



# Ethical Trading Policy

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## Introduction

At Primenet Limited we strongly believe in ethical principles and good stewardship.

Where possible we trade according to 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.

## 1. Our Full Ethical Trade Policy Statement Policy Statement

Primenet Limited recognises that our commercial activities have potential to impact on our suppliers and our locality

As a socially responsible small business our suppliers, local community and customers have the right to expect:

- a. Products sourced by Primenet are produced under working conditions that are hygienic and safe.
- b. All workers involved in the delivery of services provided by Primenet are treated with full consideration to their basic human rights.
- c. Primenet acts in an ethical manner above and beyond basic legal requirements.
- d. Primenet is committed to implementing the principles of the Ethical Trading Initiative Base Code (although we are not members of the ETI)
- e. The Kenton Group's commitment to its suppliers, service providers and customers.
- f. Primenet recognises that our ethical and social performance and reputation is a key part of our overall commercial success.

### Employees

Primenet 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. As we of course expand and become larger we will be able to offer more opportunities for our staff. We establish recognised relationships with our employees in accordance with existing legislation in UK and Germany or in any Country where we are obtaining products or sub-contracting. All employees are provided with an easy to read, formal contract of employment with clarity in relation to wages. In the case where an employee is unable to read, the contract of employment will be read and explained to them by a appropriate third party.

### Customers

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

### Suppliers

Primenet is committed to monitoring social standards in our supply chain and we encourage our suppliers to operate the same ethical standards we employ ourselves.

## 2. Primenet Ethical Trading Code of Practice

This code of practice applies to:

- a. Staff directly employed by Primenet on temporary or permanent contracts.
- b. Staff employed or provided by contractors or employment agencies to work on the Primenet's premises or to undertake work on behalf of Primenet.
- c. No forced, bonded or involuntary labour shall be used.
- d. All employment with Primenet is freely chosen.
- e. Staff are not required to lodge deposits or identity papers with us
- f. Staff are free to leave Primenet after serving reasonable notice as set out in their contract of employment.

## 3. Child Labour

- a. In principle Primenet is against the use of child labour and believes its long-term elimination is ultimately in the best interests of children. However, the elimination of child labour must always be undertaken in a manner consistent with the best interests of the children concerned. Procurement and supply management professionals will ensure that their organisation's supplier comply with the following:  
in this context "child" refers to any persons less than 15 years of age, unless local legislation on the minimum age stipulates a higher age for work or mandatory schooling in which case the higher age shall apply
- b. Young person refers to any worker over the age of a child, as defined above, under the age of 18.
- c. We will develop or participate in and contribute to a policies and programmes which provide for the transition of any exiting worker found to be a child performing child labour to enable her or him to attend and remain in quality education until on longer a child
- d. Any supplier to Primenet who employ children and young persons at night in accordance with the ILO Conventions C70 Night Work of Young Persons ((Non-Industrial Occupations) Convention. 1946)) and C90 Night Work of Young Persons ((Industry) Convention (Revised), 1948)).
- e. Primenet will not employ children or young persons under 18 in hazardous conditions.
- f. In any event the course of action taken shall be in the best interest of the child, conform to the provisions of ILO C138 Minimum Age Convention (1973) and be consistent with the United Nation's Convention of the Rights of the Child.

## 4. Working conditions are safe and hygienic

- a. A senior member of staff is assigned responsibility for Health and Safety within the Company.
- b. Primenet takes adequate measures to prevent accidents and minimise potential hazards
- c. Staff receive regular health and safety training and have access to the Health and Safety Policy
- d. The nominated management representative regularly monitors compliance with the Health and Safety Policy.
- e. Appropriate PPE is provided to all employees who require them at no cost to the individual.
- f. Staff have unrestricted access to welfare, toilet facilities and drinking water and are entitled to regular breaks.
- g. Primenet has a published Health & Safety Policy.

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

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

## 6. There is No Discrimination Practiced.

- a. 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 or political affiliation.
- b. Opportunities for personal and career development are equally available to all employees.
- c. 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 proved.

## 7. Employment Agencies

Employment agencies contracted to supply temporary staff shall demonstrate commitment to and application of the requirements of this code and shall ensure that all staff supplied to Primenet are eligible to work in the UK by:

- a. Following Immigration and Nationality Directorate Guidelines on the current Asylum and Immigration Act
- b. Ensuring that the requirements of the current Immigration and Asylum Act 1999
- c. Retaining copies of identity papers, work permits, or passport stamps as detailed in the Home Office List of Specified Documents and UK Passport Stamps.

## 8. Responsibility

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