

Ethical Trading Policy

Introduction

Marks Electrical Group plc and its subsidiaries ("the Company") is committed to ethical trading and we aim to ensure the use of appropriate labour standards throughout our supply chain. As a company we promote the abidance of recognised labour laws and standards. The Company wants to ensure that the working conditions of employees in our supply chain meet or exceed these standards. The provisions within this policy constitute minimum and not maximum standards and should not be used to prevent suppliers from exceeding these standards.

The following provisions apply to all our suppliers:

- Employment is freely chosen
- Working conditions are safe and hygienic
- Child labour shall not be used
- National legal living wages are paid
- Working hours are not excessive or forced
- No discrimination is practised
- Regular employment is provided
- Inhumane treatment is prohibited

Employment is freely chosen

- There is no forced, bonded or involuntary prison labour
- Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employment after reasonable notice

Working conditions are safe and hygienic

- A safe and hygienic working environment should be provided. 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.
- Employees shall receive regular and recorded health and safety training and such training be repeated for new workers.
- Access to clean toilet facilities, water and where appropriate food storage facilities should be provided.
- When accommodation is provided, it should be clean, safe, and meet the basic needs of the workers.
- The responsibility of health and safety should be assigned to senior management personnel.

Child labour shall not be used

- There shall be no recruitment of child labour.
- Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- These policies and procedures shall conform to the provisions of the relevant International Labour Organisation (ILO) Standards.

National legal living wages are paid

- Wages and benefits paid for a standard working week meet, at a minimum, national legal standards. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- 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.

- 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.

Working hours are not excessive or forced

- Working hours must comply with Working Time Regulations
- Employees should not be required to work more than 48 hours per week on an average basis and should be provided with at least one day off every seven days.
- Overtime should always be voluntary and should be used responsibly, ensuring the frequency of individuals performing overtime is managed.
- Any employee who wishes may voluntarily opt out of the Working Time Regulations 1998.

No discrimination is practised

- There can be 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.

Regular employment is provided

- To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
- Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship should 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 should any such obligations be avoided through the excessive use of fixed-term contracts of employment.

Inhumane treatment is prohibited

- Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is prohibited.

Involvement with suppliers

- Wherever possible the Company will ensure that its suppliers and the wider supply chain adopt the standards set out in this ethical trading policy.