



## Ethical Trading Policy

At John Cotton Group Limited (JCG) we believe strongly in ethical principles and good stewardship.

The Group recognises that its ethical, social performance and reputation is a part of our overall commercial success. We can therefore proudly pledge to guarantee that we trade according to the following Ethical Trading Criteria.

The John Cotton Group Limited Commitment to its Suppliers, Service Providers and Customers

### **Employees**

JCG is committed to ensuring that our employment practices and the enforcement of corporate regulations ensure the protection of the rights of all those who work for us. In many areas we aim to operate above the minimum standards required by law to ensure our employees are safe, rewarded and valued.

### **Customers**

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

### **Suppliers**

JCG is committed to monitoring social standards in our supply chain, and we expect our suppliers to operate to the same ethical standards we employ ourselves. We also expect all our suppliers to affirm in writing to us that their businesses are also built on these ethical principles.

### **The John Cotton Group Limited Ethical Trading Code of Practice.**

These Trading Principles apply to:

- Staff directly employed by JCG on temporary or permanent contracts.
- Staff employed or provided by contractors or employment agencies to work on JCG premises or to undertake work for or on behalf of JCG.
  - All employment is freely chosen.
  - Working conditions are safe and hygienic.
  - Staff have unrestricted access to toilet facilities and drinking water.
  - Freedom of association and the right to collective bargaining are respected.
  - 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.
  - No discrimination is practiced 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.
  - No bribery or corruption, blackmailing or bullying is permitted.
  - No child labour shall be used.
  - Children or persons under 16 are not employed at any time, day or night,
  - Children or persons under 18 are not employed full time.
  - Staff receive regular health & safety training.
  - JCG takes adequate measures to prevent accidents and minimise potential hazards.
  - JCG has a public Health & Safety Policy.
  - Staff are not required to lodge deposits or identity papers with us.
  - Staff are free to leave JCG after reasonable notice.

- Only employees with a legal right to work in the country are employed.
- 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 will not be required to work extreme hours of work without adequate rest periods.
- Staff are not forced to work in excess of 48 hours per week, a voluntary opt out arrangement is available for those wishing to work in excess of 48 hours per week.
- Overtime is voluntary and is not used to replace regular employment and is compensated at a premium rate.
- 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 payslips detailing lawful deductions are provided for each pay period.
- Labour only contracted, subcontracted and fixed term contracts are not used as a means to avoid obligations under labour and social security laws.
- Opportunities for personal and career development are equally available to all employees.

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

JCG is keen to learn from others and would ask if anyone has any ideas or feedback regarding our policy or practice to contact us.



Name & Position: Nicholas Manning, Group Chief Executive Officer

Dated: 03rd February 2026

GROUP