



ETHICAL TRADE SYSTEM (ETI BASE CODE)

BlueSky Solutions UK Ltd are proud to support the Ethical Trading Initiative and as such we strive to ensure ethical practice throughout our business and supply chains. This document is based on the ETI's Base Code which is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice.

We aim to trade only with suppliers who commit to the ETI Base Code. **Please sign & date the end of this agreement to demonstrate your company's commitment to achieving the Code.**

1. EMPLOYMENT IS FREELY CHOSEN

- 1.1 There is no forced, bonded, or involuntary prison labour.
- 1.2 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. FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING ARE RESPECTED

- 2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- 2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
- 2.3 Worker's representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- 2.4 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.

3. WORKING CONDITIONS ARE SAFE AND HYGIENIC

- 3.1 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.
- 3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- 3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- 3.5 The company observing this Code shall assign responsibility for health and safety to a senior management representative.

4. CHILD LABOUR SHALL NOT BE USED

- 4.1 There shall be no new recruitment of child labour.
- 4.2 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, downloadable here: <https://www.ethicaltrade.org/resources/eti-base-code>.
- 4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- 4.4 These policies and procedures shall conform to the provisions of the relevant ILO standards.

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5. LIVING WAGES

- 5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- 5.2 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.
- 5.3 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.

6. WORKING HOURS

- 6.1 Working hours must comply with national laws, collective agreements, and the provisions of clause 6.2 to clause 6.6 below, whichever affords the greater protection for workers. Clause 6.2 to clause 6.6 are based on international labour standards. *International standards recommend the progressive reduction of normal hours of work, when appropriate to 40 hours per week, without any reduction in workers' wages as hours are reduced.*
- 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week, save where permitted in accordance with applicable law.
- 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, considering all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment.
- 6.4 The total hours worked in any seven-day period shall not exceed 60 hours, except where covered by clause 6.5 below.
- 6.5 Working hours may exceed 60 hours in any seven-day period only in exceptional circumstances where all of the following are met:
 - 6.5.1 this is allowed by national law.
 - 6.5.2 this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce.
 - 6.5.3 appropriate safeguards are taken to protect the workers' health and safety; and
 - 6.5.4 the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents, or emergencies.
- 6.6 Workers shall be provided with at least one day off in every seven-day period or, where allowed by national law, two days off in every 14-day period.

7. NO DISCRIMINATION IS PRACTICED

- 7.1 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.

8. REGULAR EMPLOYMENT IS PROVIDED

- 8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
- 8.2 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.

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9. PROHIBITION ON HARSH OR INHUMANE TREATMENT

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

The following provisions are in addition to the Base Code:

10. THIRD PARTY LABOUR AGENCIES

10.1 Relationships with labour agencies shall be covered by contracts and Service Level Agreements which meet national legal requirements and the requirements of this Code.

10.2 Labour agencies should be audited on a regular basis to ensure compliance with this Code and national legal requirements.

11. SMALLHOLDERS

11.1 Where smallholders exist in the supply chain, suppliers will contract with them responsibly, ensuring that smallholders' basic incomes are met.

11.2 Suppliers shall work with smallholders to ensure they meet the relevant requirements of this Code.

12. GENDER

12.1 Suppliers shall promote education, training and professional development for women and implement enterprise development, supply chain and marketing practices that empower female smallholders.

12.2 Suppliers shall measure and publicly report on progress to achieve gender equality.

The provisions of this ETI Base Code constitute minimum standards, and this Code should not be used to prevent companies from exceeding these standards. Companies applying this ETI Base Code are expected to comply with national and other applicable law and where the provisions of law and this ETI Base Code address the same subject, to apply that provision which affords the greater protection.

The ETI Base Code, downloadable from <https://www.ethicaltrade.org/resources/eti-base-code>, is available for all employees.



**Russell T. Wade
Managing Director**

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