

Ethical Trading Policy 2025

The principles adopted by Drakemoor Limited in this policy document are based on the International accepted standards set out in the Ethical Trading Initiative (ETI) Base Code of Labour Standards.

Drakemoor Limited will, as far as is reasonably practicable, ensure that they, and their suppliers and their sub-contractors, comply with the stated policy requirements.

1. Employment is freely chosen

- There shall be no forced, bonded or involuntary prison labour. Workers will not be required to leave deposits or their identity papers with us and will be free to leave after reasonable notice.

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

- An open attitude shall be adopted towards activities of trade unions and workers have the right to join or form trade unions of their own choosing. Collective bargaining is respected and worker's representatives are allowed to carry out their representative function in the workplace.

3. Modern slavery and human trafficking is not tolerated

- We will take the necessary steps to ensure slavery and human trafficking is not taking place in our supply chain, labour force or any part of our business.
- We oppose and will not tolerate or condone any form of practice that constitutes slavery or human trafficking whatsoever and to this end we shall carry out due diligence and auditing and put in place safe reporting mechanisms.

4. Working conditions are safe and hygienic

- A safe and hygienic working environment shall be provided. 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 if appropriate sanitary facilities for food storage shall be provided.

5. Child labour shall not be used

- There shall be no recruitment of child labour.

6. Living wages are paid

- Wages and benefits paid for a standard working week shall meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher.

- All workers shall be provided with written and understandable information about their employment conditions with 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.

7. Working hours are not excessive

- Working hours shall comply with National Laws and Benchmark Industry Standards, whichever affords greater protection. They shall also meet Local, National, Legal or Industry Benchmark standards as a minimum.

8. No discrimination is practised

- There shall be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race (including colour, nationality or ethnic origin), religion, belief, age, disability, gender, gender reassignment, marital status, sexual orientation, or political affiliation.

9. Employment

- Physical abuse or discipline, the threat of physical abuse, sexual or other harassment, verbal abuse or other forms of intimidation shall be prohibited.

10. No harsh or inhumane treatment is allowed

- To every extent possible, work performed shall be based on a recognised employment relationship established through national law and practice.

11. 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.
- We will ensure that this policy is communicated and available to all relevant stakeholders as appropriate.

This policy will be made available to all employees in our Employee Handbook. It will also be displayed on our Company website. This policy shall be reviewed for effectiveness and suitability at least annually as part of the management review process.

Spenser Mills
Managing Director
Drakemoor Limited

2nd December 2024