

INTRODUCTION

Carnell Support Services Ltd recognise our responsibility to share with our suppliers an expectation that all products purchased shall be sourced in an ethical manner. We want our clients to be confident that people are treated fairly, are not exploited, nor are they exposed to unsafe working conditions. Our Ethical Sourcing policy requires all our suppliers to have similar policies and controls in place to ensure this level of commitment is cascaded down the supply chain.

COMMITMENT TO ETHICAL TRADING

We recognise the need to communicate our commitment to stakeholders including suppliers and the people who work with our suppliers. We seek to develop long term relationships with key suppliers who share our ethical standards. These relationships are based on the principle of fair, open, and honest dealings at all times. Only suppliers that share our standards and can demonstrate compliance will be considered appropriate.

Carnell Support Services Ltd is committed to driving out acts of modern slavery and human trafficking within its business and from within its supply chain, including sub-contractors, and partners.

The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation.

As part of the Company's due diligence process to ensure slavery and human trafficking does not exist within our supply chain the supplier approval process will incorporate a review of the controls undertaken by the supplier. Imported goods from sources from outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored.

The Company will not support or deal with any business knowingly involved in slavery or human trafficking. We consider that any exposure to risk of Modern Slavery or Human Trafficking is extremely low, and that should any risk exist it is most likely to be within the extended supply chain.

Carnell Support Services Ltd shall ensure, as far as reasonably practicable, that their suppliers, subcontractors, and partners who are directly or indirectly involved in the provision of goods and/or services to Carnell Support Services Ltd will comply with the Ethical Trading Initiative (ETI) Base Code:

1. EMPLOYMENT IS FREELY CHOSEN

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

2. FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING ARE RESPECTED

Workers have the right to join or form trade unions of their own choosing and to 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 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.

3. WORKING CONDITIONS ARE SAFE AND HYGIENIC

A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of 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 reasonably practicable the causes of hazards inherent in the working environments. Workers shall receive regular recorded health and safety training. Workers are provided with access to clean toilet facilities and to safe drinking 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. A senior management representative shall be responsible for Health and Safety.

4. CHILDLABOUR SHALL NOT BE USED

There shall be no use of child labour. In the event of any child found to be performing child labour, they shall be removed from the workplace immediately. The supplier shall then participate and contribute to the provision for the transition of the child to enable her or him to attend quality education until no longer a child. Young persons under 18 shall not be employed at night or in hazardous conditions. These policies and procedures relating to Child Labour shall conform to the provisions of the relevant International Labour Organisation (ILO) Standards.

5. LIVING WAGES ARE PAID

Wages and benefits paid for a standard working week meet, at a minimum, national legal or industry benchmark standards, whichever is higher. In any event wages shall 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 including information with respect to wages before they enter employment, and about the 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.

6. WORKING HOURS ARE NOT EXCESSIVE

Working hours must comply with national laws, collective agreements, and the provisions set out below, or whichever affords the greater protection for workers. These provisions are based on international labour standards:

- Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week*
- All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: a) the extent, frequency and hours worked by individual workers and the workforce as a whole, b) it shall not be used to replace regular employment. c) overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.
- The total hours worked in any 7-day period shall not exceed 60 hours, unless in exceptional circumstances and where all the following are met:
 - This is allowed by national law.
 - This is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce.
 - Appropriate safeguards are taken to protect the workers' health and safety.
 - The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents, or emergencies.
- Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period. *

**International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced*

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 on the basis of recognised employment relationships 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, sub-contracting 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.

Signed: 

Andrew Sharp – Managing Director