

Ethical Trading Policy

Introduction

The Ethical Trading Policy (Anti-Slavery and Human Trafficking) policy sets out the company's actions to understand all potential modern slavery risks related to its business and to put in place steps to ensure there is no slavery or human trafficking in its own business and its supply chain. This policy will be made available to all employees.

Responsibilities

We will take the necessary steps to ensure slavery and human trafficking are not taking place in our supply chain, labour force or any part of our business. We oppose using slavery or human trafficking and fully support promoting ethical and lawful business practices within our workplace.

We will not tolerate or condone any practice that constitutes slavery or human trafficking. To this end, we shall conduct due diligence, audit, and implement safe reporting mechanisms. We will adhere to the Modern Slavery Act 2015 and Ethical Trade Initiative (ETI) guidelines in all areas where people are at potential risk.

Our Supply Chain and Labour Force

Our supply chain is an integral part of our success and our culture. We expect each of our business partners to conduct their business with the same commitment, and to this end, we will assess all suppliers to our business.

The workplace practices that we expect from ourselves and our suppliers include:

- not to use slave labour, illegal child labour or forced labour
- ensuring that the overall terms of employment are voluntary
- following all local applicable laws about minimum age requirements, wages, overtime and benefits
- following all local applicable laws about the number of hours worked in a seven (7) day week
- periodically certifying that they conform to the expectations described above and that all materials incorporated into their products comply with the laws regarding human trafficking and slavery.

Suppliers must be able to demonstrate compliance with this Policy at the request and satisfaction of the Company. We will occasionally conduct audits and surveys of our workforce and supply chains to evaluate and address the risks of human trafficking and slavery.

Relevant Policies

We actively encourage our employees, suppliers and customers to follow our guidance in our Whistleblowing policy should there be any claim or indication of human trafficking or slave labour.

Any claim or indication of human trafficking or slave labour will be taken seriously and promptly investigated by Human Resources under our Disciplinary Policy and Procedure and with the support of external agencies as and when required.

If any policy violation is found, the Company will take prompt, remedial measures to address the violation.

We will provide ongoing training and support to our employees should it be necessary to apply this policy correctly.

In the Workplace

Human Resources will carry out all necessary checks, as set out in our Recruitment Policy, on all staff who apply to work at the Company. Human Resources will conduct spot checks across the company to ensure compliance with anti-slavery or human trafficking laws.

Human Resources will investigate carefully and sensitively any claims of slavery or human trafficking within the company and advise on the best course of action to take in accordance with their professional code of conduct. Human Resources will ensure managers are adequately informed and trained on this policy to achieve company expectations and standards.

The Organisation will ensure that any future changes to this policy will be reviewed and agreed upon by the Directors.

This policy will be reviewed on an annual basis and amended in accordance with any changes to the Modern Slavery Act 2015 or the Ethical Trading Initiative.