

CSG-HO-HSEQ-PO-3.000 - Ethical Sourcing Responsible Trading Policy

[Awaiting Approval] v6.2

Summary

Objective

This policy outlines our company commitment to Ethical Sourcing and Responsible Trading.

Owner John Varcoe

Expert Kshitija Katkar

Policy

1.0 PURPOSE

- a** This policy outlines our company commitment to Ethical Sourcing and Responsible Trading.

2.0 SCOPE

- a** Cheetham Salt Group

3.0 POLICY

- a** Cheetham Salt Group is committed to sourcing products and conducting business in an ethical and responsible manner, and considering the welfare of workers, health and safety and potential environmental impacts in the countries where we operate.
- b** Our Ethical Sourcing Policy is based primarily on Ethical Trade Initiative (ETI), International Labour Organisation (ILO) Conventions and Modern Slavery Act

3.1 Legal Requirements

- a** Fully comply with all local laws and regulations regarding labour, health, safety and the environment. To fully comply with the legal requirements of the countries in which we operate in addition to all elements of this Ethical Sourcing Policy.

3.2 Forced/ Bonded Labour

- a** Not use Forced, Bonded or Involuntary Labour
- b** Employment must be freely chosen.
- c** Workers must not be required to lodge deposits or identity papers.
- d** Workers must be free to leave their employment after reasonable notice, not more than 1 month, has been given.

4.0 Child Labour

- a** No use of child labour. Child labour is defined as work that deprives children of their childhood, the opportunity to attend school and fulfil their potential, or that is harmful to their physical and mental development.

- b** Being able to verify the age of all employees to ensure no child labour is used. We refer to the International Labour Organisation's Minimum Age Convention, 1973 (No. 138), where the minimum age for work is defined as being below the age for finishing compulsory schooling, and in any case not less than 15 years of age

5.0 Illegal Labour

- a** Will not use illegal labour.
- b** Being able to verify the legal entitlement of our employees to work in the country of employment.

6.0 Harsh or Inhumane Treatment

- a** Prohibit physical abuse or physical discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation.

7.0 Business Integrity

- a** Engage in professional business ethics in all dealings and provide transparent documentation and records.
- b** Bribes, favours, benefits or other similar unlawful or improper payments, in cash or in kind, are strictly prohibited, whether given to obtain business or otherwise.

8.0 Wages and Benefits

- a** Wages and benefits paid for a standard working week must meet as a minimum national or industry standards, whichever is the higher. In any event, wages should always be enough to meet basic needs and to provide some discretionary income.
- b** All workers must 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.
- c** Deductions from wages may only occur with the express written permission of the worker concerned.
- d** Deductions from wages for disciplinary measures are not permitted.

9.0 Working Hours

- a** Including any overtime, workers must not work above the maximum hours per week or per month as stipulated by local laws, or where local laws do not exist, a total of 60 hours per week.
- b** Workers must have at least one day off in 7 days or two days off in every 14 days
- c** Overtime must be voluntary and compensated as prescribed by local laws.
- d** Record keeping on hours worked must be accurate, complete and transparent at all times.

10.0 Freedom of Association

- a We acknowledge that workers have a right to freedom of association and to bargain collectively
- b Workers have a right to join or form trade unions of their choosing. We will adopt an open attitude towards the activities of trade unions and their organization activities.
- c Where the right to freedom of association and collective bargaining is restricted under local laws, we will not hinder the development of alternative means of independent and free association and bargaining

11.0 Sub-Contracting and Supply Chain

- a We will have adequate policies and processes in place for properly managing subcontracting and suppliers, to ensure that they operate in accordance with applicable laws, regulations and our Ethical Sourcing Policy

12.0 Safe Working Conditions

- a Plant and systems of work which are safe and without risk to health will be provided
- b Provide workers with a safe and clean working environment taking into consideration the prevailing knowledge of the industry and of any specific hazards.
- c Workers must receive adequate, recorded training to perform their jobs in a safe manner
- d Personal protective equipment must be supplied and workers trained in its use
- e Safeguards on machinery must meet or exceed local laws
- f Where we provide worker accommodation, it must be clean, safe and meet the basic needs of workers.
- g Workers must have access to clean toilet facilities, clean drinking water and where appropriate sanitary facilities for food storage and preparation.

13.0 Discrimination

- a 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.

14.0 Regular Employment

- a To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
- b Employees who have a regular employment relationship with their employer are afforded a number of obligations from their employer relating to labour and social security laws and regulations. These obligations shall not be avoided through the use of labour- only contracting, sub- contracting, home-working arrangements, fixed term contracts or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment.

15.0 Environment

- a Complying with local and national environmental laws and regulations.
- b Using reasonable endeavors to comply with international standards on environmental protection.
- c Green Procurement: Before purchasing office, supplies and consumables employees should Investigate which products can be substituted with more sustainable, cost-comparable alternatives, such as stationery with high recycled content or locally sourced, organic or Fairtrade produce when available...
- d Minimize energy consumption and carbon footprint by implementing policies and management systems. Adopt efficient technologies to reduce energy use, limit business travel, and decrease resource dependence where applicable. Increase the use of sustainable materials and products while promoting responsible waste recycling and ensuring compliance with hazardous material regulations.

16.0 Documentation and Policies

- a Appropriate documentation is in place to ensure effective ethical management practices.
- b Appropriate policies are developed to ensure effective management of ethical issues.



17.0 Delivering this commitment is the core accountability of the Leadership team within the organization. We engage the full cooperation of all employees, contractors, and suppliers to support and exercise these commitments



Peter Newton
CEO Cheetham Salt Group

 PN CEO Signature.JPG

18.0 Modern Slavery statement

-  Cheetham Salt_Modern Slavery Statement FY2023.pdf
-  Cheetham Salt_Modern Slavery Statement FY2024_v2 (1).pdf

Triggers & Inputs

TRIGGERS

None Noted

INPUTS

None Noted

Outputs & Targets

OUTPUTS

None Noted

PERFORMANCE TARGETS

None Noted

Process Dependencies

PROCESS LINKS FROM THIS PROCESS

None Noted

PROCESS LINKS FROM OTHER PROCESSES

None Noted

RACI

RESPONSIBLE

Roles that perform process activities

ALL STAFF - Cheetham

Systems that perform process activities

None Noted

ACCOUNTABLE

For ensuring that process is effective and improving

Process Owner John Varcoe

Process Expert Kshitija Katkar

Automation Specialists Divya Seshadri

CONSULTED

Those whose opinions are sought

STAKEHOLDERS

None Noted

STAKEHOLDERS FROM LINKED PROCESSES

None Noted

INFORMED

Those notified of changes

All of the above. These parties are informed via dashboard notifications.

Systems

None Noted

Tag

None Noted

Timeframes

			Time	Time
1.0	PURPOSE *	✓	<input type="text" value="-"/>	<input type="text" value="-"/>
2.0	SCOPE *	✓	<input type="text" value="-"/>	<input type="text" value="-"/>
3.0	POLICY *	✓	<input type="text" value="-"/>	<input type="text" value="-"/>
3.1	Legal Requirements *	✓	<input type="text" value="-"/>	<input type="text" value="-"/>
3.2	Forced/ Bonded Labour *	✓	<input type="text" value="-"/>	<input type="text" value="-"/>
4.0	Child Labour *	✓	<input type="text" value="-"/>	<input type="text" value="-"/>
5.0	Illegal Labour *	✓	<input type="text" value="-"/>	<input type="text" value="-"/>
6.0	Harsh or Inhumane Treatment *	✓	<input type="text" value="-"/>	<input type="text" value="-"/>
7.0	Business Integrity *	✓	<input type="text" value="-"/>	<input type="text" value="-"/>
8.0	Wages and Benefits *	✓	<input type="text" value="-"/>	<input type="text" value="-"/>
9.0	Working Hours *	✓	<input type="text" value="-"/>	<input type="text" value="-"/>
10.0	Freedom of Association *	✓	<input type="text" value="-"/>	<input type="text" value="-"/>
11.0	Sub-Contracting and Supply Chain *	✓	<input type="text" value="-"/>	<input type="text" value="-"/>
12.0	Safe Working Conditions *	✓	<input type="text" value="-"/>	<input type="text" value="-"/>
13.0	Discrimination *	✓	<input type="text" value="-"/>	<input type="text" value="-"/>
14.0	Regular Employment *	✓	<input type="text" value="-"/>	<input type="text" value="-"/>
15.0	Environment *	✓	<input type="text" value="-"/>	<input type="text" value="-"/>
16.0	Documentation and Policies *	✓	<input type="text" value="-"/>	<input type="text" value="-"/>
17.0	Delivering this commitment is the core accountability of the Leadership team within the organization. We engage the full cooperation of all employees, contractors, and suppliers to support and exercise these commitments *	✓	<input type="text" value="-"/>	<input type="text" value="-"/>
18.0	Modern Slavery statement *	✓	<input type="text" value="-"/>	<input type="text" value="-"/>
TOTAL			<input type="text" value="-"/>	<input type="text" value="-"/>

Variance Scenarios: