

## **Ethical Trade Policy**

Extraman recognises the responsibility that they share with their clients and suppliers to operate ethically.

Promoting decent working conditions in our supply chains is part of our strategy to act in a social responsible manner. In pursuit of our aims, we require that all our clients and suppliers comply with our Ethical Trading Policy, which is based on the Fundamental Conventions of the International Labour Organisation (ILO) and national and international laws.

We expect all our clients and suppliers to have ethical processes and policies in place throughout their supply chain. We will monitor compliance with this policy through initial assessment and ongoing due diligence, including the requirements for suppliers to provide reasonable information as evidence of compliance to with our Ethical Trading Policy.

### **Coverage**

This policy applies to all services provided by the Company

### **Policy Commitments**

Extraman will only work with clients and suppliers who 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. Freedom of association and the right to collective bargaining are respected**

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

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

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

#### **3. Working conditions are safe and hygienic**

3.1 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.

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

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

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

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

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

4.1 There shall be no child labour.

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

#### **5. Living wages are paid**

5.1 Wages and benefits paid for a standard working week meet, at a minimum, the national legal minimum wage and should always be enough to meet basic needs and to provide some discretionary income.

5.2 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.

5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

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

6.1 Working hours must comply with the Working Time Directive, any collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.

6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.

6.3 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.

6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.

6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where all of the following are met:

- This is allowed by national law
- This is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce
- Appropriate safeguards are taken to protect the workers' health and safety; and
- The client can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies

6.6 Workers shall be provided with at least one day off in every 7 day period or, 2 days off in every 14 day 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, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

**8. Regular employment is provided**

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

8.2 Obligations to workers 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.

**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.

**ACCOUNTABILITY, DOCUMENT AND VERSION CONTROL**

This document is effective from:	15/11/22
This document is approved by:	Kim Trees – Operations Director
For questions or queries about this document, contact:	Kim Trees – Operations Director / Gary Waller – Operations Director

The following table details any updates, changes or developments made to this document:

<b>Version</b>	<b>Details</b>	<b>Date</b>	<b>Approved by</b>
1.	Version 1 – Original Policy	15/11/22	Kim Trees
2.	Version 2 – revised	17/12/2023	Kim Trees