

AMTICO INTERNATIONAL ETHICAL BUSINESS POLICY

POLICY STATEMENT

Amtico International has developed a code of practice outline based on the Ethical Trading Initiative (ETI) Standard, to ensure that all colleagues, customers and clients are treated fairly, honestly, and with respect for their basic human rights and dignity.

CODE OF PRACTICE

1. Employment is freely chosen

- 1.1 There is no forced, bonded or involuntary prison labour. All colleagues have the choice of employment.
- 1.2 Colleagues are not required to lodge deposits or their identity papers with their employer and are free to leave their employer after a reasonable period of notice, which is stated at the time of employment.
- 1.3 Amtico International employs only workers who are legally entitled to be working within the U.K. This is checked at the time of employment, documentary evidence is collected at the time of induction and stored on colleagues' personal files.

2. Freedom of Association and the right to collective bargaining

- 2.1 Colleagues, without exception, have the right to join or form trade unions of their own choosing and to bargain collectively. Amtico International recognises the Unite union for the purposes of collective bargaining.
- 2.2 Amtico International adopts an open attitude towards the activities of trade unions and their organisational activities.
- 2.3 Shop stewards are not discriminated against and have access to carry out their representative functions in the workplace.

3. Health, Safety and Environmental Issues

- 3.1 Amtico International believes in acting with care and responsibility in matters of health, safety and environmental protection. For further information, refer to Amtico International's Health, Safety and Environmental Policy.

4. The Employment of Children

- 4.1 The employment of children is prohibited. Where Amtico International does employ any person aged 16 or 17 this will not be in a manufacturing, production, or logistics role other than the exception of some young people on recognised training schemes or apprenticeships. Amtico supports formal work-based training apprenticeship programs that enable young workers to learn new skills. These programs will be aimed at developing 'Young Workers' skill and experience. All apprenticeships will be properly registered and supervised. Where persons

aged 16 or 17 are employed, it will be in an office environment and the appropriate regulations will be adhered to as a minimum standard.

4.2 Young people under the age of eighteen shall not be employed at night or in hazardous conditions.

4.3 Young workers will be paid at least the minimum wage for every hour worked including any training time.

5. Wages

5.1 Amtico International pays wages that are at least comparable with locally benchmarked industry norms and are above that of the National Minimum Wage paying the Real Living Wage as a minimum.

5.2 All employees are 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.

5.3 Deductions from colleague's wages as a disciplinary measure is not permitted nor are any deductions from wages not provided for by national law without the expressed permission of the colleague concerned.

6. Working hours

6.1 Working hours of employees at Amtico International comply with national laws and industry benchmark standards, whichever offers greater protection.

6.2 In any event, colleagues are not, on a regular basis, required to work in excess of 48 hours per week and are provided with at least one day off for every 7-day period on average. Overtime is voluntary, should not exceed 12 hours per week unless there are exceptional and specific reasons for doing so, is not demanding on a regular basis, and is always compensated at a premium rate.

7. Equal opportunities

7.1 Amtico International employs a policy where there is no discrimination in hiring, compensation, access to training, promotion, termination, or retirement based on ethnicity, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation. Refer to Amtico International's Equal Opportunity Policy for additional information.

7.2 Maternity, Adoption and Paternity rights are upheld in accordance with current national legislation. Refer to Amtico International's Maternity, Adoption Paternity and Shared Paternity Policies for additional information.

8. Regular and Secure Employment

8.1 All employment at Amtico International is through a recognised employment relationship as established through national law and practice.

8.2 Obligations to colleagues under labour or social security laws and regulations arising from the regular employment relationship will 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 will any such obligations be avoided through the excessive use of fixed-term contracts of employment.

9. Treatment of Employees

9.1 All colleagues are treated with respect. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation are prohibited. Refer to Amtico International's "Dignity at Work Policy for additional information.

10. Employment Agencies

10.1 Wherever employment agencies are used their colleagues are treated exactly the same as any other Amtico International colleague.

10.2 Employment agencies only supply workers registered with them.

10.3 Employment agencies are regularly audited to ensure their compliance with this policy.

11. Disclosure

11.1 Amtico International is willing to disclose all facts concerning production to suppliers.

11.2 Amtico International employs an open-door policy and allows customers to inspect its manufacturing units producing that customer's products without prior notice.

12. Distributors, Agents, Suppliers & Customers

12.1 Amtico International expects its Distributors, Agents, Suppliers and Customers to operate to the standards set out in this policy. Amtico International will not knowingly conduct business through any Distributor, Agent, Supplier or Customer who conducts business in a manner which is inconsistent with the terms of this policy or who engages in any practice which could be construed as contravening laws such as the UK Bribery Act 2010, the US Foreign Corrupt Practices Act 1977 or Criminal Finances Act 2017.

Further information regarding Amtico's ethical business practices and how to report concerns can be found on its website via the following policies:

- Modern Slavery
- Bribery Act
- Child Labour, Remediation & Young Worker
- Freedom of Association & Collective Bargaining
- Human Rights
- Whistleblowing

