



Sommerford Associates

Ethical Trading Policy

Principles: This document sets out Sommerford Associates' Ethical Trading Policy and the responsibilities of everyone employed at Sommerford Associates.

Document Control

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July 2020	Andy Davies	1.0	First version of Ethical Trading Policy

Document Approvals

Sponsor Approval	Name	Date
Managing Director	Andy Davies	27th October 2020

Document Distribution

- This document will be made available as a source of reference to all employees and contractors.

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1. Scope

This policy outlines Somerford Associates (SA) commitment to operate and trade in an ethical manner.

2. Policy Statement

SA believe strongly in ethical principles and good stewardship and are therefore proud to guarantee trade will be in accordance with the following Ethical Trading Criteria:

- All employment is freely chosen
- Working conditions are safe and hygienic
- Child labour is not used
- Wages are fair and comparable to industry standard and will always exceed the minimum wage
- Deductions from wages as a disciplinary measure shall not be permitted
- Working hours are not excessive
- No discrimination is practised
- Regular employment is provided for those who are employed on a permanent contract
- No harsh, cruel or degrading treatment or practices are allowed
- No bribery, corruption, blackmailing or bullying is permitted
- Third Party Suppliers and buyers are both free to sell and buy from any number of other businesses.
- No restrictions, as a way of guaranteeing business, are allowed

SA recognises that commercial activities have a potential to impact on suppliers and locality. As a socially responsible business, suppliers, local community and customers have a right to expect:

- Products manufactured and sourced by SA are produced under working conditions that are hygienic and safe
- All workers involved in the delivery of services provided by SA are treated with full consideration to their basic human rights
- SA acts in an ethical manner above and beyond basic legal requirements.

3. Somerford Associates Commitment

SA recognises that ethical and social performance and reputation is a key part of overall commercial success.

Employees

SA is committed to ensuring that employment practices and the enforcement of corporate regulations ensure the protection of the rights of all those who work for SA.

In many areas we aim to operate above the minimum standards required by law to ensure employees are safe, rewarded and valued.

As the company expands and becomes larger SA will be able to offer more opportunities to staff.

Customers

SA is committed to demonstrating its ethical and social responsibility credentials to enable customers to make informed choices about whose services they purchase.

SA as a company and its employees, will not be involved in any of the following practices:

- Bribery of foreign officials, potential customers or perceptions of bribery
- Companies interference in ethnic and tribal conflict or violence
- Trade influence on other governments' domestic politics
- International price fixing

Suppliers

SA is committed to monitoring social standards in the supply chain, and encourages suppliers to operate with the same ethical standards.

4. Somerford Associates Code of Practice

The code of practice applies to:

- Staff directly employed by SA on temporary or permanent contracts
- Staff employed or provided by contractors or employment agencies to work at SA premises or to undertake work for or on behalf of SA

No forced, bonded or involuntary labour shall be used:

- All employment with SA is freely chosen
- Staff are free to leave SA after their agreed notice period

No child labour shall be used:

- There shall be no recruitment of child labour
- Children or persons under 16 are not employed at any time, day or night (Work Experience excluded)
- Persons under 18 have their hours restricted in line with current employment law

Working Conditions are safe and hygienic:

- SA takes adequate measures to prevent accidents and minimise potential hazards via Risk assessments and Safety Rules
- Staff receive regular Health & Safety training
- Staff have unrestricted access to toilet facilities and drinking water

Working hours and remuneration are reasonable and comparable to other companies in our sector and regular employment is provided.

- Staff pay rates are above the national legal minimum standards
- Staff are not forced to work in excess of 48 hours per week, a voluntary opt out agreement is available for those wishing to work in excess of 48 hours per week
- Staff are provided 2 days off per week
- Staff are given written terms and conditions of employment that details the employment relationship between and the respective obligations of the employee and employer, rates of pay, working hours, grievance and disciplinary procedures, holiday entitlement, absence and sick pay rules and notice periods for termination of employment
- No deductions are made from wages as a disciplinary measure and pay slips detailing lawful deductions are provided for each pay period
- Labour only contracting, sub contracting and fixed term contracts are not used as a means to avoid obligations under labour or social security laws

Discrimination No discrimination is practiced:

- There is no discrimination in pay, hiring, compensation, access to training, promotion, and termination of employment or retirement on the grounds of race, nationality, religion, age, disability, marital status, sexual orientation, union membership or political affiliation
- Opportunities for personal and career development are equally available to all employees

Harassment

- No harassment, threats, abuse or intimidation shall be practised. Physical, verbal and sexual threats, abuse, harassment or intimidation is expressly prohibited and grounds for summary dismissal, if proven.

Organisation

SA Directors have overall responsibility for all aspects of ethical trading at work within the business.