



# Ethical Trading and Human Rights Policy



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## 1. Policy Statement

Barfoots have adopted the Ethical Trade Initiative (ETI) base code to guide our standards and to give us the confidence that we are doing all that we can to ensure that all our colleagues, staff and workers enjoy fair and decent treatment and that their human rights are respected and fully met.

Where any potential impact is identified in relation to Human Rights it is the Company's policy to investigate such issues and implement appropriate action to prevent it from becoming an actual issue. In such matters the Finance Director will be notified of the potential issue and, through consultation with the HR Manager, will agree a corrective action plan to negate the issue.

## 2. Scope of Policy

This policy applies to all processing sites and offices within Barfoots of Botley Ltd and in particular to all staff that have a managerial or supervisory responsibility for colleagues and workers

## 3. Responsibilities

The HR Manager and members of the HR Team are responsible for ensuring that the policy is clearly communicated to the colleagues, staff, line management and agency labour providers. The HR Manager is responsible for supporting production sites to comply with the policy.

## 4. Our Standards

### 4.1 Employment:

To promote permanent employment wherever possible and to work with our Customers so that we can adopt a planned approach to the use of agency workers. The HR Manager is responsible for supporting production sites to comply with the policy.

### 4.2 Equality:

4.2.1 To ensure that our recruitment practices protect workers and ensure fair, consistent and equal treatment such that there is no discrimination in recruitment, pay or promotion decisions based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

4.2.2 We do not use and will not recruit child labour, prison or bonded labour or forced labour of any description.

## 4. Our Standards

### 4.2 Equality:

- 4.2.3 The Company will not levy any charge on an employee whether financial or otherwise for employment with the Company and will not retain employee's original documents.
- 4.2.4 Employees are free to leave the Company of their own accord at any time with the requisite contractual notice.

### 4.3 Fair pay

- 4.3.1 To ensure equal access to jobs and equal pay for work of equal value and that pay for the standard contractual week at least meets the National Minimum Wage.
- 4.3.2 Overtime that is worked in excess of the base contractual hours will be paid at a premium rate.

### 4.4 Safe and hygienic working conditions

- 4.4.1 To provide all workers with unrestricted access to decent standards of equipment and facilities whilst at work to ensure that their working conditions are safe and hygienic.
- 4.4.2 Workers will receive regular and appropriate health and safety training, both as part of their Company Induction program and on an on-going basis to meet the standards set by the Health and Safety Manager.
- 4.4.3 Young persons under 18 years of age are not allowed to work at night or in hazardous conditions.

### 4.5 Working hours

- 4.5.1 Working hours will not be excessive. The total hours worked in any seven day period shall not exceed 60 hours, except where covered by clause 4.5.2 below.
- 4.5.2 Working hours may exceed 60 hours in any seven day period only in exceptional circumstances where all of the following are met:
  - This is allowed by national law;
  - This is allowed by a collective agreement freely negotiated with an employee consultative body representing a significant portion of the workforce;
  - Appropriate safeguards are taken to protect the worker's Health and Safety; and
  - The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

#### **4.5 Working hours**

- 4.5.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment.
- 4.5.4 Workers will be provided with at least one day off in every seven day period or, where allowed by national law, two days off in every fourteen day period.

#### **4.6 Grievance resolution and whistle blowing**

- 4.6.1 To give all workers the opportunity to raise concerns and get resolutions by either following the Company's grievance procedure or by using "Speak Up", our confidential, multi-lingual reporting line.
- 4.6.2 All workers have the right to freedom of association and to join a trade union or other worker body for the purpose of consultation, negotiation and representation.

#### **4.7 No harsh or inhumane treatment**

No harsh or inhumane treatment is allowed. Actual or threatening physical abuse, sexual or other harassment, or verbal abuse or any other form of intimidation or bullying are expressly prohibited and regarded as gross misconduct under the Company's disciplinary policy.