

Ethical Trading Policy

Our Commitment

Belfield has a zero-tolerance approach to modern slavery and is committed to ensuring the highest standard of ethical trading, integrity and transparency within its supply chain. This means sourcing products and services in a responsible manner, engaging with suppliers to improve their working practices and providing clear buying processes to ensure that these high standards are maintained.

Belfield is committed to implementing effective systems and controls to ensure that modern slavery and human trafficking is not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015.

The Company also expects the same high standards from all of its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery, and expects that its suppliers will in turn hold their own suppliers to the same standards.

Our Ethical Trading Policy is a core element of our commitment to buy and sell our products responsibly. Belfield takes active steps to ensure suppliers comply with our Ethical Trading Code (ETC), which is drawn from the Ethical Trading Initiative (ETI) and the fundamental conventions of the Internal Labour Organisation (ILO).

In accordance with the Modern Slavery Act 2015, Belfield will publish an annual Slavery and Human Trafficking Statement. In order to provide this statement, Belfield will require annual certification with this policy from all key suppliers.

Supplier Requirement

Belfield will not knowingly engage in business with suppliers who do not comply with the following conditions. These conditions apply equally to direct suppliers and their supply chain.

1. Employment shall be freely chosen.
 - Suppliers must not use any form of slave, compulsory, coerced, forced or involuntary labour.
 - Suppliers must not require workers to lodge deposits or leave their identity papers with their employer after reasonable notice.
 - Suppliers must not arrange or facilitate the travel of workers with a view to exploiting them.

2. Freedom of association and the right to collective bargaining are respected.
 - Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

3. Working conditions are safe and hygienic.
 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall 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.
 - Suppliers are responsible for the provision of personal protective equipment if applicable and must ensure that workers are properly trained in the use of this equipment.

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- Workers life or health must not be endangered due to the inappropriate use of dangerous machinery, unsafe building structure or layout or hazardous chemicals.
 - Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
 - Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
 - Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
4. Child labour shall not be used.
- Suppliers must not employ workers under the minimum legal working age of the country in question.
 - Children and young persons under 18 shall not be employed at night or in hazardous conditions.
5. Living wages are paid.
- Suppliers must ensure that wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
 - Suppliers must ensure that workers are provided with written and understandable information about their employment conditions in respect to wages prior to or upon engagement.
6. Working hours are not excessive.
- Suppliers must ensure that working hours must comply with national laws, worker’s hours should not be excessive and adequate rest periods should be provided.
 - Suppliers must maintain accurate employment records including calculation of pay and hours worked and must co-operate with any request for inspection of the same.
7. No discrimination is practised.
- Suppliers must ensure that there is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
8. No harsh or inhumane treatment is allowed.
- Workers must not be subject to physical or verbal abuse, the threat of physical abuse, sexual or other harassment or any other form of intimidation or inhuman treatment.
9. Entitlement to work.
- Only workers with a legal right to work in the country should be employed by the supplier.
10. Recruitment Agencies
- Recruitment agencies should only supply workers who are registered with them. The recruitment agency must provide full transparency of its recruitment supply chain, including written details of the use of any sub-contractors or sub agents and the terms of engagement between the agency and its sub agents.

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- Relationships with recruitment agencies should be covered by a written term of business which encompasses all national legislation, the services that the recruitment agency will provide and the hiring process(es) adopted.
- The recruitment agency must not charge workers directly or indirectly, in whole or in part, any fees or costs.
- Recruitment agencies will be audited on an annual basis, to ensure compliance with both our customer(s) and our own ethical standards and to ensure that legal standards/ legislation is adhered to.
- Where a recruitment agency does not comply with any of our/customers ethical or legal standards then they will be issued with a corrective action plan which must be addressed within appropriate timescales dependant to the criticality of the issue.
- Audits of recruitment agencies maybe announced or unannounced and evaluation of the recruitment agency will be conducted either by ourselves or through an independent party.
- Where a recruitment agency fails to comply with a corrective action and the non-compliances remain unresolved in the specified timeframe(s), the company reserves the right to terminate its terms of business with the recruitment agency.
- The results of any audit will be fed back to the recruitment agency and to our customers.

11. Audits

- We assess all our suppliers through a risk-based system and then monitor them accordingly. The Company will determine the level of ethical risk posed by each supplier through the use of appropriate assessment tools, where it is deemed necessary and at the request of Belfield, an ethical audit either conducted by ourselves or a third party independent company may be required to demonstrate compliance and to ensure any non-compliances are addressed within the timescales appropriate to the criticality.
- Suppliers should promptly report any known breach of this Policy to Belfield and take the required corrective action to rectify any issues within appropriate the timeframes.

In addition to the above, all suppliers are required to adhere to the following:

- Suppliers must not obtain goods or services from countries subject to US and UK/EU sanctions lists.
- Suppliers must not engage in bribery, corruption or falsify documents or records or any similar unethical practices in order to gain competitive advantage.
- Suppliers must comply with all local laws and regulations.
- Suppliers must comply with environmental legislation, in particular, using raw materials from sustainable sources and avoid pollution of water ways or the atmosphere.

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ANNUAL CERTIFICATION OF COMPLIANCE WITH THIS POLICY

Belfield will require an annual certification of compliance with this Policy.

Your acceptance and compliance with this Policy applies equally to any down-stream suppliers within your supply chain and any sub-contracted operation or process involved in your supply of goods or services to Belfield.

Should you be unwilling or unable to provide the annual certification, we reserve the right to either cease trading and/or terminate our contract of services/goods with you.

Please sign and return the below certification to Belfield to (Position) by the stated date.

I, **John Longbottom** _____

On behalf of The John Cotton Group Limited _____

Confirm that we will comply with the Belfield's Ethical Trading Policy and certify that all of the goods and services supplied by us to Belfield, comply with laws regarding human trafficking and modern slavery in the country in which we do business.

We agree that should any non-compliance issues be raised during regular audits and inspections, we will with the co-operation of Belfield, formulate a corrective action plan with an agreed timeframe for actions to be rectified.

Signature: John M Longbottom _____

Position: Group Compliance Manager _____

Date: 15th August 2023 _____

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