

WADE SPRING LTD

Ethical Trading Policy

Summary Statement

Wade Spring Ltd is committed to implementing the principles of the Ethical Trading Initiative base Code (although we are not members of the ETI). Wade Spring Ltd endeavours to trade according to the following Ethical Trading Criteria:

- All employment is freely chosen.
- Freedom of association and the right to collective bargaining are respected.
- Working conditions are safe and hygienic.
- Child labour shall not be used.
- Living wages are paid.
- Working hours are not excessive.
- No discrimination is practised.
- Regular employment is provided for those who are employed on a permanent contract.
- No harsh or inhumane treatment is allowed.
- No bribery, corruption, blackmailing or bullying is permitted.
- Suppliers and buyers are free to sell and buy from any number of businesses. No restrictions to guarantee business, is allowed.

Wade Spring Ltd full Ethical Trading Policy can be read below:

1. EMPLOYMENT IS FREELY CHOSEN

- 1.1. There is no forced, bonded or involuntary labour used.
- 1.2. Staff are not required to lodge deposits or identity papers with Wade Spring Ltd.
- 1.3. Staff are free to leave Wade Spring Ltd after reasonable notice.

2. FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING ARE RESPECTED

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

- 2.2. Wade Spring Ltd operates an open attitude towards the activities of trade unions and their organisational activities.
- 2.3. Staff representatives are not discriminated against and have access to carry out their respective functions in the workplace.

3. WORKING CONDITIONS ARE SAFE AND HYGIENIC

- 3.1. A safe and hygienic working environment shall be provided. 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.
- 3.2. Health and Safety training is provided regularly and is recorded against such staff. The training is repeated for new staff members and or reassigned staff.
- 3.3. Access to clean toilet facilities and the provision of potable water, and sanitary facilities for food storage is also provided.
- 3.4. Health and Safety responsibility has been assigned to a senior management representative.

4. ENVIRONMENT REQUIREMENT

- 4.1. Wade Spring Ltd wishes to share its commitment to the environment with suppliers whose practises conform to applicable environmental standards.

5. CHILD LABOUR SHALL NOT BE USED

- 5.1. There shall be no recruitment of child labour.
- 5.2. Children or persons under 16 are not employed at any time, day or night.

6. LIVING WAGES ARE PAID AND WORKING HOURS

- 6.1. Staff wages and benefits paid for a standard working week meet, at a minimum, national legal standards.
- 6.2. All staff are provided with written terms and conditions of employment that details the employment relationship between, and the respective obligations of, the employee and employer, rates of pay, working hours, grievance and disciplinary procedures, holiday entitlement, absence and sick pay rules and notice periods for termination of employment.

- 6.3. Staff are not forced to work in excess of 48 hours per week, a voluntary opt-out agreement is available for those wishing to work in excess of 48 hours per week.
- 6.4. Overtime is on a voluntary basis and shall not be demanded on a regular basis.
- 6.5. No deductions are made from wages as a disciplinary measure, and pay slips detailing lawful deductions are provided for each pay 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, nationality, religion, age, disability, marital status, sexual orientation, union membership or political affiliation.
- 7.2. Opportunities for personal and career development are equally available to all employees.

8. REGULAR EMPLOYMENT IS PROVIDED

- 8.1. Regular employment is provided for those who are on a permanent contract.
- 8.2. Labour-only contracting, sub-contracting and fixed term contracts are not used as a means to avoid obligations under labour and social security laws.

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 or other forms of intimidation shall be prohibited and grounds for summary dismissal, if proved.

10. NO BRIBERY OR CORRUPTION WILL BE TOLERATED

- 10.1. The offering, paying, soliciting, or accepting of bribes or kick-backs, including facilitation payments, is strictly prohibited. A bribe may involve giving or offering any form of gift, consideration, reward or advantage to someone in business or government in order to obtain or retain a commercial advantage or to induce or reward the recipient for acting improperly or where it would be improper for the recipient to accept the benefit. Bribery can also take place where the offer or giving

of a bribe is made through third party, e.g. An agent, representative or intermediary.

- 10.2. If bribery or corruption is proven, then this grounds for summary dismissal.

11.LEGAL REQUIREMENTS

- 11.1. Wade Spring Ltd are committed to full compliance with the laws and regulations in each procurement location where Wade Spring Ltd conducts business, and will not knowingly operate in violation of any such law or regulation.
- 11.2. Wade Spring Ltd will not knowingly use suppliers who violate applicable laws and regulations.