

Ethical Policy

Scope

This policy applies to all employees and workers within the business which includes agency workers or sub-contracted labour providers (“workers”).

Child Labour

The Company does not accept child labour in any form whatsoever.

The Company supports the United Nations (U.N.) Convention on the Rights of the Child (1989).

The Company child labour policy is based on this Convention, which stipulates:

- “All actions concerning the child shall take full account of his or her best interests” Article 3.
- “The right of the child to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child’s education, or to be harmful to the child’s health or physical mental, spiritual, moral or social development”. Article 32.1

This policy is also based on the International Labour Organisation (ILO) Minimum Age Convention no. 138 (1973): the word “Child” is defined as any person below 15 years of age, unless local minimum age law stipulates a higher age to work or mandatory schooling, in which case the higher age would apply. In the UK this is defined as any person below 18 years of age.

Where national law or regulations permit the employment of persons between the ages of 13 to 15 years in light work, such employment should not interfere with schooling nor be harmful to their health or development; where children are subject to compulsory education laws, they shall work only outside of school hours during normal day-time working hours.

No person under the age of 18 is employed in hazardous or heavy work except for the purpose of training within approved national laws and regulations.

This Policy also incorporates the ILO Convention on the Worst Forms of Child Labour no. 182 (1999).

- We shall take immediate and effective measures to prevent and eliminate the engagement of children in the worst forms of child labour, including debt bondage, serfdom, forced or compulsory labour, and all forms of slavery and practices similar to slavery, such as the sale and trafficking of children.
- There will be no employment of any person below eighteen years of age unless authorised by the Managing Director. A Young Person’s Risk Assessment will be conducted prior to employment commencing.

Forced and Compulsory Labour

Coercion

- Freedom of Employment: all workers shall have the right to enter into employment voluntarily and freely, without the threat of a penalty.
- Termination of Employment: workers shall have the freedom to terminate employment of indefinite or long durations by means of notice of reasonable length (in accordance with national law or collective agreements – and as specified in their contract) at any time without penalty. Workers on contracts of fixed duration or fixed terms shall not be required to serve beyond the expiry of their contract. Employers shall not use means to restrict a worker's ability to terminate employment, for example by requiring deposits, withholding employee documentation, threats or use of violence, imposing financial penalties or requiring payment of recruitment fees.
- Threat of Violence, Harassment & Intimidation: employers shall not exact work or service from any person under the menace of penalty. This includes the use or threat of physical or sexual violence or harassment.

Coercion in Wage Payment, including Debt Bondage and Bonded Labour

- Wages shall be paid at regular intervals and methods of payment are prohibited that deprive workers of the genuine possibility of terminating employment. Wage payments shall not be delayed or deferred such that wage arrears accumulate.
- Wages shall be paid directly to the worker and should be paid in legal tender by BACs transfer. Payment in the form of vouchers, coupons or promissory notes is prohibited.
- Payments "in-kind" in the form of goods or services shall not be permitted.
- Workers that earn wages calculated on a performance-related or piece-rate basis shall not earn less than the legally mandated minimum wage.
- Workers shall not be held in debt bondage or forced to work for an employer in order to pay off an actually incurred or inherited debt.
- Deception in wage payment, wage advances, and loans to employees shall not be used as a means to bind workers to employment. Advances and loans, and deductions from wages made for their repayment, shall not exceed the limits prescribed by national law. Workers shall be duly informed of the terms and conditions surrounding the granting and repayment of advances and loans.
- No deductions from wages shall be made with the aim of indebting a worker and binding him or her to employment. Workers shall be informed of the conditions and extent of wage deductions, and only deductions authorised by national law, collective agreement or arbitration award shall be made.

Disciplinary Measures

- Disciplinary measures should not include sanctions that result in an obligation to work.
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- There shall be no deductions from wages for disciplinary purposes.

Compulsory Overtime

- Workers shall not be forced to work overtime above the limits permitted in national law and collective agreements under the menace of a penalty, for example the threat of dismissal.
- Work or service outside normal daily working hours shall not be imposed by exploiting a worker's vulnerability under the menace of a penalty. For example, employers shall not set performance targets that result in an obligation to work beyond normal working hours because of the worker's need to be able to earn the minimum wage.
- Freedom of Movement: coercion shall not be used to physically confine or imprison workers to the workplace or related premises, for example employer-operated accommodation. Mandatory residence in employer - operated accommodation shall not be made a condition of employment.
- Conditions relating to Skills Development & Vocational Training: training opportunities provided to employees shall be undertaken voluntarily. Employers that provide such opportunities shall not unreasonably impose work or service as a means of recovering the costs associated with them.

Human Trafficking & Forced Labour

Migration for Employment:

- Migrant workers, irrespective of their legal status, shall be treated fairly, and measures shall be taken to prevent abusive conditions and fraudulent practices that may lead to coercion and trafficking for labour exploitation.
- Migrant workers shall benefit from conditions of work no less favourable than those available to local workers, and shall have the right to enter into and terminate employment (with reasonable notice in accordance with national law or collective agreement) voluntarily and freely, without the threat of a penalty.
- Employers shall not threaten irregular migrant workers or their family members with denunciation to the authorities or otherwise coerce such workers into taking up or maintaining employment.
- No fee or cost for recruitment shall be charged directly or indirectly, in whole or in part, to the worker.

Document Retention:

- Practices such as confiscating or withholding workers' identity documents or other valuable items (e.g. work permits and travel documentation) are prohibited.
- Employers shall not retain personal documents for the purpose of binding workers to employment.

Contracts of Employment

- All workers shall be provided with written and understandable contracts of employment that clearly indicate their rights and responsibilities with regard to payment of wages, working hours, valid grounds for termination, and other issues related to preventing forced labour.

Equal Opportunities

The Company is an equal opportunities employer. This means that it is the Company's policy that there should be no discrimination against or harassment of any employee or job applicant either directly or indirectly on the grounds of:

- Race, colour, nationality or national or ethnic origin ("race");
- Sex or marital status;
- Disability (e.g., a long term mental or physical impairment);
- Sex change status;
- Sexual orientation;
- Religion or philosophical belief;
- Political belief;
- Trade union activity or
- Age

Full details are given in our Equal Opportunities Policy.

Freedom of association and the right to collective bargaining.

The Company respects freedom of association and the effective right to collective bargaining.

- Workers are free to establish or join worker organizations of their own choosing.
- The Company respects the full freedom of workers' organizations to draw up their constitutions and rules.
- The Company respects the rights of workers to engage in lawful activities related to forming, joining or assisting a workers' organization, or to refrain from doing the same, and will not discriminate or punish workers for exercising these rights. We will negotiate with lawfully established workers' organizations and/or duly selected representatives in good faith and with the best efforts to reach a collective bargaining agreement.