



Ethical Trading Policy

Reference:	CHA-HR-POL-0004	Issue No.:	2026-2	Date of Issue	29/09/2026
Revised By:	Tara Pullen	Authorised By:	Claire Owens	Page 1 of 4	

ETHICAL TRADING POLICY

The Company is committed to respecting internationally recognised labour standards and the principles of the Ethical Trading Initiative (ETI) Base Code.

We expect the Company, our suppliers and our subcontractors to comply with this policy and with all applicable UK and local laws. Where this policy provides a higher standard than the law, the higher standard should be applied where reasonably practicable.

1. EMPLOYMENT IS FREELY CHOSEN

- No forced, bonded, trafficked or involuntary labour is permitted.
- Workers must not be required to surrender identity documents or pay deposits to obtain or retain employment.
- Workers must be free to leave their employment in accordance with their contractual notice requirements.

2. WORKING CONDITIONS ARE SAFE AND HYGIENIC

- A safe and hygienic working environment must be provided.
- Appropriate measures must be taken to prevent accidents and work-related injury or ill health.
- Workers must have access to clean toilet facilities and drinking water.
- Where accommodation is provided, it must be clean, safe and suitable.
- Responsibility for health and safety must be assigned to an appropriate person within the organisation.

3. CHILD LABOUR IS NOT PERMITTED

- Child labour must not be used.
- Suppliers must comply with applicable minimum age requirements.
- Workers under 18 must not undertake work that is hazardous or otherwise prohibited by law.
- Where child labour is identified, appropriate steps must be taken to protect the child and support their transition into education or other appropriate arrangements.

4. WAGES AND BENEFITS

- Workers must receive at least the applicable legal minimum wage and any legally required benefits.
- Workers must receive clear information about their pay and employment conditions.
- Unlawful deductions from wages are not permitted.
- Deductions as a disciplinary measure are not permitted.
- Any disciplinary action must be fair, lawful and appropriately recorded.

The Company expects suppliers to meet applicable legal wage requirements and, where appropriate, relevant industry standards.

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5. WORKING HOURS

- Working hours must comply with applicable law and the ETI Base Code, whichever provides greater protection.
- Normal working hours should not exceed 48 hours per week, excluding overtime.
- Overtime should be voluntary, used responsibly and not used to replace regular employment.
- Workers should normally receive at least one day off in every seven-day period, or two days off in every 14-day period where permitted by law.
- Total working hours should not normally exceed 60 hours in any seven-day period, except where the limited exceptions under the ETI Base Code and applicable law apply.
- Overtime should be appropriately compensated in accordance with applicable law, contractual arrangements and the ETI Base Code.

6. NO DISCRIMINATION

There must be no unlawful discrimination in recruitment, pay, training, promotion, working conditions, disciplinary action, dismissal or any other aspect of employment.

This includes discrimination relating to:

- age;
- disability;
- gender reassignment;
- marriage or civil partnership;
- pregnancy or maternity;
- race;
- religion or belief;
- sex; or
- sexual orientation.

Workers must also not be disadvantaged because of trade union membership or lawful trade union activities.

7. REGULAR EMPLOYMENT

- Wherever possible, work should be carried out under a recognised employment relationship in accordance with applicable law.
- Suppliers must not use labour-only contracting, subcontracting, temporary arrangements or other practices to avoid legal or contractual obligations to workers.
- Employment arrangements must not be structured solely to avoid workers' legal rights or benefits.

8. NO HARSH OR INHUMANE TREATMENT

- Physical abuse, threats, intimidation and corporal punishment are prohibited.
- Bullying, harassment and verbal abuse are not permitted.
- Sexual harassment and other forms of unlawful harassment are prohibited.
- Workers must be treated with dignity and respect.

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9. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

- Workers have the right, where permitted by law, to join or form trade unions of their choice and to participate in collective bargaining.
- Workers must not be discriminated against because of trade union membership or lawful trade union activities.
- The Company will maintain an open and constructive approach to recognised trade unions and worker representatives.
- Where freedom of association is restricted by law, the Company will support appropriate alternative means of worker representation and communication.

10. SUPPLIERS AND SUBCONTRACTORS

The Company expects suppliers and subcontractors to:

- comply with this policy and applicable law;
- communicate these standards to their employees and subcontractors;
- maintain appropriate records and evidence of compliance; and
- cooperate with reasonable requests for information, audits or assessments relating to these standards.

Where a supplier or subcontractor is found not to meet these requirements, The Company will work with them, where appropriate, to identify and address the issue.

This policy sets minimum standards and does not limit any additional rights or protections provided by law, contract or collective agreement.



C Owens
Group CEO
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