



## **ETHICAL TRADING POLICY**

All AFE Group businesses are required to comply with the following Ethical Trading Policy, to encourage compliance with it by their suppliers and to monitor such compliance so far as reasonably practicable.

1. Employment is freely chosen
  - 1.1. No one shall be held in slavery or servitude. There is no use of forced or compulsory labour. (as outlined in the UK Modern Slavery Act 2015)
  - 1.2. There is no human trafficking for the purposes of exploitation, which includes securing services by force, threat or deception, or securing services from children and vulnerable persons (as outlined in the UK Modern Slavery Act 2015)
  - 1.3. Workers are free to leave their employer after reasonable notice.
2. Freedom of association and the right to collective bargaining are respected to the extent permitted by local law.

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.

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 minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
  - 3.2 Workers shall receive appropriate health and safety training, and such training shall be repeated for new or reassigned workers.
  - 3.3 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
  - 3.4 The company observing the policy shall assign responsibility for health and safety to a senior management representative.
4. Child labor shall not be used
  - 4.1 There shall be no use of child labor which shall be exploitative or shall jeopardize the health, safety, educational development or morals of any child.
  - 4.2 Children and young persons under 18 shall not be employed at night or in hazardous conditions.
  - 4.3 Policies and procedures shall conform to the provisions of the relevant ILO standards.

5. Living wages are paid
  - 5.1 Wages and benefits paid for a standard working week meet national legal standards.
  - 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 for the worker concerned. All disciplinary measures should be recorded.
6. Working hours are not excessive.  
Working hours comply with national laws and known benchmark industry standards.
7. No discrimination is practiced.  
  
There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, disability, gender, marital status, sexual orientation, union membership or political affiliation.
8. No harsh or inhumane treatment is allowed  
Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited
9. No bribery or corruption is permitted  
No bribes shall be paid or accepted to give or receive business.
10. Follow good environmental practice  
To meet all relevant national and international environmental laws and regulations and to continuously improve environmental performance.

If you wish to contact the **Group Managing Director** regarding our Core Principles, you can write to the registered office address, 35 Bryggen Road, North Lynn Industrial Estate, Kings Lynn, Norfolk, PE30 2HZ. Alternatively, he can be contacted by e-mail at [info@theafegroup.com](mailto:info@theafegroup.com) or by telephone on +44 (0) 1553 817 554.

**Chief Executive Officer**  
**AFE Group Ltd**