**Hall & Pickles a division of Hall & Pickles 1812 Limited**

**Ethical Trading Statement**

HALL & PICKLES 1812 Ltd is one of the largest independent steel stockholders in the United Kingdom. We operate an Assured Supplier and Approved Supplier list across our business ensuring that we purchase our steel from Quality assured steel mills and suppliers. The majority of products we purchase to sell are supplied by well-established UK or Western European suppliers in the steel industry.

Hall & Pickles a division of Hall & Pickles 1812 Limited values its reputation for ethical behaviour and for financial integrity and reliability and is committed to maintaining the highest standards of ethics and compliance with all relevant laws whenever we do business.

Hall & Pickles a division of Hall & Pickles 1812 Limited is committed to ensuring a high standard of ethical and environmental trade practices such as the provision of safe working conditions / environment and the protection / welfare of employees / workers across the business. The organization incorporates the Modern Slavery act into all aspects of its business and expects that its suppliers and supply chain observes the same provisions of the Modern Slavery act and demonstrates a similar level of commitment to an ongoing program of maintaining and where practicable improving ethical and environmental practices.

Within Hall & Pickles 1812 Limited and the supply chain / suppliers working in association together, it is expected that the following points are incorporating within the organizations business practices.

**All Employment is freely chosen.**

There shall be no forced, bonded or involuntary labour within the workforce.

Workers are not required to lodge deposits or ID papers with employers and are free to leave work subject to reasonable notice.

**Freedom of association and the right to collective bargaining are respected.**

All workers have the right to join trade unions of their own choosing and to bargain collectively.

The employer shall be expected to adopt an open attitude towards the activities of trade unions and their organizational activities.

Workers representatives are not discriminated against and have access to carry out their representative activities within the workplace.

Where the right to freedom of association and collective bargaining is restricted under law, the employer will facilitate and not intentionally hinder the development of means to implement independence, free association, and collective bargaining.

**Working Conditions are safe and hygienic**

A safe and hygienic working environment shall be provided in line with industry guidelines and taking into account any specific hazards. Adequate and reasonably practicable steps will be taken to prevent accidents and injury to health arising out of, associated, or occurring in the course of work, by minimizing so far as reasonably practicable the causes of hazards within the working environment.

All employees will receive regular and recorded Health & Safety training.

All employees will have access to clean welfare facilities, canteen / rest room facilities including drinking water.

The company will ensure that responsibility for Health and Safety is assigned to a senior management representative.

**Child Labour shall not be used**

There will be no recruitment of child labour.

Young persons under the age of 18 will not be employed at night or in hazardous conditions.

**Living Wages are paid**

Wages and benefits paid for a standard working week will meet at the minimum national legal minimum wage requirements.

All Workers shall be provided with information that is understandable in relation to their employment conditions including wages before they enter employment.

**Working hours are not excessive**

Working hours must comply with national laws, collective agreements and should be based on international labour standards.

Working hours, excluding overtime shall be defined by contract and working time directive.

All overtime shall be voluntary. Overtime should be used responsibly, taking into consideration the following points: the extent, frequency and hours worked by individual workers and the workforce as a whole. It should not be used to replace regular employment. Overtime should always be compensated at a premium rate above the normal rate of pay.

The total hours worked in any seven day period should not exceed 60 hours except when the following points are considered.

Working hours may exceed 60 hours in any seven day period only in exceptional circumstances where all of the following are met.

It is allowed by national law.

It is allowed by a collective agreement freely negotiated with workers organistion representing a significant number of the workforce.

Appropriate safeguards are taken to ensure the protection of the workers Health and Safety.

The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks or emergencies.

Workers should 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.

**No discrimination is practised**

There will 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 orientaion, union membership or political afflilation.

**Regular employment is provided**

To every extent possible work performed must be on the basis of recognized 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 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 impact skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed term contracts of employment.

**No harsh or inhumane treatment is allowed**

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

**Safeguarding within the supply chain**

In this context, safeguarding means protecting a person’s health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect.

That the companies within the supply chain provide a safe and trusted environment which safeguards anyone who your company or organization has contact with, including but not exclusively staff, volunteers and beneficiaries.

That the companies within the supply chain set a culture that prioritizes safeguarding, so that it is safe for those affected to come forward and to report incidents and concerns with assurances that they will be handled correctly and following company and national guidelines.

That the companies within the supply chain ensure that there are adequate safeguarding policies, procedures and measures to protect people and that these policies and procedures are shared and understood.

That the companies within the supply chain have procedures in place outlining how incidents and allegations will be handled should they arise, including reporting to the relevant authorities.

All parties to whom this policy applies are required to comply with applicable national and international laws.

Signed: 

**Quality Assurance Group Manager:**

Date: June 2023

**Approved by:**

Signed: 

**Group M.D. / CEO**

Date: June 2023