



NOTE: This is a CONTROLLED Document.

Policies are reviewed annually and in line with any regulatory requirements, changes in law or business amendments. Please note that the online version is the only version that is maintained. Any printed copies should, therefore, be viewed as 'uncontrolled' and as such, may not necessarily contain the latest updates and amendments.

Summary Statement

- 1.1 At Avensys UK Ltd. we strongly believe in ethical principles and good stewardship. Where possible we trade according to the following Ethical Trading Criteria:
- All employment is freely chosen
 - Working conditions are safe and hygienic
 - Child labour is not used
 - Wages are fair and comparable to industry standard.
 - Working hours are not excessive
 - No discrimination is practised
 - Regular employment is provided for those who are employed on a permanent contract.
 - No harsh, cruel, or degrading treatment or practices are allowed
 - No bribery, corruption, blackmailing, or bullying is permitted
 - Third party suppliers and buyers are both free to sell and buy from any number of other businesses. No restrictions, as a way of guaranteeing business are allowed.

Our Full Ethical Trade Policy Statement

- 2.1 Avensys UK Ltd. recognises that our commercial activities have potential to impact on our suppliers and our locality.

As a socially responsible small business our suppliers, local community and customers have the right to expect:

- Products sourced by Avensys UK Ltd. are produced under working conditions that are hygienic and safe.
- All workers involved in the delivery of services provided by Avensys UK Ltd. are treated with full consideration to their basic human rights.
- Avensys UK Ltd. acts in an ethical manner above and beyond basic legal requirements.

- 2.2 Avensys UK Ltd. is therefore committed to implementing the principles of the Ethical Trading Initiative (although we are not members of the ETI)

These require companies to:

- demonstrate a clear commitment to ethical trade
- integrate ethical trade into their core business practices
- drive year-on-year improvements to working conditions
- support suppliers to improve working conditions, for example through advice and training
- report openly and accurately about their activities

- 2.3 Avensys UK Ltd. Is ethically committed to its suppliers, service providers and customers and recognises that our ethical and social performance and reputation is a key part of our overall commercial success.

- 2.4 Avensys UK Ltd. fully supports the Modern Slavery Act, 2015 which provides law enforcement with the tools to fight modern slavery, ensures perpetrators can receive suitably severe punishments for these appalling crimes and enhances support and protection for victims. Avensys UK Ltd. does not, to date, have to publish a Section 54 statement as it does not meet the current Company size requiring such reporting.

Employees

- 3.1 Avensys UK Ltd. is committed to ensuring that our employment practices and the enforcement of corporate regulations ensure the protection of the rights of all those who work for us. In many areas, we aim to operate above the minimum standards required by law to ensure our employees are safe, rewarded and valued. As we of course expand and become larger we will be able to offer more opportunities for our employees. We establish recognised relationships with our employees in accordance with existing legislation in UK or in any Country where we are obtaining products or sub-contracting. All employees are provided with an easy to read, formal contract of employment with particular clarity in relation to wages. In the case where an employee is unable to read, the contract of employment will be read and explained to them by a union representative or another appropriate third party.

Customers

- 4.1 Avensys UK Ltd is committed to demonstrating its ethical and social responsibility credentials to enable customers to make informed choices about whose services they purchase.

Suppliers

- 5.1 Avensys UK Ltd. is committed to monitoring social standards in our supply chain and we encourage our suppliers to operate the same ethical standards we employ ourselves.

Avensys UK Ltd. Ethical Trading Code of Practice

- 6.1 This code of practice applies to:
- Employees directly employed by Avensys UK Ltd. on temporary or permanent contracts.
 - Employees employed or provided by contractors or employment agencies to work on Avensys UK Ltd.'s premises or to undertake work on behalf of Avensys UK Ltd.
- 6.2 No forced, bonded, or involuntary labour shall be used.
- All employment with Avensys UK Ltd. is freely chosen
 - Employees are not required to lodge deposits or identity papers with us
 - Employees are free to leave Avensys UK Ltd. after serving reasonable notice as set out in their contract of employment.
- 6.3 Child Labour
- In principle Avensys UK Ltd. is against the use of child labour and believes its long-term elimination is ultimately in the best interests of children. However, the elimination of child labour must always be undertaken in a manner consistent with the best interests of the children concerned.

- Procurement and supply management professionals will ensure that their organisation's supplier comply with the following: in this context "child" refers to any persons less than 15 years of age, unless local legislation on the minimum age stipulates a higher age for work or mandatory schooling in which case the higher age shall apply
- Young person refers to any worker over the age of a child, as defined above, under the age of 18.
- We will develop or participate in and contribute to a policies and programmes which provide for the transition of any exiting worker found to be a child performing child labour to enable her or him to attend and remain in quality education until no longer a child
- Avensys UK Ltd. will not employ children or young persons under 18 in hazardous conditions.
- In any event the course of action taken shall be in the best interest of the child, conform to the provisions of ILO C138 Minimum Age Convention (1973) and be consistent with the United Nation's Convention of the Rights of the Child.

6.4 Working conditions are safe and hygienic

- The H&S officer is assigned responsibility for Health and Safety within the Company.
- Avensys UK Ltd. takes adequate measures to prevent accidents and minimise potential hazards
- Employees receive regular health and safety training and have access to the Health and Safety Policy
- The H&S Officer regularly monitors compliance with the Health and Safety Policy.
- Appropriate PPE is provided to all employees who require them at no cost to the individual.
- Employees have unrestricted access to welfare, toilet facilities and drinking water and are entitled to regular breaks.
- Avensys UK Ltd. has a published Health & Safety Policy.

6.5 Working hours and remuneration are reasonable and comparable to other companies in our sector and regular employment is provided.

- Employees are not forced to work in excess of 48 hours per week
- Employees are provided 2 days off per week
- Employees are given written terms and conditions of employment that details the employment relationship between and the respective obligations of the employee and the employer, rates of pay, working hours, grievance and disciplinary procedures, holiday entitlement, absence and sick pay rules and notice periods for termination of employment.
- Pay slips detailing lawful deductions are provided for each pay period.
- Labour only, contracting, sub-contracting and fixed term contracts are not used as a means to avoid obligations under labour or social security laws.

6.6 No discrimination is practised:

- There is no discrimination in pay, hiring, compensation, access to training, promotion and termination of employment or retirement on the grounds of race, nationality, religion, age, disability, marital status, sexual orientation, union membership or political affiliation.
- Opportunities for personal and career development are equally available to all employees.
- No harassment, threats, abuse, or intimidation shall be practised. Physical, verbal, and sexual threats, abuse, harassment, or intimidation is expressly prohibited and grounds for summary dismissal, if proved.

6.7 Employment Agencies

Employment agencies contracted to supply temporary employees shall demonstrate commitment to and application of the requirements of this code.

Employment agencies contracted to supply temporary employees shall ensure that all employees supplied to Avensys UK Ltd. are eligible to work in the UK by:

- Following UK Visas and Immigration guidelines
- Ensuring that the requirements of the Immigration and Asylum Act 1999 Section 22 Code of Practice are met.
- Retaining copies of identity papers, work permits, or passport stamps as detailed in the Home Office List of Specified Documents and UK Passport Stamps.

6.8 Employment agencies contracted to supply temporary employees shall ensure that all employees supplied to Avensys UK Ltd. have sufficient command of English to understand:

- The agency's responsibilities under this code of practice
- Avensys UK Ltd. health and safety requirements
- Written statements of employment particulars
- Or have other measures in place to ensure that all these requirements are communicated in the employee's native language.

6.9 Organisation

Avensys UK Limited Chief Executive Officer (CEO) has overall responsibility for all aspects of ethical trading at work within the business.

6.10 Looking towards further improvement

Avensys UK Ltd. is always looking to develop and learn from others and welcome anyone that has any suggestions or feedback regarding our policy or practice to contact us.

Endorsed by the CEO
Signed: CEO

Robert Strange