ETHICAL TRADING POLICY

Our company has recognised its obligations under ethical trading for many years, but seeks hereby to formalise the ethos of the company with regard to this subject.

It shall be the policy of the company to recognise its position and to act as an upright and honourable member of society, to be compliant with its legal obligations in this area, and to have regard to the fair rights of individuals to make a living wage. The company shall also be cognisant of the necessity for it to recognise these obligations in the context of its "global" economy.

The company recognises its obligations under ethical trading to encompass its ***employment practices*** and its ***trading activities***.

1. Employment Practices:

Specific items include:

Freedom Of Choice:
The company shall employ only those personnel who work with the company out of their own free choice. This means that the company specifically excludes the use of forced or bonded or involuntary prison labour.

Workers shall not be required to lodge deposits or their identity papers or any other surety with the company (other than medical licence where required), and all employees shall be free to leave the employ of the company after notice as stipulated under legal regulations or according to their contract of employment.

Right To Associate And Collective Bargaining:
Within the prevailing legislative framework, workers shall have the right to join or form trade unions of their choosing and to bargain collectively.
The company shall adopt an open attitude towards representatives of trade unions and their organisational activities.
Workers representatives shall not be discriminated against, and shall have access to carry out their representative functions in the workplace in so far as their activities do not impede the efficient running of the company production.
Where the right to freedom of association and collective bargaining are restricted under the law, the company shall not hinder the development of parallel means for independent and free association and bargaining.

Working Conditions
A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry of specific hazards. Adequate steps shall be taken to prevent accidents and injury arising out of and associated with, or occurring in the course of work, by minimising, so far as is reasonably practical, the causes of hazards inherent in the working environment.
In this regard workers shall receive regular and recorded health & safety training. This training shall be repeated for new or re-assigned workers.

Access to clean toilet facilities and to potable water and if appropriate sanitary facilities for food storage shall be provided.
Responsibility for health and safety shall be assigned to a senior manager.

Child Labour
The company policies and procedures in this regard shall have regard to the provisions of ILO standards.
There shall be no recruitment of child labour of any kind (less than 16 years).
Young persons (16 to 18 years) shall not be employed at night or in hazardous conditions.
The company shall hold as a basic requirement that none of its suppliers shall participate in this practice.

Wage Rates:
The company shall pay wages and benefits for a standard working week at a minimum the national legal standards or industry benchmark standards, which ever is higher.
All employees shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment.
All employees shall be provided with written and understandable information about the particular of their wages for the pay period concerned each time they are paid.
Deductions required by national law shall be made, deductions not required by national law shall only be made with the written permission of the worker concerned.

Disciplinary Procedures:
All disciplinary measures shall be carried out in accordance with company procedures. All disciplinary measures shall be recorded.
No deductions from wages shall be made as a disciplinary measure.

Working Hours:
Working hours shall comply with the National laws or benchmark standards (where relevant), whichever affords the best protection.
In any event, workers shall not be required to work in excess of 45 hours per week. Overtime shall be voluntary, and shall not be demanded on a regular basis, and shall always be compensated at a premium rate.

Discrimination
There shall be 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.

Maternity rights shall be upheld in accordance with current national legislation.

Employee Rights
To every extent possible work performed shall be on the basis of a recognised employment relationship established through national law and practice.

The company recognises obligations to employees under labour and social security laws and regulations arising from regular employment relationship shall not be avoided through the excessive use of fixed term contracts of employment. Employees' rights derived from their religion can also be exercised during their

work, as long as this is not interfering the working process as also holidays related to employees religion, are respected

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

Adherence to The Above Policies
All employees shall be issued with contracts of employment detailing the rights and privileges of employees and the obligations of both the employer and the employee in accordance with national and EU regulations.

2. Trading Practices

It shall be the policy of the company to preferentially seek out trading partners who also meet with similar responsible employment practices to those espoused by the company.

The company shall make reasonable efforts to verify that its suppliers also enact similar policies of employment. Where such companies do not engage in these practices, then the company shall actively seek alternative suppliers.