



## ETHICAL TRADING POLICY

### 1. INTRODUCTION

Social responsibility is an important value of our business. It is vital that services provided by Dougland are performed under humane working conditions and with respect for workers and their human rights and the environment.

### 2. EMPLOYMENT OF CHILDREN

Children under fifteen or the minimum working age according to International Labour Organisation (ILO) exemptions, shall not be recruited or employed.

Children under 18 years of age will not work at night or in hazardous conditions. Children of ages 16 to 18 may be employed provided that there is no risk to health and safety and all local authority requirements are complied with.

### 3. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Dougland will recognise and respect the rights of workers freely to join associates (such as workers councils, trade unions and workers associations) which can collectively represent their interests and shall not interfere with or attempt to dominate or control such bodies, nor discriminate against workers choosing to belong to them.

### 4. WAGES

Wages will be paid direct to the workers either by cheque or into their nominated bank account, at the agreed intervals, promptly in full. Information relating to wages will be available to workers in an understandable form

Wages and benefits will be at least fully comparable with locally benchmarked industry norms and legal requirements.

No deductions from wages, other than required by national law, will be actioned without the express agreement of the worker concerned.

### 5. HOURS OF WORKING

Hours of work will conform with National Laws and industry norms and will not be excessive.

Workers will not, on a regular basis, be expected to work in excess of 48 hours per week or less if there is a lower national limitation. Overtime will be voluntary.

There will be proper provision for rest and breaks, holiday allowance and rest periods shall be in full accordance with the national laws. Individual workers shall have on average at least one full day's rest per 7 days or the equivalent if shift work is involved.

### 6. SECURITY OF EMPLOYMENT

All workers shall be provided with simple, written contracts, a copy of which they can retain. Dougland will not employ workers on repeated temporary contracts or schemes merely to avoid paying wages and other benefits given to permanent workers.

Disciplinary procedures will be clearly documented and communicated to all employees. All disciplinary measures of a serious nature will be recorded.

## **7. WORKING CONDITIONS**

Dougland will provide for their employees working conditions, which would be recognized locally as good.

Physical abuse, the threat of physical abuse, sexual harassment and other forms of intimidation, including verbal abuse is not acceptable.

Dougland will take effective steps, which are at least in compliance with the requirements or recommendations of government and/or local authorities, to avoid the employment of illegal immigrants.

## **8. HEALTH AND SAFETY**

Dougland will comply with all national and local health & safety laws. Where Dougland subscribes to other codes of practice or standards on health & safety these will also be met.

Dougland will assign a senior management representative to be responsible for health and safety issues. Workers health and safety will be regularly monitored.

No one will be employed in potentially hazardous conditions without receiving adequate safety training and supervision. Records of safety training will be maintained. Individual workers will be able to demonstrate their understanding of the job and the ability to perform it to at least the minimum standard required by Dougland.

Dougland will provide appropriate protective clothing and safety equipment free of charge to their workers. Every effort will be made to provide safe and hygienic working conditions and steps taken to minimise the risks of fire, accident and injury to workers.

## **9. EQUALITY OF TREATMENT**

Workers, subject to ability, shall have access to jobs, training and benefits on equal terms. There shall be no discrimination on the basis of gender, age, disability, ethnic origin, colour, marital status, sexual orientation, political opinion, union (or non union) membership, religion, caste, social origin or nationality.

Workers will not be expected to perform duties incompatible with their physical or mental abilities.

## **10. ENVIRONMENT**

Dougland will seek to make continuous improvements to their environmental performance and as a minimum, comply with the requirements of local and international laws and regulations.

Dougland will make practical efforts to minimise the use of energy, water and raw materials, where possible these resources shall be renewable.

Dougland will make practical efforts to minimise waste. Waste shall be disposed of in an efficient, safe and environmentally responsible way and in full compliance with national laws. Dougland will avoid contamination of the local environment and ensure the air, noise and odour pollution is within nationally defined limits.