

## Ethical Trading Policy

### 1. Purpose

- 1.1 Alliance (“the Company”) is committed to the practice of responsible corporate behaviour.
- 1.2 Through its business practices the Company seeks to protect and promote the human rights and basic freedoms of all its employees and agents.
- 1.3 Further the Company is committed to protecting the rights of all of those whose work contributes to the success of the Company, including those employees and agents of suppliers to the Company.
- 1.4 The Company is also committed to eliminating bribery and corruption. It is essential that all employees and persons associated with the Company adhere to this policy and abstain from giving or receiving bribes of any form.
- 1.5 This policy is non-exhaustive, and all aspects of the Company’s business should be considered in the spirit of this policy.

### 2. Human Rights

- 2.1 The Company is vehemently opposed to the use of slavery in all forms; cruel, inhumane or degrading punishments; and any attempt to control or reduce freedom of thought, conscience and religion. The Company is committed to driving out acts of human trafficking and modern day slavery within its business and supply chains in accordance with the provisions set out in the Modern Slavery Act 2015.
  - 2.2 The Company will ensure that all of its employees, agents and contractors are entitled to their human rights as set out in the Universal Declaration of Human Rights and the Human Rights Act 1998.
  - 2.3 The Company will not knowingly enter into any business arrangement with any person, company or organisation which fails to uphold the human rights of its workers or who breach the human rights of those affected by the organisation’s activities.
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### **3. Workers' Rights**

- 3.1** The Company is committed to complying with all relevant employment legislation and regulations. The Company regards such regulations and legislation as the minimum rather than the recommended standard.
- 3.2** No worker should be discriminated against on the basis of age, race, sex, gender identity or reassignment, pregnancy and maternity, marital or civil partnership status, physical or mental disability, religion or beliefs, sexual orientation or any other similar characteristic. Workers with the same experience and qualifications should receive equal pay for equal work. The Company has established an Equality, Diversity and Inclusion policy to help to achieve this aim.
- 3.3** No worker should be prevented from joining or forming a staff association or trade union, nor should any worker suffer any detriment as a result of joining, or failing to join, any such organisation.
- 3.4** Workers should be aware of the terms and conditions of their employment or engagement from the outset. In particular workers must be made aware of the wage that they receive, when and how it is to be paid, the hours that they must work and any legal limit which exists for their protection and any overtime provisions. Workers should also be allowed such annual leave, sick leave, maternity/paternity leave and such other leave as is granted by legislation as a minimum.
- 3.5** The Company does not accept any corporal punishment, harassment or bullying in any form.

### **4. Environmental Issues**

- 4.1** The Company is committed to keeping the environmental impact of its activities to a minimum and has established an Environmental Policy to help to achieve this aim. Copies of the Environmental Policy are available upon request.
- 4.2** As an absolute minimum, the Company will ensure that it meets all applicable environmental laws in whichever jurisdiction it may be operating.

### **5. Conflicts of Interest**

- 5.1** The Company holds as fundamental to its success the trust and confidence of those with whom it deals, including clients, suppliers and employees. Conflicts of interest potentially undermine the relationship of the Company with its partners.
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5.2 All officers, employees and representatives of the Company are expected to act honestly and within the law.

## **6. Information and Confidentiality**

6.1 Information received by employees, contractors or agents of the Company will not be used for any personal gain, nor will it be used for any purpose beyond that for which it was given.

6.2 The Company will ensure that it complies with all applicable requirements of data protection legislation (including the Data Protection Act 1998 and the Privacy and Electronic Communications Regulations 2003) in force at any given time.

## **7. Shareholders and Investors**

The Company, its officers, employees and representatives are committed to ensuring that no act or omission which is within their power and which would have the effect of deliberately, negligently or recklessly misleading the shareholders, creditors or other investors in the Company occurs.

## **8. Suppliers and Partners**

8.1 The Company expects all suppliers and partners to work towards and uphold similar ethical and moral standards.

8.2 The Company will investigate the ethical record of potential new suppliers before entering into any agreement. Further, the Company reserves the right to request information from suppliers regarding the production and sources of goods supplied.

8.3 The Company reserves the right to withdraw from any agreement or other arrangement with any supplier or partner who is found to have acted in contravention of the spirit or principles of this Ethical Policy.

## **9. Bribery and Corruption**

9.1 The Company is fundamentally opposed to any acts of bribery and to the making of facilitation payments as defined by the Bribery Act 2010.

9.2 Employees and any other persons associated with the Company such as agents, subsidiaries and business partners are not permitted to either offer or receive any type of bribe or facilitation payment.

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- 9.3** The detection, prevention and reporting of bribery and corruption is the responsibility of all colleagues throughout the Company. All employees are encouraged to report any suspicion of corruption or bribery within the Company in accordance with the Whistleblowing Policy, available upon request.
- 9.4** The Company uses its reasonable endeavours to implement the guidance principles on bribery management that are published, from time to time, by Secretary of State in accordance with Section 9 of the Bribery Act 2010.
- 9.5** If an employee or associated person is found guilty of giving or receiving a bribe they will be personally criminally liable and may be subject to disciplinary action.
- 9.6** Anyone found guilty of bribery will be responsible for bearing any related remedial costs such as losses, court fees or expenses.

## **10. Working Conditions**

- 10.1** 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 minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 10.2** Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- 10.3** Access to clean toilet facilities and to clean drinking water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 10.4** Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- 10.5** Working hours will comply with national laws and benchmark industry standards, whichever affords greater protection.
- 10.6** In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7 day period on average. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate.
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## 11. Living Wages

- 11.1** Wages and benefits paid for a standard working week will meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- 11.2** All workers shall be provided with written and accessible 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.
- 11.3** 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 of the worker concerned. All disciplinary measures should be recorded.

**This policy has been approved & authorised by:**



Name: Paul Bonson  
Position: Director  
Date: 1.10.17