

Ethical Trading Policy

Purpose: - Pelican Engineering Group is committed to ensuring that all products and materials are sourced in a responsible and ethical manner. This policy sets out the minimum standards expected of Pelican Engineering and its suppliers to ensure that workers involved in the supply chain are treated fairly, work in safe conditions, and have their human rights respected.

Scope: - This policy applies to:

- Pelican Engineering Group
- All approved suppliers
- Agents, subcontractors, labour providers, and consultants involved directly or indirectly in the provision of goods or services to Pelican Engineering

Pelican Engineering will not knowingly encourage or support practices that conflict with this policy, applicable legislation, or recognised international frameworks, including the Ethical Trading Initiative [Ethical Trading Initiative \(ETI\) - GOV.UK \(www.gov.uk\)](http://www.gov.uk) (ETI) Base Code, relevant International Labour Organisation (ILO) conventions, and the UK Modern Slavery Act 2015.

Policy Statement: - Pelican Engineering builds long-term, mutually trusting relationships with suppliers to promote accountability and transparency in labour practices. We are committed to sourcing materials and products only from suppliers who demonstrate ethical practices and compliance with applicable legal and international standards.

Pelican Engineering will not knowingly encourage or support practices that conflict with this policy, our internal standards, or recognised international frameworks, including the Ethical Trading Initiative (ETI) Base Code and relevant International Labour Organisation (ILO) conventions.

Transparency: - Pelican Engineering will strive to be open, honest, and transparent in all dealings with suppliers and stakeholders. Reporting related to ethical trading practices shall be fair, accurate, and not misleading.

Supplier Compliance Requirements: - Suppliers must comply with:

- All applicable national and international laws and regulations
- This Ethical Trading Policy
- Relevant codes, standards, and recognised international guidance

Suppliers are responsible for ensuring that their own suppliers, agents, subcontractors, and consultants comply with the requirements of this policy where they are involved in supplying goods or services to Pelican Engineering.

Ethical Trading Code

Modern Slavery and Human Trafficking: - Pelican Engineering has a zero-tolerance approach to modern slavery, forced labour, and human trafficking. Suppliers must comply with the UK Modern Slavery Act 2015 and all applicable legislation relating to slavery and human trafficking in the countries in which they operate.

Employment Is Freely Chosen: - There shall be no new recruitment of child labour. Where child labour is identified, suppliers shall support remediation programmes that enable children to access education until they are no longer of compulsory school age. Workers under the age of 18 shall not be employed at night or in hazardous conditions. All practices must comply with applicable legal requirements and ILO standards.

Health, Safety and Wellbeing: - A safe and hygienic working environment shall be provided. Reasonable steps shall be taken to prevent accidents and injury arising from workplace hazards. Workers shall receive regular and documented health and safety training. Access to clean toilet facilities, potable drinking water, and food storage facilities shall be provided where appropriate. Any accommodation provided shall be clean, safe, and meet basic worker needs. Responsibility for health and safety shall be assigned to a senior management representative.

Freedom of association and the right to collective bargaining respected: - Workers have the right to join or form trade unions of their own choosing and to bargain collectively. The employer adopts an open attitude towards the activities of trade unions and their organisational activities. Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace. Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates and does not hinder the development of parallel means for independent and free association.

Regular Employment: - Employment shall be based on recognised employment relationships in accordance with national law and practice. Labour-only contracting, excessive use of fixed-term contracts, or sham apprenticeship schemes shall not be used to avoid legal obligations. All workers must have a legal right to work in the country of employment. Original right-to-work documentation must be verified and returned to workers.

Labour Providers: - Labour providers shall supply only workers registered with them. Relationships with labour providers shall be governed by a Service Level Agreement compliant with national legislation. Labour providers shall be independently audited on a regular basis.

Fair Wages and Benefits: - Wages and benefits shall meet at least national legal standards or industry benchmark standards, whichever is higher. Wages shall be sufficient to meet basic needs and provide some discretionary income. Workers shall receive clear, written

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information about wages and employment conditions. Wage deductions as a disciplinary measure are prohibited unless permitted by law and agreed by the worker. All disciplinary measures shall be recorded.

Lawful Working Hours: - Working hours must comply with national laws, collective agreements, and the provisions of below, whichever affords the greater protection for workers are based on international labour standards: -

- Working hours shall comply with national laws and international labour standards.
- Normal working hours shall not exceed 48 hours per week, excluding overtime.
- Overtime shall be voluntary and compensated at a premium rate, recommended to be not less than 125% of the normal rate.
- Total working hours shall not exceed 60 hours in any seven-day period, except in exceptional and lawful circumstances.
- Workers shall be provided with at least one day off in every seven-day period, or two days in every fourteen-day period where permitted by law.

No Discrimination: - There shall be no discrimination in employment practices based on race, caste, nationality, religion, age, disability, gender, marital status, sexual orientation, union membership, or political affiliation.

Fair Treatment of Employees: - Physical abuse, threats, sexual or other harassment, verbal abuse, or intimidation are strictly prohibited.

Non-Compliance: - Pelican Engineering reserves the right to require corrective actions where non-compliance with this policy is identified. Serious or persistent breaches may result in suspension or termination of the supplier relationship.

Review and Continuous Improvement: - This policy will be reviewed periodically to ensure continued relevance, legal compliance, and alignment with recognised ethical trading standards.