

Corporate Policy

Ethical Trading Policy

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Distribution

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1. Policy Statement

Tenpin recognises the responsibility that they share with their suppliers to operate in an ethical manner. In order to achieve this, we require that all of our suppliers comply with our Ethical Trading Policy, which is based on the Fundamental Conventions of the International Labour Organisation (ILO) and applying the principles of the Ethical Trading Initiative (E.T.I).

The provisions within this Policy constitute minimum and not maximum standards and should not be used to prevent suppliers from exceeding these standards. In applying the provisions of this Policy, suppliers are expected to comply with national and other applicable law and, where the provisions of law and this Policy address the same subject, suppliers should apply that provision which affords the greater protection for their workers.

Tenpin will, as far as is reasonably practicable, ensure that they, and their suppliers and their sub-contractors, comply with the stated policy requirements. However, it is the suppliers' responsibility to implement this code and due diligence processes further down its own direct supply chains.

2. Policy Requirements

Suppliers to Tenpin shall commit to ensure that:

A. Employment is freely chosen

- I. There is no forced, bonded or involuntary prison labour.
- II. Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

B. Freedom of association and the right to collective bargaining are respected

- I. Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- II. The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
- III. Worker's representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- IV. 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 of bargaining.
- V. Working conditions are safe and hygienic

C. A safe and hygienic working environment shall be provided.

- I. 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.
- II. Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- III. Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- IV. Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

D. Child labour shall not be used

- I. There shall be no recruitment of child labour.
- II. Companies shall develop or participate in programmes which provide for the transition of any child found to be performing child labour to enable that child to attend and remain in quality education until no longer a child.
- III. Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- IV. These policies and procedures shall conform to the provisions of the relevant ILO standards.

E. Living wages are paid

- I. Wages and benefits paid for a standard working week meet, at a minimum, national legal standards. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- II. 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.

F. Working hours are not excessive

- I. Working hours must comply with national laws, collective agreements, and the provisions of F) V.a to F)V. e below, whichever affords the greater protection for workers. Points F) V.a to F)V. e are based on international labour standards.
- II. Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week¹
- III. 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.
- IV. The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by points below.
- V. Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where all of the following are met:
 - a. this is allowed by national law;
 - b. this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
 - c. appropriate safeguards are taken to protect the workers' health and safety; and
 - d. the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
- e. Workers shall be provided with at least one day off in every 7 day period or,

¹ *International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced

where allowed by national law, 2 days off in every 14 day period²

G. No discrimination is practiced

There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on disability, race, caste, national origin, religion, age, gender, marital status, sexual orientation, union membership, political affiliation or other protected characteristics, as defined by the Equality Act 2010.

H. Regular employment is provided

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

I. 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.

J. Relevant taxes are paid

All relevant taxes will be paid whether under UK law or under the law of any foreign country. The business will be conducted in a manner such that the opportunity for, and incidence of, tax evasion is prevented.

3. Actions

Tenpin will ensure that this policy is communicated and available to all relevant stakeholders as appropriate.

This policy shall be reviewed for effectiveness and suitability at least annually as part of the management review process.

² *International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced