



SPARTANS

LIMITED

ETHICAL TRADING POLICY

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Address: Unit 33, Broadfield Lane

Boston, PE21 8DR

Tel: 07724025516

Email: info@300spartans.uk

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Ethical Trading Policy

ETHICAL TRADING CRITERIA

At 300 Spartans Limited we believe strongly in ethical principles and good stewardship. We are therefore proud to guarantee that we trade according to the following Ethical Trading Criteria:

- All work and worker engagements are freely chosen;
- Working conditions are safe and hygienic;
- Child labour is not used;
- Wages are fair and comparable to industry standard;
- Deductions from wages as a disciplinary measure shall not be permitted;
- Working hours are not excessive;
- No discrimination is practiced;
- Regular work is provided for those who are engaged by the Company;
- No harsh, cruel or degrading treatment or practices are allowed;
- No bribery, corruption, blackmailing or bullying is permitted; and
- 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.

WORKERS

300 Spartans Limited is committed to ensuring that our work 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 workers are safe, rewarded and valued. As we expand we will be able to offer more opportunities for our workers.

CUSTOMERS

300 Spartans Limited is committed to demonstrating its ethical and social responsibility credentials to enable customers to make informed choices about whose services they purchase.

300 SPARTANS LIMITED ETHICAL TRADING CODE OF PRACTICE

1. ***Work is freely chosen:***

- There is no forced, bonded or involuntary prison labour; and
- Workers are not required to lodge "deposits" or their identity papers with the Company and are free to leave the Company after reasonable notice. Only photocopies of passports and Birth Certificates are kept as proof of entitlement to work in the UK.
- No loans of money or anything else are made to workers.

- Workers are provided with detailed written terms and conditions of work, which they are free to accept.

2. *Freedom of association and the right to collective bargaining are respected:*

- Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively;
- The Company adopts an open attitude towards the activities of trade unions and their organisational activities;
- Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace; and
- Workers are entitled to join the Company's Health and Safety Committee and contribute their opinions to the management of the business.

3. *Working conditions are safe and hygienic:*

- 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;

- Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers;
- Access to clean toilet facilities, potable water and sanitary facilities for food storage shall be provided; and
- The Company observing the code shall assign responsibility for health and safety to a senior management representative.
- The Company has its own Health and Safety Committee which is open to all members of staff and workers to join.
- No living accommodation is provided to workers.

4. *Child labour shall not be used:*

- There shall be no recruitment of child labour; and
- Children or persons under 18 are not engaged at any time, day or night.

5. *Working hours and remuneration:*

- Working hours and remuneration are reasonable and comparable to other companies in our sector and regular work is provided;
- Workers pay rates are at or above the national legal minimum standards;
- Workers are not forced to work in excess of 48 hours per week;
- Workers are provided 2 days off in fourteen;
- Workers who wish to work in excess of an average 48 hours per week have willingly signed a collective Opt Out Agreement to enable them to do so.

- No worker exceeds 60 hours work per week.
- Overtime is non-compulsory and paid at a premium rate.
- Workers are given written terms and conditions that detail the working relationship between and the respective obligations of the worker and agency, rates of pay, working hours, grievance and disciplinary procedures, holiday entitlement, absence and sick pay rules and notice periods for termination of contract; and
- No deductions are made from wages as a disciplinary measure, and pay slips used as a means to avoid obligations under labour or social security laws.

6. *No discrimination is practised:*

- There is no discrimination in pay, hiring, compensation, access to training, promotion, and termination of contract on the grounds of race, nationality, religion, age, disability, marital status, sexual orientation, union membership or political affiliation; and
- Opportunities for personal career development are equally available to all workers.
- The Company has a detailed Equal Opportunities and Anti Harassment Policy and Procedure

7. *Regular work is provided:*

- All workers are provided with detailed terms and conditions of work which offer them a permanent engagement with the Company
- To every extent possible work performed must be on the basis of recognised terms and conditions established through national law and practice; and

8. *No harassment:*

- No threats, abuse or intimidation shall be practiced; and
- Physical, verbal and sexual threats, abuse, harassment or intimidation is expressly prohibited and ground for summary dismissal, of proved cases.
- Workers are provided with details of the Company's Formal and Informal Grievance procedures, to enable them to report and unwanted conduct or harassment.
- The Company's formal disciplinary procedure lists any act of harassment as potential Gross Misconduct and can lead to dismissal.

9. *Organisation:*

- 300 Spartans Limited Director have overall responsibility for all aspects of ethical trading at work within the business.