

## ETHICAL TRADING POLICY

### Summary Statement

1. At Lucas UK Group Ltd we strongly believe in ethical principles and good Stewardship.
2. Where possible we trade according to the following Ethical Trading Criteria:
  - a. All employment is freely chosen.
  - b. Working conditions are safe and hygienic.
  - c. Child labour is not used.
  - d. Wages are fair and comparable to industry standard and will always exceed the minimum wage.
  - e. Deductions from wages as a disciplinary measure shall not be permitted.
  - f. Working hours are not excessive.
  - g. No discrimination is practiced.
  - h. Regular employment is provided for those who are employed on a permanent contract.
  - i. No harsh, cruel or degrading treatment or practices are allowed.
  - j. No bribery, corruption, blackmailing or bullying is permitted.
  - k. Third party suppliers and buyers are both free to sell and buy from any number of other businesses.
  - l. No restrictions, as a way of guaranteeing business are allowed.

## **Our Full Ethical Trade Policy Statement Policy**

### **Statement**

3. Lucas UK Group Ltd recognises that our commercial activities have potential to impact on our suppliers and our locality.
4. As a socially responsible small business our suppliers, local community and customers have the right to expect:
  - a. Products sourced by Lucas UK Group Ltd are produced under working conditions that are hygienic and safe.
  - b. All workers involved in the delivery of services provided by Lucas UK Group Ltd are treated with full consideration to their basic human rights.
  - c. Lucas UK Group Ltd acts in an ethical manner above and beyond basic legal requirements.
  - d. Lucas UK Group Ltd is therefore committed to implementing the principles of the Ethical Trading Initiative Base Code (although we are not members of the ETI).
  - e. Lucas UK Group Ltd commitment to its suppliers, service providers and customers.
  - f. Lucas UK Group Ltd recognises that our ethical and social performance and reputation is a key part of our overall commercial success.

### **Employees**

5. Lucas UK Group Ltd is committed to ensuring that our employment practices and the enforcement of corporate regulations ensure the protection of the rights of all those who work for us.
6. In many areas we aim to operate above the minimum standards required by law to ensure our employees are safe, rewarded and valued. As we of course expand and become larger we will be able to offer more opportunities for our staff.
7. We establish recognised relationships with our employees in accordance with existing legislation in UK or in any Country where we are obtaining products or sub-contracting.
8. All employees are provided with an easy to read, formal contract of employment with clarity in relation to wages.
9. In the case where an employee is unable to read, the contract of employment will be read and explained to them by a union representative or another appropriate third party.

## Customers

10. Lucas UK Group Ltd is committed to demonstrating its ethical and social responsibility credentials to enable customers to make informed choices about whose services they purchase.

## Suppliers

11. Lucas UK Group Ltd is committed to monitoring social standards in our supply chain and we encourage our suppliers to operate the same ethical standards we employ ourselves.

## Lucas UK Group Ltd Ethical Trading Code of Practice

12. This code of practice applies to:
  - a. Staff directly employed by Lucas UK Group Ltd on temporary or permanent contracts.
  - b. Staff employed or provided by contractors or employment agencies to work on Lucas UK Group Ltd premises or to undertake work on behalf of Lucas UK Group Ltd
  - c. No forced, bonded or involuntary labour shall be used.
  - d. All employment with Lucas UK Group Ltd is freely chosen.
  - e. Staffs are not required to lodge deposits or identity papers with us.
  - f. Staffs are free to leave Lucas UK Group Ltd after serving reasonable notice as set out in their contract of employment.

## 13. Child Labour

- a. In principal Lucas UK Group Ltd is against the use of child labour and believes its long-term elimination is ultimately in the best interests of children.
- b. However, the elimination of child labour must always be undertaken in a manner consistent with the best interests of the children concerned.
- c. Procurement and supply management professionals will ensure that their organisation's supplier comply with the following: in this context "child" refers to any persons less than 15 years of age unless local legislation on the minimum age stipulates a higher age for work or mandatory schooling in which case the higher age shall apply.

- d. Young person refers to any worker over the age of a child, as defined above, under the age of 18.
- e. We will develop or participate in and contribute to a policies and programmes which provide for the transition of any exiting worker found to be a child performing child labour to enable her or him to attend and remain in quality education until no longer a child
- f. Any supplier to Lucas UK Group Ltd who employ children and young person's at night in accordance with the ILO Conventions C70 Night Work of Young Persons ((Non-Industrial Occupations) Convention. 1946)) and C90 Night Work of Young Persons ((Industry) Convention (Revised), 1948)).
- g. Lucas UK Group Ltd will not employ children or young persons under 18 in hazardous conditions.
- h. In any event the course of action taken shall be in the best interest of the child, conform to the provisions of ILO C138 Minimum Age Convention (1973) and be consistent with the United Nation's Convention of the Rights of the Child.

#### **Working conditions are safe and hygienic**

- 14. A senior member of staff is assigned responsibility for Health and Safety.
- 15. Lucas UK Group Ltd takes adequate measures to prevent accidents and minimise potential hazards.
- 16. Staff receive regular health and safety training and have access to the Health and Safety Policy.
- 17. The nominated management representative regularly monitors compliance with the Health and Safety Policy.
- 18. Appropriate PPE is provided to all employees who require them at no cost to the individual.
- 19. Staff have unrestricted access to welfare, toilet facilities and drinking water and are entitled to regular breaks.
- 20. Lucas UK Group Ltd has a published Health & Safety Policy.

#### **Working hours and remuneration are reasonable and comparable to other companies in our sector and regular employment is provided.**

21. Staff pay rates are above the national legal minimum standards.
22. Staffs are not forced to work in excess of 48 hours per week.
23. Staffs are provided 2 days off per week.
24. Staff are given written terms and conditions of employment that details the employment relationship between and the respective obligations of the employee and the employer, rates of pay, working hours, grievance and disciplinary procedures, holiday entitlement, absence and sick pay rules and notice periods for termination of employment.
25. No deductions are made from wages as a disciplinary measure and pay slips detailing lawful deductions are provided for each pay period.
26. Labour only, contracting, sub-contracting and fixed term contracts are not used to avoid obligations under labour or social security laws.

**No discrimination is practiced:**

27. There is no discrimination in pay, hiring, compensation, access to training, promotion and termination of employment or retirement on the grounds of race, nationality, religion, age, disability, marital status, sexual orientation, union membership or political affiliation.
28. Opportunities for personal and career development are equally available to all employees.
29. No harassment, threats, abuse or intimidation shall be practiced. Physical, verbal and sexual threats, abuse, harassment or intimidation is expressly prohibited and grounds for summary dismissal, if proved.

**Employment Agencies**

30. Employment agencies contracted to supply temporary staff shall demonstrate commitment to and application of the requirements of this code.
31. Employment agencies contracted to supply temporary staff shall ensure that all staff supplied to Lucas UK Group Ltd are eligible to work in the UK by:
  - a. Following Immigration and Nationality Directorate Guidelines on Immigration, Asylum and Nationality Act 2006.
  - b. Ensuring that the requirements of the Immigration, Asylum and Nationality Act 2006 are met.

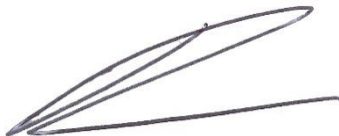
- c. Retaining copies of identity papers, work permits, or passport stamps as detailed in the Home Office List of Specified Documents and UK Passport Stamps.
32. Employment agencies contracted to supply temporary staff shall ensure that all staff supplied to Lucas UK Group Ltd have enough command of English to understand:
- a. The agency's responsibilities under this code of practice.
  - b. Lucas UK Group Ltd health and safety requirements.
  - c. Written statements of employment.
  - d. Or have other measures in place to ensure that all these requirements are communicated in the employee's native language.

### **Organisation**

33. Lucas UK Group Ltd Directors have overall responsibility for all aspects of ethical trading at work within the business.

### **Looking towards further improvement**

34. Lucas UK Group Ltd is always looking to develop and learn from others and welcome anyone that has any suggestions or feedback regarding our policy or practice to contact us.

A handwritten signature in dark ink, appearing to read "Danny Lucas". The signature is stylized with a large, sweeping initial 'D'.

Danny Lucas

Executive Chairman & MD

3<sup>rd</sup> January 2023