

### **Ethical Trade Policy**

### **Employment is freely chosen**

Walker's Shortbread Ltd. ensures that there is no forced, bonded or involuntary labour and that workers are not required to lodge 'deposits' or their identity papers. All staff are free to leave employment after the stated amount of notice given in the main terms of employment.

Freedom of Association and the right to collective bargaining are respected Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively. Workers representatives have access to carry out their

representative functions in the workplace.

### Working Conditions are safe and hygienic

Walker's Shortbread Ltd has devised and implemented a health and safety policy, which details responsibilities at all, levels in the Company.

Walker's Shortbread Ltd ensures that adequate measures are taken to prevent accidents and protect the health, safety and welfare of all employees and visitors to the site. Walkers Shortbread Ltd. ensures that all staff receive the appropriate instruction and training.

All employees have access to clean toilet facilities and to potable water, and where appropriate sanitary facilities for food storage are provided

#### **Child Labour**

There shall be no recruitment of child labour (only persons of age 16 or over are employed). Young persons under the age of 18 are not employed at night or required to undertake hazardous activities.

# Living wages are paid

Walker's Shortbread Ltd ensures that all employees are paid at rates, which comply with all national legal standards.

All employees are issued with a contract stating their main terms of employment, which details all information such as pay, working hours, holiday entitlement, grievance and disciplinary procedures and notice of termination of employment by either party.

All employees are issued with a pay statement for each period, which details all lawful deductions (tax and national insurance etc) and any voluntary deductions (eg pensions)

#### Working hours are not excessive

During the Company's quiet season, usually January to April each year, employees are not expected to work more than there contracted hours. Overtime during this period is limited and only approved to cover short term emergency situations and shall not at this time become regular and routine.

During the build up to and throughout peak season May to December, some overtime is likely to be available in order that the Company can maintain the flexibility and quick response capabilities that customers demand and expect.

All employees exercise their rights under the Working Time Regulations 1998 and sign to either limit their hours to maximum of 48 hours in any week or have signed to be exempt from this limit.

In keeping with life work balance good practice the Company recognises the standards set by the Ethical Trading Initiative and limits the maximum hours per week to 60 and the maximum working days per week to 6. These limits to be adhered to at all times of the year and can only be exceeded by approval of the Director to cover short term emergency situations, by voluntary means and may not become regular and routine.

All overtime is voluntary and compensated at a premium rate.

#### No Discrimination is practised

Walker's Shortbread Ltd has an equal opportunities policy in place and there is no discrimination when hiring, paying, training, promoting or for any other purpose on the grounds of race, sex, nationality, religion, age, disability, gender or sex orientation. Opportunities for any personal or career development are equally available to all employees.

# Regular Employment is provided

Walkers Shortbread employment is provided to all employees in line with all national law and practice.

# No harsh or inhumane treatment is allowed

Walker's Shortbread does not tolerate any physical abuse, the threat of physical abuse, sexual or other harassment and verbal abuse or any other forms of intimidation and is clearly referred to in our Company Handbook.

### Organisation

The Directors of Walker's Shortbread Ltd have overall responsibility for all aspects of ethical trading at work.

The HR Team are responsible for producing and communicating procedures, codes and instructions, providing advice and for the monitoring through audit.

Nicky Walker Managing Director