

Ethical Trading Policy

1. Policy Statement

- 1.1. This policy outlines Pro-Force's commitment to ethical trading. We work to promote improved conditions for all workers, and, through effective control measures, we can minimise the effect of ethical hazards on our workers and promote positive working conditions for all our staff.
- 1.2. The ETI Base Code is founded on the conventions of the International Labour Organisation (ILO), and is an internationally recognised code of labour practice. Pro-Force is committed to ensuring we work in connection with our clients to ensure these standards are met and adhered to.

2. Scope of the policy

- 2.1. This policy is applicable to all Pro-Force branches, sites and locations across the UK, any Company that falls into the Pro-Force Group, and to all staff members including directors, senior managers, managers, officers, employees and volunteers (collectively referred to as staff in this policy).
- 2.2. This policy does not form part of the contract of employment for employees, and as such, Pro-Force reserves the right to amend the policy at any time.

3. Responsibility for implementation of the policy

- 3.1. The Managing Director and the Senior Management Team have overall responsibility for the implementation of this policy.
- 3.2. The Compliance department is responsible for monitoring and reviewing the operation of this policy and making recommendations for changes to minimise risk to operations.
- 3.3. Line managers and supervisors are required to familiarise themselves with, and understand this policy, its operation, and any related procedures. Compliance will provide training documentation and guidance on the provisions of this policy, as is relevant to their responsibilities.
- 3.4. Questions related to the use, understanding or direction of this policy should be directed to the Compliance department.

4. Ethical Trading

- 4.1. Pro-Force recognises that its commercial activities have the potential to impact on its customers, and the environment. As a socially responsible business, our customers, clients and the local community, have a right to expect:
 - 4.2. That all workers involved in service delivery and business activities are treated with full consideration towards their basic human rights.
 - 4.3. Pro-Force acts in an ethical manner, above and beyond the basic legal requirements. Pro-Force is committed to the principles of the Ethical Trading Initiative Base Code. Pro-Force is committed to ensuring that all practices and enforcement of corporate regulations ensure the protection of the rights of all individuals engaged for work. Pro-Force will ensure to the best of its abilities to operate above the minimum standard required by legislation that the workplace is safe, rewarding and valuable.
 - 4.4. Pro-Force is committed to its ethical and social responsibility, enabling all clients and customers to have all applicable information available in order to make an informed and educated choice about services they may wish to purchase.
 - 4.5. Pro-Force is committed to encouraging all others with whom Pro-Force interacts and engages with during the course of business activities, operates to the same ethical standards. Pro-Force will ensure, to the best of its abilities, to operate above the minimum standard required by legislation to ensure no worker is subject to unfair treatment, discrimination or otherwise when interacting with others, be they businesses or individuals.

5. Principle 1

- 5.1. There is no forced, bonded or involuntary prison labour.
 - Pro-Force is committed to ensuring all workers are free from the threat of forced labour (coercion to work through the use of violence, or intimidation, or subtle means such as accumulated debt or threats of denunciation) and are free to choose what work they undertake free from any threats or negative recourse.
 - All Pro-Force workers have freedom of choice and the right to turn down assignments that they do not wish to undertake, free from threat or coercion.
 - All overtime is voluntary, as stated in the Contract for Services, and associated Registration Pack.
 - There is an established complaints procedure for workers to raise concerns regarding their working hours, which is communicated fully to all workers at their Induction, and regular toolbox talks (as in the Induction Presentation).
 - All complaints and associated responses / resolutions are monitored at a operational level, which is communicated centrally to a set schedule to management / HR to ensure any patterns / trends are

established, and root cause analysis can be carried out to enable the effective introduction of control methods.

- Workers are able to either Opt in or Opt out of the 48 Hour Rule under the Working Time Directive (as in the Registration Pack, and operational monitoring of those who have either opted in, or out, and that effect on staff / resource planning.
- Pro-Force does not subcontract any work to prisons, or other facilities known to hire prison labour.
- Pro-Force is committed to ensuring all clients who engage Pro-Force workers on assignment adhere to all applicable laws and labour standards.
- All new clients are assessed and audited (as in the New Client Pack) to ensure their operational, ethical and staff welfare standards meet the required grade before workers are engaged on assignment.
- Pro-Force is fully committed to demonstrating our operational, ethical and welfare standards to all clients by operating a fully transparent “open doors” policy, in which new and existing clients are encouraged to audit us.
- Workers are not required to pay any form of Work Finding Fee, either directly or indirectly.
- All Pro-Force employees with the responsibility for recruiting workers, both nationally and overseas (including advertising, sourcing, selection, interviewing and any related processes) are provided with Safe Recruitment Training to ensure they are carrying out recruitment process to the legal and the highest ethical standards.
- Pro-Force has a dedicated and suitably qualified Compliance Representative to ensure ethical, welfare and operational policies and procedures are adhered to.
- Regular meetings and training sessions are carried out with management responsible for worker and employee recruitment, discipline, termination, performance management and related aspects, to ensure effective communication and understanding of relevant processes.
- Regular internal audits take place on such processes to ensure they are being carried out effectively, and any associated hazards or potential risks are effectively controlled.
- All workers are paid to the agreed scheduled basis and in a timely manner, no unauthorised fines or deductions are carried out, and all outstanding wages (and any outstanding holiday or other entitlement) is paid upon a worker or an employee leaving Pro-Force.
- Pro-Force has a dedicated and suitably qualified Financial Manager and Payroll team to ensure all adherence to all legislative, regulatory and ethical standards are adhered to.
- Pro-Force is audited by external bodies (including HMRC, Accountants, Financial Auditors, Inland Revenue, Low Pay Commissioner, Insurance Brokers) to ensure compliance in all aspects of financial, payroll and tax matters.

5.2. Workers are not required to lodge “deposits” or their identity papers with their employer, and are free to leave their employment after reasonable notice.

- No worker is required to lodge deposits (as confirmed in the Accommodation Agreement and PPE standard forms) or identity papers (identity papers are provided by workers to Pro-Force to confirm their right to work, as part of the statutory checks, and are returned immediately) with Pro-Force.
- Pro-Force does not loan workers any money for any personal issues.
- Pro-Force does not hold workers identity papers. A copy is taken to ensure each worker has the Right to Work at Registration, and the originals are immediately returned to the worker once the copy is taken.
- All workers are free to leave their assignments and contract with Pro-Force after the provision of 1 weeks notice.
- Workers have full freedom of movement and are never physically prevented from leaving a workplace, accommodation or similar.
- There is an established complaints procedure for workers to raise concerns regarding any issue in connection with freedom of movement or similar, which is communicated fully to all workers at their Induction, and regular toolbox talks (as in the Induction Presentation).

6. Principle 2

6.1. Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

- Pro-Force does not restrict any worker from joining a trade union if they wish.

6.2. The employer adopts an open attitude towards the activities of trade unions and their organisational activities.

- Pro-Force does not formally recognise a trade union, however, if our clients recognise a trade union, workers are not restricted from joining trade unions and are provided with information about it.

Ethical Trading Policy

- 6.3.** Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- Pro-Force does not directly or indirectly discriminate against any worker for any reason, including trade union representatives, or when they are carrying out their duties.
- 6.4.** Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.
- Pro-Force works in connection with our clients to develop effective means of worker communication, including worker forums.

7. Principle 3

- 7.1.** A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards.
- Pro-Force assesses all new clients prior to the introduction of workers to ensure client sites are safe prior to supply (New Client Risk Assessment Form). This is carried out by suitably qualified people, and a physical client visit is carried out. Copies of risk assessments are obtained and an assessment that the workplace is safe is carried out.
 - All internal areas or work areas are fully risk assessed and actions evidenced and completed to mitigate risks to staff.
- 7.2.** Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- All workers receive basic health & safety training (including manual handling) prior to the commencement of any assignment, as part of the Pro-Force Induction.
 - Pro-Force works in connection with clients to ensure they are provided with suitable health & safety training to carrying out their work effectively & safely.
 - Pro-Force works to create a positive health & safety culture, and ensure that all workers work in an environment that is safe, they feel they can raise concerns, and have any concerns suitably addressed.
- 7.3.** Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- All clients are assessed prior to supply to ensure adequate welfare facilities are provided to workers.
 - Physical site visits are carried out to ensure premises are safe prior to the commencement of supply.
- 7.4.** Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- Pro-Force ensures all accommodation is of a safe standard, as per our Accommodation Standards Policy and Accommodation Management Systems Policy.
 - All accommodation is risk assessed by a qualified assessor to ensure adherence to the relevant law, and make appropriate recommendations for change.
 - All accommodation is checked on a routine basis to ensure it is of a safe standard.
- 7.5.** The company observing the code shall assign responsibility for health and safety to a senior management representative.
- Responsibilities are clearly assigned within our H&S Policy, and with our clients via the New Client pack.

8. Principle 4

- 8.1.** There shall be no new recruitment of child labour.
- Pro-Force has never, and shall never, engage any person(s) on a contract for services, a contract of employment (or any other applicable engagement for work agreement) who is under the age of 18.
 - Pro-Force abides by national and international standards on child labour (not engaging those under the age of 15) and do not provide work suitable for those defined as a young worker (those over 15 but under 18) due to the nature of the work – agricultural, horticultural, industrial and driving work.

Ethical Trading Policy

8.2. Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.

- Pro-Force does not engage workers under the age of 18 under any form of work agreement.
- Pro-Force ensures verification of all ages as part of identification checks at Registration, as a part of the Right to Work checks. Copies of identification documents are taken and retained in individual personnel files for each worker.
- Pro-Force can provide, through documentary records, that no one under the age of 18 has been engaged for work.

8.3. Children and young persons under 18 shall not be employed at night or in hazardous conditions.

- Pro-Force does not engage children or young persons to undertake any form of work, whether at night or not, due to the nature of the work.

8.4. These policies and procedures shall conform to the provisions of the relevant ILO standards.

- Pro-Force, through operating a policy of not engaging workers under the age of 18, can demonstrate adherence to the relevant ILO standards. This policy is on the basis that the type of work undertaken by Pro-Force workers is not suitable for workers under the age of 18 on health & safety grounds.

9. Principle 5

9.1. Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher

- Pro-Force ensures that each and every worker is paid at a rate that is at least equivalent to the National Minimum Wage
- Pro-Force ensure that all new clients complete relevant paperwork (New Client Pack) which is reviewed by both Compliance and Financial representatives, where rates of pay (including basic hourly rate, overtime, bonus / piecework and any other applicable payments) are detailed.
- If a worker is working on piece rate, and does not meet the rate required (as set by the average expected rate of equivalent workers engaged on the same or similar work – a fair rate) Pro-Force will top up their payment (NMW make up pay) to ensure they are paid at a rate that is equivalent to the National Minimum Wage.
- Pro-Force does not engage with 2nd tier providers, enabling full control over worker payments to ensure all workers are paid in line with the relevant HMRC standards and applicable legislation.
- Pro-Force is regularly audited by both clients and external auditors (including HMRC) which includes assessment of payroll procedures.

9.2. 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.

- All workers are provided with an Assignment Details Schedule prior to the commencement of any assignment detailing their rates of pay, location of work, skills required and all information regarding their work, as is required by law.
- All workers are provided with a copy of their Contract for Services, detailing the terms and conditions of their engagement for work, and for Pro-Force to provide work finding services.
- All workers are provided with a copy of the Worker Handbook, providing full details regarding working for Pro-Force, including general workers rights and processes such as holiday, sickness and conduct / performance standards.

9.3. 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.

- No worker is deducted wages as a disciplinary measure, e.g. for lateness or anything similar.
- Any applicable deductions (authorised Accommodation Offset) are only carried out if the worker chooses to use the accommodation, and understands the offset rate, confirming that agreement with a signed Accommodation Agreement.

10. Principle 6

Ethical Trading Policy

- 10.1.** Principle 6.1. Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.
- Pro-Force complies with all UK law regarding working hours, as detailed in our Working Time Policy.
 - Working time is monitored on an operational level through rota systems, time and attendance systems (NOMAD, Crop Picker) and clients systems.
 - Workers who have Opted In or Out of the Working Time Regulations are recorded to ensure working hours to not exceed the statutory limits.
- 10.2.** Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.
- Working time is defined in accordance with the Working Time Regulations, and does not exceed 48 hours per week, unless the worker agrees in writing that this limit shall not apply.
 - Working time is clearly communicated to each workers, and workers are entitled to take their legal breaks, and rest periods between shifts.
- 10.3.** All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.
- All overtime rates are clearly detailed in completed Client Packs (pre and post 12 weeks AWR) detailing the time in which overtime becomes applicable, and the rate of pay, which is almost always paid at a premium.
 - We work with our clients to ensure that premium is in line with the ethical requirements detailed in this code.
- 10.4.** The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.
- Working time is closely monitored to ensure workers are entitled to their legal rest breaks and rest periods.
- 10.5.** Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where all of the following are met: This is allowed by national law; This is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce; Appropriate safeguards are taken to protect the workers' health and safety; and the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
- Working hours do not typically exceed 60 hours per week.
 - In exceptional circumstances, working hours may exceed this limit, but will always be assessed on a case by case standard, and working hours are not in excess of 60 hours per week as a standard, or used to cover expected seasonal peaks.
 - Pro-Force works closely with clients to understand staffing requirements and ensure the correct ratio of staff to hours is adhered to, to ensure workers are not working in excess of 60 hours, or 48 if they have not signed (free of choice) their 48 hour Opt Out.
- 10.6.** Principle 6.6. Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period. *International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced.
- Workers are provided with the required days off in accordance with the Working Time Regulations.
 - All information regarding working time is communicated to workers in their Induction & Handbook.
 - All Pro-Force staff with a responsibility for booking workers onto work are trained on, understand and adhere to the requirements regarding working time.

11. Principle 7

- 11.1.** 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.

- Pro-Force does not discriminate in any form against any worker, in accordance with our Equal Opportunities Policy.

11.2. Regular employment is provided

- In so much as is possible, regular employment is provided to workers.
- Pro-Force operates as an Employment Business and is subject to the requirements of clients regarding the provision of work.
- Full information regarding work options is provided to workers so they understand the patterns and length of their work options.

11.3. To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

- All Pro-Force Workers are engaged on assignment with clients under a contract for services (or other legally compliant contractual engagement) with Pro-Force. No other form of engagement is recognised for Pro-Force workers. All Pro-Force permanent employees are engaged under a Contract of Employment. Pro-Force does not engage any worker for work under an illegal or casual contractual arrangement.

11.4. 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 impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

- Pro-Force operates only using recognised forms of engagement for work (in accordance with UK law).

12. Principle 8

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

- Pro-Force has an established Bullying, Harassment & Victimisation Policy, and no workers are subject to such. Pro-Force has recognised methods for workers to raise grievances, or raise problems, which are communicated in their Induction, worker handbook, regular toolbox talks and other methods. Pro-Force operates a zero tolerance policy on all aspects of violence, abuse, harassment, or intimidation.

13. Principle 9

13.1. Pro-Force does not restrict any worker from joining or forming any trade unions or to bargain collectively.

14. Policy Review

14.1. The Compliance department is responsible for reviewing this policy annually, or as is required, to ensure that it meets legal standards and reflects best practice.

August 2018

Name MATTHEW TARBETZ

Signed 