

Apex Stainless Fasteners

ETHICAL TRADING POLICY

Apex Stainless Fasteners believe strongly in ethical principles and good stewardship, trading in accordance with the following Ethical Trading Criteria:

1. All employment is freely chosen.
2. Working Conditions are safe and hygienic.
3. Child Labour is not used.
4. Wages/Salaries are fair and comparable to industry standard and will always exceed the minimum wage.
5. Unauthorised Deductions from wages as a disciplinary measure shall not be permitted.
6. Working hours are not excessive.
7. No discrimination is practised.
8. Regular employment is provided for those who are employed on a permanent contract.
9. No harsh, cruel or degrading treatment or practices are allowed.
10. No bribery, corruption, blackmailing or bullying is permitted.
11. Third Party Suppliers and Buyers (Customers) are both free to sell and buy from any number of other businesses. No restrictions as a means of guaranteeing business are allowed.

Apex also requests all Suppliers to affirm that their businesses are also built on similar ethical criteria.

The full policy statement is noted below:-

Policy Statement

Apex Stainless Fasteners recognises that its commercial activities have potential to impact on suppliers, customers and the locality

As a socially responsible business the Company suppliers, local communities and customers have a right to expect:

- Products sourced or manufactured by Apex Stainless Fasteners are produced under working conditions that are hygienic and safe.
- All workers involved in the delivery of services provided by Apex Stainless Fasteners are treated with full consideration to their basic human rights.
- The Company acts in an ethical manner above and beyond basic legal requirements.
- The Company is committed to implementing the principles of the Ethical Trading Initiative Base Code.
- This policy sets out Apex Stainless Fasteners commitment to its suppliers and customers, setting out the measures taken to ensure that the Company acts in an ethical manner.

Commitment to its suppliers, service providers and customers:

It is recognised that ethical and social performance including reputation are key parts of overall commercial success.

- **Employees:** Apex Stainless Fasteners is committed to ensuring employment practices and the enforcement of corporate regulations ensure the protection of the rights of all those who work for the Organisation. In many areas the Company aims to operate above the minimum standards required by law to ensure employees are safe, rewarded and valued. As the business grows further benefits and opportunities will be provided for staff.

- **Customers:** The Company is committed to demonstrating its ethical and social responsibility credentials to enable customers to make informed choices in respect of products and services they purchase.
- **Suppliers:** The Company is committed to monitoring social standards in the supply chain and in encouraging suppliers to operate to similar ethical standards as employed within the business.

Ethical Trading Code of Practice

This code of practice applies to:

- Staff directly employed by Apex Stainless Fasteners on permanent or temporary contracts.
- Staff employed or provided by contractors or employment agencies to work on Apex Stainless Fasteners premises or to undertake work on behalf of Apex Stainless Fasteners.

No forced, bonded or involuntary labour shall be used.

- All employment with Apex Stainless Fasteners is freely chosen.
- Staff are not required to lodge funds, deposits or identity papers with the company.
- All staff are free to leave Apex Stainless Fasteners after reasonable notice as outlined in the Contract of Employment.

No Child Labour shall be used.

- There shall be no recruitment of child labour.
- Children or persons under 16 are not employed at any time.

Working Conditions are safe and hygienic.

- Apex Stainless Fasteners takes adequate measures to prevent accidents and minimise potential hazards.
- Staff are given regular health and safety training.
- Staff are provided with unrestricted access to toilet facilities and drinking water.
- Apex Stainless have a published Health and Safety Policy.

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

- Staff pay rates are above national legal minimum standards.
- Staff are not forced to work in excess of 48 hours per week.
- Staff are provided 2 days off per week (weekend).
- Staff are issued with written terms and conditions of employment that detail the employment relationship and the respective obligations between the employee and employer, rates of pay, working hours, grievance and disciplinary procedures, holiday entitlement, absence and sick pay rules and notice periods for termination of employment.
- No unauthorised deductions are made from wages as a disciplinary measure, and pay slips detailing lawful deductions are provided for each pay period.

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 are expressly prohibited and would be considered grounds for summary dismissal if proved.

Organisation:

The Board of Directors of Apex Stainless Fasteners have overall responsibility for all aspects of ethical trading at work within the business.

Looking forward towards the future:

Apex Stainless Fasteners are keen to learn from others and welcome feedback or comment regarding this policy or practice.

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