Ethical Trading Policy

As a company Detectamet Ltd adopts to support and incorporate the code of the Ethical Trading Initiative.

“We intend that our suppliers meet agreed standards for the implementation of codes of labour practice with performance measured, transparent and, ultimately, a precondition to further business with our company. Our Ethical Trading Policy seeks to make substantial improvements in the lives of poor working people around the world by developing, and encouraging the use of, a set of standards in trade. These are: the free choice of employment, freedom of association and the right to collective bargaining, safe and hygienic working conditions, child labour, a living wage, working hours, non-discrimination, the provision of regular employment and the absence of harsh or inhumane treatment.”

Our Code of Conduct applies to ourselves and all suppliers that produce goods or services for Detectamet Ltd or any of its subsidiaries, affiliates, divisions or agents (Detectamet Ltd). Although suppliers to Detectamet Ltd are from many different countries, nationalities and cultures, the Supplier Code of Conduct represents Detectamet Ltd’s commitment to source goods and services only from persons and firms that achieve internationally recognized standards and practices in dealing with their workers and their working environment. Ourselves and all Suppliers to Detectamet currently meet and will continue to meet, so long as they act as a Supplier to Detectamet Ltd, each of the following standards:

Prohibition of Forced Labour  No prison, indentured or forced labour of any kind is used by the Supplier. Foreign workers hired by the Supplier are not required to remain in employment at any time against their will.

Prohibition of Child Labour  No person below the age of 16 is employed by the Supplier. If the local legal minimum age for work is higher than 16, the Supplier employs no one younger than the legal minimum age.

Compliance with Local Law  The Supplier will comply with all laws and regulations to which it is subject, including those applicable to the environment.

Working Hours  The Supplier will insure that employee working hours are in compliance with local law, but in no event shall an employee be required to work more than sixty (60) hours per week, or more than six (6) days during any seven (7) day period. All employees of
the Supplier shall be free to refuse to work any requested overtime without threat of termination, punishment or penalty.

**Wages and Benefits**  All employees of the Supplier shall receive the greater of the legal minimum wage and benefits or the prevailing wage and benefits in the industry, with a written accounting given to the Employee during each pay period clearly indicating the employee’s compensation and indicating any deductions from the employee’s pay. Supplier agrees to pay higher hourly rates for late shifts than for normal shifts. The supplier may not deduct penalties for disciplinary infractions from employee wages.

**Non-Discrimination**  The Supplier will make hiring decisions solely on the basis of the employee’s qualifications to perform the specific job. The Supplier must not make any decisions relating to hiring, salary, benefits, advancement, discipline, termination or advancement on the basis of the employee or potential employee’s race, colour, gender, nationality, religion, age, maternity or marital status.

**Working Environment**  The Supplier must maintain a working environment in its facilities which is safe and healthy, and at all times in full compliance with all applicable laws and regulations relating to working conditions.

**Inspection Right**  Ourselves and the Supplier shall maintain reasonable records and documentation of its compliance with this Code of Conduct, and shall permit representatives of Detectamet Ltd/connected 3rd parties to inspect with all such records and documentation, and the facilities of the Supplier, to independently confirm compliance with this Code of Conduct.

We are taking the first steps towards building a credible ethical trade strategy for our company, and our policy will be to implement the Seven “C”s of ethical trading and we believe that everyone should be working as a TEAM - Together Everyone Achieves More

The seven “C’s” of ethical trading we implement are:

- **Commitment.** To demonstrate that we are paying more than lip service to ethical trade. How much money we spend on ethical trade and how many staff work on it are key signs of real commitment. We will dedicate 2 members of staff to this project and keep records of all our visits and expenditure.
- **Checks in place.** Knowing what’s happening on the ground is a key step for our company, towards behaving responsibly. If we don’t know what and where the problems are, how will we be able to fix them? We must have a credible system for assessing workers’ conditions.
- **We visit all suppliers on an annual basis in the UK and other.**
- **Corrective action.** It’s not enough to simply find out where the problems are. We will need to agree with our suppliers what improvements to workers’ conditions are necessary and when they should be made, and work out how we are going to make sure agreed
improvements happen. We will monitor all suppliers and all must complete survey and audit on an annual basis.

**Capacity building.** Staff and suppliers need adequate training and support. By implementing this policy we can now build this into our training programmes.

**Core business.** Integrating ethical trade policies into core business decisions - like the prices paid to suppliers, and the lead times given to them to complete orders - is key to achieving widespread change for workers. This is one of the biggest challenges of ethical trade.

**Communication.** We will spend a lot of time persuading staff and suppliers why ethical trade is so important. It’s also important to think about how to report publicly about what we are doing.

**Collaboration.** The only way to really make a difference is by working with other companies, as well as with organisations that either represent and/or have specialised knowledge of workers’ issues, such as trade unions and charities for example.

We constantly strive to put this into practice.

When we have built a credible monitoring system we need to look at how we can support our suppliers to make workplace improvements and to start integrating ethical trade into their core business practices.

**Know our suppliers.** Cut out the middle man and where possible, develop long-term, direct relationships with our suppliers. This will help us build the trust and leverage we need to help make sustained improvements to workers’ conditions.

**Incentivise our suppliers.** Make sure compliance with labour standards is built into our contracts with suppliers, so they know you mean business. Reward them for their efforts by giving repeat orders.

‘Think worker’. Think about the impact of our decisions on workers, and make sure we include ethical criteria alongside cost and quality when selecting suppliers.

**Improve production planning.** Give suppliers clear and predictable lead times, making it easier for them to ensure their employees work reasonable hours.

**Look at the price we pay our suppliers.** At the very least, make sure that it allows our suppliers to pay their workers a wage that they can afford to live on.

We acknowledge that this is an ongoing policy with continuous improvements needing to be recognised our commitments and those we ask of our suppliers are as follows: