



# MARCON FIT OUT LTD

## ETHICAL TRADING STATEMENT

### Policy Statement

Marcon believes strongly in ethical principles and good stewardship. We are therefore proud to guarantee that we trade according to the following ethical trading criteria based on the ETI base code:

- All employment is freely chosen.
- Working conditions are safe and hygienic.
- Child labour is not used.
- Wages are fair and comparable to industry standard and will always exceed minimum wage.
- Deductions from wages as a disciplinary measure shall not be permitted
- Working hours are not excessive.
- No discrimination is practiced.
- Regular employment is provided for those who are employed on a permanent contract.
- No harsh, cruel, or degrading treatment or practices are allowed.
- Freedom of association and the right to collective bargaining are respected.
- No bribery, corruption, blackmailing, or bullying is permitted.
- 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.
- We shall promote the optimization of the use of energy and natural resources and reduce the generation of waste and pollution.
- We shall refuse to work with any client or prospective client when we have reason to believe that they exploit humans, animals, or the environment unfairly.

This statement has been signed by the CEO to demonstrate the Board's commitment. It has been adopted by the Board of Directors of each subsidiary.

### Marcon Ethical Trading Policy

Marcon has several fundamental principles and values which it believes are important to uphold and are contained in this Ethical Trading Policy. The Policy expresses the standards concerning, safe and fair working conditions for employees, responsible management of social and environmental issues within the Company and its supply chain.

#### 1. Employment is freely chosen

- There is no forced, bonded, or involuntary labour.
- Employees are not required to lodge "deposits" or identity papers with us.

## **2. 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 and drinking water shall always be provided .
- Marcon has a published Health and Safety Policy.

## **3. Child labour shall not be used**

- There shall be no recruitment of child labour.
- Children or persons under 16 are not employed at any time day or night.
- Children and young persons under 18 shall not be employed at night or in hazardous conditions.

## **4. Living wages are paid**

- Wages and benefits paid for a standard working week 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.
- 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.

## **5. Deductions from Pay**

- 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.

## **6. Working hours are not excessive**

- Working hours comply with national laws and benchmark industry standards, whichever affords greater protection.
- In any event, workers shall not on a regular basis be required to work more than 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, and shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at premium rate.

## **7. No discrimination is practised**

- There is no discrimination in hiring, compensation, access to training, promotion, termination, or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

## **8. Regular employment is provided**

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

## **9. 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.

## **10. 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.
- Marcon 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 reasonable representative functions in the workplace.
- 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 and bargaining.

## **11. Employment Agencies**

- Employment agencies contracted to supply temporary staff shall demonstrate commitment to and application of the requirements of this policy.
- Employment agencies contracted to supply temporary staff shall ensure that all staff supplied to Marcon are eligible to work in the UK by following Immigration and Nationality Directorate Guidelines on Amendments to Section 8 of the Asylum and Immigration Act 1996.
- Ensure that the requirements of the Immigration and Asylum Act 1999 Section 22 Code of Practice are met.
- Employment agencies contracted to supply temporary staff shall ensure that all staff supplied Marcon have sufficient command of English to understand the company's

Health & Safety requirements and the written statements of employment particulars or have other measures in place to ensure that all these requirements are communicated in the employee's native language.

## 12. Environmental Impact

- Suppliers should as a minimum, comply with all statutory and local legal requirements relating to the environmental impacts of their business in their country. In addition, steps will be taken to optimise the use of energy and natural resources and reduce the generation of waste and pollution.

## 13. Organization

The Marcon Directors have overall responsibility for all aspects of ethical trading at work within the business and are always looking towards further improvement.

The provisions of this policy constitute minimum and not maximum standards.

This policy has been signed by the Company Director to demonstrate the Board's commitment.

It has been adopted by the Board of Directors of each subsidiary.

Mr Mark O'Connor

A handwritten signature in blue ink, appearing to read "Mark O'Connor".

Mr Mark McElroy

A handwritten signature in blue ink, appearing to read "Mark McElroy", written over a horizontal dashed line.

JOINT MANAGING DIRECTORS

DATE: 6<sup>th</sup> January 2020