



**BRITANNIA SUPERFINE LTD**

**ETHICAL TRADING AND RESPONSIBLE SOURCING  
POLICY**

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**Britannia Superfine Limited Ethical Trading & Responsible Sourcing**

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**ETHICAL POLICY**

Britannia Superfine Limited is committed to:

- Conducting its business and expecting all its employees to conduct themselves and the business of the Company in an honest and ethical manner
- Ensuring that all its employees are treated equally and fairly
- Not discriminating in employment opportunities or practices based on gender, race, creed, colour, religion, sex, marital status, national origin, age, pregnancy, citizenship, disability, sexual orientation, union membership, political affiliation, veteran status or any other characteristic protected by applicable national laws

**ETHICAL POLICY COMMITMENTS**

***Freedom of Employment***

- The Company will not engage in the use of forced, bonded or involuntary prison labour
- Employees will not be required to lodge “deposits” or their identity papers with the Company and are free to leave their employment with the Company after reasonable notice

***Employees rights to open and transparent communications and to form workplace representative groups are respected***

- The Company believes in open and transparent communication between employees and management, and where appropriate respects the workers’ rights to belong to collective groups such as trade unions or work councils and to bargain collectively
- The Company adopts an open attitude towards the collective activities of our employees and their organisational activities and employee representatives are not discriminated against and have access to carry out the representative functions in the workplace



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***Safe and Hygienic Working Conditions***

- The Company will provide a safe and hygienic working environment for all its employees, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps will 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
- Employees will receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers
- Employees will have reasonable access to potable water throughout the day, with sanitary facilities for food storage provided
- Procedures to deal with serious injuries requiring medical attention are in place with a full stocked first aid kit provided
- Access to clean and sanitary toilet areas, with no unreasonable restrictions
- Responsibility for health and safety is assigned to a senior management representative

***Working Hours and Wages***

- Working hours, benefits, wages, overtime pay and holiday entitlements comply with the national laws or benchmark industry standards, whichever affords greater protection and are defined by employee contracts
- Employees on a regular basis are not required to work in excess of 48 hours per week and are given at least one day off for every seven. Overtime is voluntary, does not exceed over 12 hours per week, is not demanded on a regular basis and is always compensated
- Though the ETI Base Code recommends that overtime shall always be compensated at a premium rate at no less than 125% of the regular rate of pay, following a business case analysis to address this requirement it has been determined under our current business model that this is not viable



- BSL's business is diverse and operates in a number of highly competitive markets selling to a wide range of customers, by increasing the overtime premium to meet the ETI Base Code recommendation BSL risks becoming uncompetitive against companies outside of the UK with significantly lower labour rates. Therefore, to continue to compete in such an environment BSL could end up employing fewer people who end up working longer hours
- As the largest employer in Polegate, BSL wants to ensure it continues to operate in a responsible and sustainable manner. BSL runs a 3-shift system, and it will mainly manage unpredictable increases in business volume through increasing the number of staff working on these shifts; so that it can continue to employ people on a longer-term basis.
- BSL does not want to develop a culture where people become over reliant on overtime as part of their normal wage and recognising the outcome of the business case analysis is implementing a number of procedures to better manage overtime usage
- BSL commits to review this position as a minimum on an annual basis to ensure that if it becomes possible to meet this ETI Base Code Requirement that it does so in a sustainable way
- Wages are paid promptly, directly into employees bank accounts or by other mutually agreed method, which does not use company tokens
- Deductions from wages as a disciplinary measure is not permitted nor are any deductions from wages not provided for in national law permitted without the expressed permission of the employee concerned. All disciplinary measures are recorded
- All employees are provided with written and understandable information about their employment conditions with respect to their hours of work and wages before they enter employment
- Employees are provided with paid annual leave and holidays as required by national law



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***Child Labour shall not be used***

- There will be no recruitment of child labour
- Children and young persons under 18 will not be employed at night or in hazardous conditions
- The Company's policies and procedures on child labour conform to the provisions of the relevant ILO standards – Minimum Age Convention 1973 (No 138)

***No discrimination is practised***

- The Company does not discriminate in employment opportunities or practices based on gender, race, creed, colour, religion, sex, marital status, national origin, age, pregnancy, citizenship, disability, sexual orientation, union membership, political affiliation, veteran status or any other characteristic protected by applicable national laws

***Regular employment is provided***

- Only workers with a legal right to work shall be employed
- All workers must be validated for their legal right to work by reviewing original documentation (not photocopies) before they are allowed to commence work
- To every extent possible work performed will be on the basis of a 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 will not be avoided through the use of labour-only contracts, sub-contracting, or home working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor will any such obligations be avoided through the excessive use of fixed-term contracts of employment

***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 is prohibited



### **MODERN DAY SLAVERY COMMITMENTS**

- Britannia Superfine Limited is aware of the modern slavery risks and understands its responsibility towards adherence to the Modern Slavery Act 2015
- Following a review in 2017 it was identified that the only area of potential risk within its own business with regards to modern slavery was the use of agency staff. It was therefore decided that Britannia Superfine Limited would no longer permit the use of agency staff and that all its employees had to be directly employed
- One of the Directors of the Company has been assigned responsibility for human rights, ethical trade, corporate social responsibility and prevention of modern slavery with the business
- The Company has a Modern Day Slavery Statement that has been signed off by its board of directors and is reviewed annually by the Senior Management team
- 2 members of the senior management team have undertaken training on modern day slavery
- The Company's recruitment procedure incorporates all the requirements of the Modern Slavery Act 2015 and all managers with a responsibility for recruitment have been trained on the procedure
- The Company's Codes of Conduct which applies to all employees includes the Company's Anti-Bribery and Whistleblowing policies
- The Company has a formal written process for managers, supervisors and workers to report and record suspected cases of labour trafficking, forced labour and other hidden labour exploitation. Managers and supervisors are made aware of the signs to look out for and encouraged to raise concerns
- The Company has committed to trying to achieve transparency within its own supply chain and where incidences are found, to establish action plans to help drive continuous improvement action plans within its supply chain

### **RESPONSIBLE SOURCING POLICY**

- Britannia Superfine Limited is committed to working collaboratively with its suppliers to create a sustainable industry
- The Company will do this through building collaborative and trusted partnerships with approved suppliers through development of mutually beneficial relationships, ensuring social and economic responsibility and environmental sustainability



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- The company recognises that its supply chain is diverse and varies in terms of categories and geographies, so will take a proactive approach in establishing transparency and traceability throughout its supply chain
- Britannia Superfine Limited expects its suppliers to accept social, ethical and environmental responsibility and to actively engage in developing and implementing processes that drive them to operate in a responsible and sustainable manner, with a focus on continuous improvement

**RESPONSIBLE SOURCING COMMITMENTS**

- The Company will only use suppliers who have been approved through the Company's supplier assessment and approval procedure
- Supplier reviews will be undertaken at a minimum once every two years. This will include a review of supplier assessment questionnaires
- The Company will have written agreements with all its approved suppliers which include (KPIs, SLA's, Payment terms)
- Supplier approval will be based on commercial and technical KPIs
- The Company commits to communicating a summary of the annual review of its CSR objectives internally with staff.

C K Manser  
Managing Director