their representative functions in the workplace.

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Working Conditions are safe and hygienic

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 minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

We have appointed a Health and Safety representative within the business structure to ensure the above conditions are maintained and improved.

Employees shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned employees.

All employees have access to clean toilet facilities and to potable water, and sanitary facilities for food storage are provided. Any accommodation provided is clean, safe, and meet the basic needs of the employees.

Child Labour shall not be used

We will not engage or support the use of child labour.

Under 18 year olds are not permitted to operate any machinery or work in any hazardous areas, or at night. Only responsible and competent people shall be employed by the Company.

Work experience placements for young people aged under 18 are risk assessed prior to the placement start date and the young person will have full supervision whilst working on site regardless of the area or nature of the work.

Should we find that child labour has occurred we will work with the relevant agencies as part of remediation.

The National Living Wage will be paid

We review wages of all staff on an annual basis and pay on or above the national living wage, regardless of age. We benchmark against other members of the industry and endeavour to remain competitive.

We will always meet the minimum legal standards, aiming to exceed them.

All employees 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.

Deductions from wages will only be permitted with the written consent of the individual employee. All deductions will be recorded.

Working Hours Are Not Excessive

Working hours comply with national laws and benchmark industry standards, whichever affords greater protection. Employees shall not on a regular basis be expected to work for more than 48 hours per week and shall be provided with at least one day off in any seven day period.

Each employee receives a minimum of 28 days annual leave inclusive of the bank holidays that are in each Annual Leave year. If additional bank holidays are organised the employee is also entitled to this allocation. Overtime (i.e. periods worked in excess of 48 hours per week), shall be voluntary, normally to meet exceptional business circumstances and should be remunerated.

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No Discrimination Is Practised

There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation. These standards are outlined in our Recruitment and Equality Policies.

Regular Employment Is Provided

Any work should be on the basis of a recognised employment relationship identified by law and/or practice. We will not avoid our obligations to employees under labour or social security laws by unreasonably using devices such as labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no intention of imparting skills or providing regular employment or the excessive use of fixed-term contracts of employment.

No Harsh or Inhumane Treatment is allowed

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

Employer Pays Principle

We believe no worker should pay for a job – the costs of recruitment should be borne not by the worker but by the employer. Individuals are responsible for determining their right to work and paying any personal visa costs. Cost of transportation to the country / place of work is the responsibility of the individual. We will state this on adverts when recruiting and will also carry out worker interviews on a random basis to confirm this.

Continuous Improvement

We will always try to achieve continual improvement in the workplace and employment standards through partnership with our employees and any other relevant bodies.

Monitoring

We will:

- Ensure a senior manager is assigned responsibility for ensuring compliance with the Ethical Sourcing Policy and ETI Base Code. This will normally be the Site HR Manager
- Audit our Labour Providers to ensure compliance with our standards
- Communicate the policy to all employees, as well as to all suppliers of goods and services.

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- Make appropriate human and financial resources available to meet its stated commitments, including training and guidelines for relevant personnel.
- Provide guidance and reasonable non-financial support to suppliers who genuinely seek to promote and implement the Code standards in their own business and in the relevant supply chains, within available resources.
- Adopt appropriate methods and systems for monitoring and verifying the achievement of the standards.
- Seek to maximise the beneficial effect of the resources available, e.g. by collaborating with other Non Governmental Organisations, and by prioritising the most likely locations of non-compliance.

Our Suppliers Will:

- Accept responsibility for labour and environmental conditions under which products are made and services provided.
- Assign responsibility for implementing the Policy to a senior manager.
- Complete a written questionnaire produced by us to ensure compliance to the policy, and / or be part of the ethical audit process.
- Report progress in implementing the policy annually.

Remediation

Should we find the rights of any of our current or prospective employees has been compromised we will work with the relevant agencies as part of remediation. As a Company we have partnerships with the GLAA, ALP (Association of Labour Providers), local police and community groups.

We will work with these partners to meet the requirements of the victims if applicable. Where child labour is involved we will ensure ongoing liaison and engagement with the stakeholders and local authorities. Suppliers who fail to address adverse human rights impacts will be delisted. We also expect our suppliers to have effective remediation procedures in place.

Appropriate steps will be taken to prevent reoccurrence.

Links to other policies

- Agrial Code of Conduct
- Recruitment Policy and Procedure
- Responsible Recruitment Commitment
- Equality Policy

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Human Rights Policy

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