

## ETHICAL TRADING POLICY

### POLICY STATEMENT

Kamac Limited recognises the responsibility that they share with their suppliers to operate ethically. In pursuit of this, we require that all our suppliers comply with our Ethical Trading Policy.

We expect all our suppliers to have ethical processes and policies in place throughout their supply chain and to comply to the standards as outlined in this policy. We will monitor supplier compliance with this policy through pre-qualifying questionnaires and other methods including the requirement for suppliers to provide reasonable information as evidence of compliance to with our Ethical Trading Policy.

### Coverage

This policy applies to Kamac and all its' supply chains.

### Responsibility

The Managing Director has overall responsibility for this policy.

### Policy Commitments

Suppliers to Kamac shall commit to ensure that:

#### 1. Employment is freely chosen

1.1 There is no forced, bonded or involuntary prison labour.

1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

#### 2. Working conditions are safe and hygienic

2.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. 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.

2.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

2.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

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2.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

2.5 The company observing the code shall assign responsibility for health and safety to a senior management representative.

2.6 Appropriate safeguards are taken to protect the workers' health and safety, including the provision of appropriate PPE and training where required.

### **3. Child labour shall not be used**

3.1 There shall be no new recruitment of child labour.

3.2 Children and young persons under 18 shall not be employed at night or in hazardous conditions.

### **4. Living wages are paid**

4.1 Wages and benefits paid meet, at a minimum, national legal standards.

4.2 All workers 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.

4.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law or their contract of employment, be permitted without the expressed permission of the worker concerned.

### **5. Working hours are not excessive**

5.1 Working hours and rest periods must comply with national laws and if applicable collective agreements.

5.2 Working hours, excluding overtime, shall be defined by contract.

5.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Where overtime is worked it shall always be pre-approved and compensated.

### **6. No discrimination is practised**

6.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on age; race (which includes colour and ethnic/national origin); disability; religion or belief; sex; gender reassignment; pregnancy or maternity; sexual orientation; and marital or civil partnership status.

### **7. Regular employment is provided**

7.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

7.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular

employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

### **8. Freedom of association and the right to collective bargaining are respected**

8.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

8.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.

8.3 Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.

8.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

### **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 abuse or other forms of intimidation shall be prohibited.

A handwritten signature in black ink, appearing to read 'Paul Kamel'.

Signature:

Title: Paul Kamel, Managing Director

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