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ETHICAL TRADING POLICY - ANTI-SLAVERY, ANTI-BRIBERY, HUMAN TRAFFICKING AND CONFLICT MINERALS

1. Introduction

1.1. The Ethical Trading Policy (Anti-Slavery, Anti-Bribery, Human Trafficking and conflict minerals) policy sets out the Organisation's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring there is no slavery, bribery, human trafficking or use of resources from conflict zones in its own business or our supply chain.

2. Responsibilities

- 2.1. We will take the necessary steps to ensure slavery and human trafficking is not taking place in our supply chain, labour force or any part of our business.
- 2.2. We oppose any use of slavery or human trafficking, and we fully support the promotion of ethical and lawful business practices within our workplace.
- 2.3. We will not tolerate or condone any form of practice that constitutes slavery or human trafficking whatsoever and to this end we shall carry out due diligence and auditing and put in place safe reporting mechanisms. 2.4. We will adhere to the Modern Slavery Act 2015 and Ethical Trade Initiative (ETI) guidelines in all areas where people are at potential risk.
- 2.4. We will not obtain minerals and materials resource from regions subject to conflict IAW guidance from the Conflict Minerals (Compliance) (Northern Ireland) (EU Exit) Regulations 2020
- 2.5. We will not conduct or condone any form of bribery in our business practices, be that in obtaining sales, contracts our other commercial advantages via the payments, gifts or favour.

3. Our Supply Chain and Labour Force

- 3.1. Our supply chain is an important part of our success and our culture. We expect each of our business partners to conduct their business with the same commitment, and to this end we will assess all suppliers to our business.
- 3.2. The workplace practices that we expect from ourselves, and our suppliers include:
- 3.2.1. not to use slave labour, illegal child labour or forced labour
 - 3.2.2. ensuring that the overall terms of employment are voluntary
 - 3.2.3. following all local applicable laws pertaining to minimum age requirements, wages, overtime and benefits
 - 3.2.4. following all local applicable laws pertaining to the number of hours worked in a seven (7) day week





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3.2.5. periodically certifying that they conform to the expectations described above and that all materials incorporated into their products comply with the laws regarding human trafficking and slavery.

3.3. Suppliers must be able to demonstrate compliance with this Policy at the request and satisfaction of the Company. From time to time we will conduct audits and surveys of our workforce and supply chains to evaluate and address risks of human trafficking and slavery.

3.4. Supplier must show evidence of implementation of a policy iaw the Conflict Minerals (Compliance) (Northern Ireland) (EU Exit) Regulations 2020 to ensure no minerals are sources from regions on conflict.

4. Relevant Policies

4.1. Any claim or indication of human trafficking or slave labour will be taken seriously and will be promptly investigated by Management under our Disciplinary Policy and Procedure, and with support of external agencies as and when required.

4.2. If any violation of this policy is found, the Company will take prompt, remedial measures to address the violation.

4.3. We will provide ongoing training and support to our employees should this be necessary for the correct application of this policy.

5. In the Workplace

5.1. The Management team will carry out all necessary checks as set out in our Recruitment Policy, on all staff who apply to work at the Company.

5.2. The Management team will carry out spot checks across the company to ensure that there is full compliance with anti-slavery, anti-bribery, human trafficking or conflict mineral source laws.

5.3. The Management team will regularly monitor the use of external agency resources and audit where necessary.

5.4. The Management team will investigate carefully and sensitively any claims of slavery, bribery, human trafficking or use of conflict minerals within the company and advise on the best course of action to take, in accordance with their professional code of conduct.

5.5. The Management team will ensure that managers and decision makers with regards to the use of staffing and resources are adequately informed and trained on this policy to achieve company expectations and standards.

5.6. The Organisation will ensure that any future changes to this policy will be reviewed and agreed by the business and its Board members.

5.7. This policy will be reviewed on an annual basis and amended in accordance with any changes to the Modern Slavery Act 2015 or Ethical Trading Initiative.

