



# ETHICAL TRADING POLICY

## POLICY STATEMENT

GAP Group UK (Incorporating PA Moody Recycling Limited, GAP Waste Management & Transport, GAP Materials Processing Limited, GAP Ice, SIRG GAP Polymers, GAP Organics, and NEST Road Developments Limited), hereinafter referred to as "GAPGPAUK," recognises the responsibility that they share with their suppliers to operate ethically. Promoting decent working conditions in our supply chains is part of our strategy to act in a social responsible manner. In pursuit of our aims, we require that all our suppliers comply with our Ethical Trading Policy, which is based on the Fundamental Conventions of the International Labour Organisation (ILO) and national and international laws.

We expect all our suppliers to have ethical processes and policies in place throughout their supply chain. We will monitor supplier compliance with this policy through [insert method] and/or through a range of other tools to support the risk management, continuous improvement and capacity building of our suppliers, including the requirements for suppliers to provide reasonable information as evidence of compliance to with our Ethical Trading Policy.

## 1.0 COVERAGE

GAPGPAUK, seeks to ensure that it only purchases goods that are produced and delivered under conditions that do not involve the abuse or exploitation of ant person, and that such goods or services provided have the least negative impact on the environment.

The Ethical Trading Policy expresses the lawful and moral conditions under which GAPGPAUK trades and applies to all our employees.

## 2.0 MANAGEMENT RESPONSIBILITY

### 2.1 Management Commitment

The Directors and Management of GAPGPAUK are committed to meeting the requirements of all relevant UK, EC, and EEC Legislation and Directives relating the human rights of its workforce, and will continue to demonstrate their commitment through this policy and the Group HR/HSE policies.

The Ethical Trading Policy will be reviewed by the Managing Director and the quality policy director. The enforcement of this policy is the responsibility of all employees, but will be overseen by quality policy director and the Managing Director.

The commitment is contained within:

- The Ethical Trading Policy
- HR Policies

- Health and Safety Policy and Procedures
- Environmental Policy and Procedures
- The Company induction
- Internal movement plans
- Posting of a Statement of Ethical Trading Policy
- Internal engagement processes and systems

### **3.0 ETHICAL TRADING POLICY AND GUIDELINES**

#### **3.1 Ethical Trading Policy**

As an indication of the commitment of the Management of GAPGPAK, this Ethical Trading Policy has been drawn up to provide a framework to aid the achievement of our ethical goals. All efforts are made to ensure this Policy is communicated and understood within our organisation, and the Policy is reviewed regularly to ensure its continued suitability.

#### **3.2 Fair Trading**

All raw materials used in our processes are sourced in an open market from reputable suppliers.

GAPGPAK does not take part in any activities which enforce prime material producers to operate under restrictive pricing or trading practices which could affect their livelihood.

Suppliers of all materials used in our processes are audited either directly or by questionnaire. Materials are only purchased from suppliers on our approved supplier list.

GAPGPAK never knowingly trades with organisations that operate unethical practices.

#### **3.3 Protection Of Children**

No children under the age of 16 are employed by GAPGPAK, and as such we enforce the "right to work" as per the Immigration, Asylum, and Nationality Act.

Young workers applying for employment of an age between 16 and under 18 will, following an offer being made, be subject to the appropriate Young Workers Risk Assessment and related provisions, which will include 30-minute rest breaks, max. 0 hour week, and restricted hours of work, as per the Working Time Directive,

Children under the age of 18 and still in full-time education may be offered work experience as part of a recognised education scheme. In such cases, they are not bound to the Company in any way and attend the workplace by their own free will decision.

#### **3.4 Health And Safety, And Working Conditions**

Management are committed to the Health and Safety of all employees. A Health and Safety Committee comprising of representatives of all areas of the Company meets regularly.

Risk Assessments are carried out at regular intervals and/or following any major change to the work environment. Action is taken to reduce risks identified in Risk Assessments wherever it is practical to do so.

### **3.5 Equal Opportunities**

GAPGPAUK operates an equal opportunities policy that ensure there is no employment discrimination on grounds of sex, race, religious, ethnic, or social groupings. This is also contained within the group Equality Policy.

### **3.6 Freedom Of Association**

Employees are free to join any trade unions or associations of their choosing.

### **3.7 Remuneration**

Employees are remunerated in line with, or above, industry standards, minimum wage, and living wage. Changes to pay and/or conditions of employment are made only after discussion with appropriate bodies representing the interests of the workforce and/or the employee. All changes are authorised by the senior team and confirmed in writing with the employee.

All employees are given holiday in-line with, or above, their statutory entitlement and basic work hours in compliance with the European Work Time Directive.

Although overtime agreements may be made with the workforce collectively, no individual is required by Company policy to work more than the maximum hours set out in the European Work Time Directive, however all overtime is voluntary.

## **4.0 ETHICAL TRADING GUIDELINES**

### **4.1 Ethical Trading Initiative (ETI) Base Code**

In addition to the above, GAPGPAUK is committed to comply with the Ethical Trading Initiative (ETI) Base Code.

Suppliers to GAPGPAUK shall commit to the same ETI Base code encompassing the following:

#### **4.1.1 Employment Is Freely Chosen**

- There is no forced, bonded or involuntary prison labour.
- Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

#### **4.1.2 Freedom Of Association And Right To Collective Bargaining Are Respected**

- Workers, without discretion, have the right to join or form a trade union of their own choosing and bargain collectively.
- The employer 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.

- Where the right of freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder the development or parallel means for independent and free association and bargaining.

#### **4.1.3 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 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 will be repeated for new or assigned workers.
- Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- The Company observing the code shall assign responsibility for Health and Safety to a senior management representative.

#### **4.1.4 Child Labour Shall Not Be Used**

- There shall be no new recruitment of child labour.
- Companies shall develop or participate in, and contribute to, policies and programmes which provide for the transition of and child found to be performing child labour to enable them to attend and remain in quality education until no longer a child; "child" and "child labour" being defined in the appendices.
- Children and young persons under the age of 18 shall not be employed at night or in hazardous conditions.
- These policies and procedures shall conform to the provisions of the relevant ILO standards.

#### **4.1.5 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 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 of wages before they enter employment, and about particulars of their wages for the pay period concerned each time they are paid.
- 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.

**4.1.6 Working Hours Are Not Excessive**

- Working laws 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 in excess of 48 hours per week, and shall be provided with at least one day off every seven 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.

**4.1.7 No Discrimination Is Practiced**

- 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.

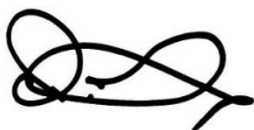
**4.1.8 Regular Employment Is Provided**

- To every extent possible, work performed must be on a basis of 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.

**4.1.9 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.

The provision of this code constitutes minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying this code are expected to comply with the national and other applicable law, and, where the provision of law and where the provisions of law and the base code address the same subject, to apply that provisions which affords the greater protection.

A handwritten signature in black ink, appearing to read "Peter Moody".

Peter Moody  
**Managing Director**

Date: 04/06/2020