



# Ethical Trading Policy

## Business & Corporate Social Responsibility

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**Introduction**

The Company is committed to the policy of ethical trading by identifying and promoting good practice in the implementation of codes of labour practice. As a Company we promote the observance of internationally recognised labour standards, in particular fundamental human rights throughout global supply chains. The Company by committing to this policy wants to ensure that the working conditions of employees in companies that supply goods to consumers in the United Kingdom meet or exceed international standards. As a Company we abide by the standards that are contained in the Ethical Trading Initiative Base Code. By being a part of this initiative we aim to help to make substantial improvements to the lives of poor working people around the world.

The Ethical Trading Initiative covers the following provisions and is expanded below:

- a) Employment is freely chosen
- b) Freedom of association and the right to representation is respected
- c) Working conditions are safe and hygienic
- d) Child labour shall not be used
- e) Living wages are paid
- f) Working hours are not excessive
- g) No discrimination is practiced
- h) Regular employment is provided
- i) No harsh or inhumane treatment is allowed

The provision of this code constitute minimum and not maximum standards, therefore this code is not used to prevent this company from exceeding these standards. Where possible standards will be improved upon. This Company complies with national and other applicable law and where the provisions of law and this base code address the same subject, this company will apply that provision which affords the greater protection.

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### Employment is freely chosen

- a) There is no forced, bonded or involuntary prison labour
- b) Employees are not required to lodge “deposits” or their identity papers with the company and are free to leave the Company after reasonable notice.

### Freedom of association and the right to representation are respected

- a) All employees have the right to freedom of speech providing dignity and respect to others is shown at all times. There should be no breach of legislation relating to sex, race, disability, sexual orientation, religion or age.
- b) Employees’s representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- c) Employees have a forum for consultation within the business with elected representatives

### Working conditions are safe and hygienic

- a) A safe and hygienic working environment is provided. The Company has taken into consideration the prevailing knowledge of the food industry and its specific hazards. Adequate steps have been taken to prevent accidents and injury to health which may arise out of, be associated with, or occur during the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in our working environment.
- b) Employees receive regular and recorded health and safety training and this training is repeated for new or reassigned employees.
- c) Access to clean toilet facilities, water and where appropriate sanitary facilities for food storage is provided.
- d) The responsibility for health and safety has been assigned to the Managing Director and the Senior Management team.

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**9.4.5 Child labour shall not be used**

- a) There is no recruitment of child labour.
- b) The Company only recruits employees who are 16 years of age or over. Employment of 16 and 17 year olds will be subject to adherence to the Working time Directive and the additional duties imposed by Health and Safety legislation.
- c) Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- d) These policies and procedures conform to the provisions of the relevant International Labour Organisation (ILO) standards.

**Living wages are paid**

- a) Wages and benefits paid for a standard working week meet and in most cases exceed the national minimum wage.
- b) 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.
- c) Employees will be advised and agree to any deductions made from wages.

**Working hours are not excessive**

- a) Working hours comply with the Working Time Regulations.
- b) Employees shall not on a regular basis be required to work an average of 48 hours per week (over 17 weeks) and shall be provided with at least one day off for every 7 day period on average. Overtime shall always be compensated at the appropriate rate.
- c) Any employee who wishes to may voluntarily sign an opt out agreement of the Working Time Regulations 1998.

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**9.4.8 No discrimination is practised**

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.

**Regular employment is provided**

- a) All employee shall be provided with details of their standard hours of work in their statement of terms and conditions of employment.
- b) Because of the nature of the food industry, hours can be variable. However, employees shall be given reasonable notice of any change in hours.

**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 is prohibited.

**Involvement with suppliers**

The Company will, wherever possible, ensure that our suppliers adopt the standards that are contained in the Ethical Trading Initiative Base Code. We will commit to help our suppliers draw up such documents making sure that they too are committed to the policy of ethical trading by identifying and promoting good practice in the implementation of codes of labour practice.

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