

Ethics Policy & Ethical Trading Initiative (ETI)

We seek to follow the Ethical Trading Initiative (ETI) base code which summarises the labour standards towards which we aim to hold ourselves and our suppliers accountable.

1. Purpose

- 1.1 GI Solutions Group (“the Company”) is committed to the practice of responsible corporate behaviour.
- 1.2 Through its business practices the Company seeks to protect and promote the human rights and basic freedoms of all its employees and agents.
- 1.3 Further the Company is committed to protecting the rights of all of those whose work contributes to the success of the Company, including those employees and agents of suppliers to the Company.
- 1.4 The Company is also committed to eliminating bribery and corruption. It is essential that all employees and persons associated with the Company adhere to this policy and abstain from giving or receiving bribes of any form.
- 1.5 This policy is non-exhaustive, and all aspects of the Company’s business should be considered in the spirit of this policy.

2. Human Rights

- 2.1 The Company is vehemently opposed to the use of slavery in all forms; cruel, inhuman or degrading punishments; and any attempt to control or reduce freedom of thought, conscience and religion.

Employment is freely chosen

- 2.2 There is no forced, bonded or involuntary prison labour.
- 2.3 Workers are not required to lodge “deposits” or their identity papers with their employer and are free to leave their employer after reasonable notice.
- 2.4 The Company will ensure that all of its employees, agents and contractors are entitled to their human rights as set out in the Universal Declaration of Human Rights and the Human Rights Act 1998.
- 2.5 The Company will not enter into any business arrangement with any person, company or organisation which fails to uphold the human rights of its workers or who breach the human rights of those affected by the organisation’s activities.

Regular employment is provided

- 2.6 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice. Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, subcontracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

3. Freedom of association and the right to collective bargaining are respected.

- 3.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- 3.2 The employer adopts an open attitude towards the activities of trade unions and their
- 3.3 Organisational activities.
- 3.4 Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- 3.5 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 and bargaining.

4. Working conditions are safe and hygienic

- 4.1 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.
- 4.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- 4.3 Access to clean toilet facilities and to drinkable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 4.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- 4.5 The company observing the code shall assign responsibility for health and safety to a senior management representative.

5. Child labour shall not be used

- 5.1 There shall be no new recruitment of child labour.
- 5.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; "child" and "child labour" being defined in the appendices.
- 5.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- 5.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards. (International Labour Organisation)

6. Regular employment is provided

- 6.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice. Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

7. Workers' Rights

- 7.1 The Company is committed to complying with all relevant employment legislation and regulations. The Company regards such regulations and legislation as the minimum rather than the recommended standard.

8. No harsh or inhumane treatment is allowed.

- 8.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
- 8.2 No worker should be discriminated against on the basis of age, sex, race, sexual orientation, religion or beliefs, gender reassignment, marital status or pregnancy. All workers should be treated equally. Workers with the same experience and qualifications should receive equal pay for equal work.

9. No discrimination is practised

- 9.1 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.
- 9.2 No worker should be prevented from joining or forming a staff association or trade union, nor should any worker suffer any detriment as a result of joining, or failing to join, any such organisation.
- 9.3 Workers should be aware of the terms and conditions of their employment or engagement from the outset. In particular workers must be made aware of the wage that they receive, when and how it is to be paid, the hours that they must work and any legal limit which exists for their protection and any overtime provisions. Workers should also be allowed such annual leave, sick leave, maternity / paternity leave and such other leave as is granted by legislation as a minimum.
- 9.4 The Company does not accept any corporal punishment, harassment in any form, or bullying in any form.

10. Living wages are paid

- 10.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher.
- 10.2 In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- 10.3 All workers shall be provided with written and understandable Information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- 10.4 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

11. Working hours are not excessive

- 11.1 Working hours comply with national laws and benchmark industry standards, whichever affords greater protection.
- 11.2 In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7 day period on average. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

12. Environmental Issues

- 12.1 The Company is committed to keeping the environmental impact of its activities to a minimum and has established an Environmental Policy in order help achieve this aim. Copies of the Environmental Policy are available Safety Health & Environment Coordinator
- 12.2 As an absolute minimum, the Company will ensure that it meets all applicable environmental laws in whichever jurisdiction it may be operating.

13. Conflicts of Interest

- 13.1 The Company holds as fundamental to its success the trust and confidence of those with whom it deals, including clients, suppliers and employees. Conflicts of interest potentially undermine the relationship of the Company with its partners.
- 13.2 In order to help preserve and strengthen these relationships the Company has developed an Anti-Bribery Policy, which provide rules and guidelines concerning the conduct of its officers and employees aimed at minimising the possibility of conflicts of interest and at avoiding risks associated with bribery and corruption. Copies of the Anti-Bribery Policy are available from HR Manager or Financial Director.
- 13.3 All officers, employees and representatives of the Company are expected to act honestly and within

the law.

14. Information and Confidentiality

- 14.1 Information received by employees, contractors or agents of the Company will not be used for any personal gain, nor will it be used for any purpose beyond that for which it was given.
- 14.2 The Company will at all times ensure that it complies with all applicable requirements of data protection legislation (including, but not limited to, the Data Protection Act 1998) in force from time to time.

15. Bribery and Corruption

- 15.1 The Company is fundamentally opposed to any acts of bribery and to the making of facilitation payments as defined by the Bribery Act 2010.
- 15.2 Employees and any other persons associated with the Company such as agents, subsidiaries and business partners are not permitted to either offer or receive any type of bribe and/or facilitation payment.
- 15.3 All employees are encouraged to report any suspicion of corruption or bribery within the Company in accordance with the Whistleblowing Policy available from HR Manager or Financial Director.
- 15.4 Should any employee or associated person be in doubt when receiving or issuing gifts and hospitality, he/she must refer to the Gift and Hospitality Policy available from HR Manager or Financial Director.
- 15.5 The Company uses its reasonable endeavours to implement the guidance principles on bribery management that are published, from time to time, by Secretary of State in accordance with Section 9 of the Bribery Act 2010.
- 15.6 If an employee or associated person is found guilty of giving or receiving a bribe, he/she will be personally criminally liable and may be subject to disciplinary action.
- 15.7 Anyone found guilty of bribery, will be responsible for bearing any related remedial costs such as losses, court fees or expenses.

This policy has been approved & authorised by:

Name: Maria Ion
Position: Human Resources Manager
Date: 19 October 2016

Signature:

