

Sustainability Policy  <b>Ethical Trading</b>	WCL:	3
	Issue:	2.0
	Written By:	Tony Bailey
	Issue Date:	November 2024

## 1 Scope

- 1.1 This policy outlines Waterside Colour’s commitment to ethical trading, supporting and incorporating the code of the ethical trading initiative.
- 1.2 “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.”
- 1.3 This policy applies to Waterside Colours, all of its suppliers that produce goods or services, subsidiaries, affiliates, divisions, or agents. Although suppliers to Waterside Colours originate from various countries, the supplier code of conduct represents our commitment to source from sources that achieve internationally recognized standards and practices in dealing with their workers and their working environment.

## 2 Responsibility

- 2.1 Overall control of the policy is the responsibility of the HSE Coordinator
- 2.2 Overall responsibility for compliance is with the General Manager.

## 3 Related documents

QEMP:	Title:	Issue:
WCL 1	Staff Handbook 2023	January 2023
WCL 2	Employee code of conduct	July 2023
WCL 3	Ethical Trading Policy	April 2023
WCL 4	Modern Slavery & Human Trafficking Policy	October 2023
WCL 4.1	Anti-Slavery Statement	October 2023
WCL 5	Whistleblower Policy	October 2023

## 4 Procedure

- 4.1 Waterside Colours and its suppliers will adhere to each of the following standards:
- 4.2 **Prohibition of Forced Labour**
- 4.2.1 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.
- 4.3 **Prohibition of Child Labour**

- 4.3.1 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.
- 4.4 **Compliance to local laws**
- 4.4.1 The Supplier will comply with all laws and regulations to which it is subject, including those applicable to the environment.
- 4.5 **Working Hours**
- 4.5.1 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.
- 4.6 **Wages & Benefits**
- 4.6.1 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.
- 4.7 **Non-Discrimination**
- 4.7.1 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.
- 4.8 **Working Environment**
- 4.8.1 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.
- 4.9 **Inspection rights**
- 4.9.1 Waterside Colours and the Supplier shall maintain reasonable records and documentation of its compliance with this Code of Conduct, and shall permit representatives of Waterside Colours /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.

## 5 Policy Approval

<b>Signed &amp; Approved By:</b>	<i>Brian Acklam</i>
<b>Printed:</b>	Brian Acklam
<b>Role:</b>	General Manager
<b>Date:</b>	05/11/2024

**6 Document Control**

<b>Issue Number</b>	<b>Issue Date</b>	<b>Reason for change</b>
1.0	08/08/2024	Start of document
2.0	05/11/2024	Reviewed & updated document format