

ETHICAL SOURCING POLICY

At Celtic Contractors Ltd, we are committed to taking a leadership role in our industry, by subscribing to high standards of ethical conduct.

Celtic Contractors Ltd's policy is to seek to purchase goods and services which:

- a) are produced and delivered under conditions that do not involve the abuse or exploitation of any persons;
- b) have the least negative impact on the environment.

We will do this by working with all of our suppliers to positively influence our social, ethical and environmental performance.

We look for suppliers who demonstrate a commitment to implementing policies and practices consistent with and complementary to, our own.

Purpose

The purpose of the policy is to:

- a) promote good labour and environmental standards in the supply chains of Celtic Contractors Ltd;
- b) to protect Celtic Contractors Ltd's reputation

Code of Conduct for Suppliers

Celtic Contractors Ltd expects suppliers to adopt sound labour practices; also expect them suppliers to treat their employees fairly, in accordance with local laws and regulations relating to labour and employment.

A. Labour Standards

The labour standards in this code are based on the conventions of the International Labour Organisation (ILO).

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 the employer and are free to leave their employer after reasonable notice.

Freedom of association and the right to collective bargaining are respected:

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

- The employer adopts an open attitude towards the legitimate activities of trade unions.
- Worker's representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- 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.

Working conditions are safe and hygienic:

- A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. 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.
- Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers. *Access to clean toilet facilities and potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- The company observing the standards shall assign responsibility for health and safety to a senior management representative.

Child Labour shall not be used:

- There shall be no new recruitment of child labour.
- 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/him to attend and remain in quality education until no longer a child.
- Children and young people under 18 years of age 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.

Living wages are paid:

- Wages and benefits paid for a standard working week meet, at a minimum, national legal standards, or industry benchmarks, whichever is higher. In any event wages should always be high 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 express and informed permission of the worker concerned. All disciplinary measures should be recorded.

Working hours are not excessive:

- Working hours complies with national laws and benchmark industry standards, whichever affords greater protection.

- In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7day period on average. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

No discrimination is practised:

- 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.

Regular employment is provided:

- To every extent possible work performed must be on the basis of a 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 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.

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.

B. Environmental Standards

Suppliers should as a minimum comply with all statutory and other legal requirements relating to the environmental impacts of their business. Detailed performance standards are a matter for suppliers, but should address at least the following:

Waste Management:

- Waste is minimised, and items recycled whenever this is practicable. Effective controls of waste in respect of ground, air, and water pollution are adopted. In the case of hazardous materials, emergency response plans are in place.

Packaging and Paper:

- Undue and unnecessary use of materials is avoided, and recycled materials used whenever appropriate.

Conservation:

- Processes and activities are monitored and modified as necessary to ensure conservation of scarce resources, including water, flora and fauna and productive land in certain situations.

Energy Use:

- All production and delivery processes, including the use of heating, ventilation, lighting, IT systems and transportation, are based on the need to maximise efficient energy use and to minimise harmful emissions.

C. Business Behaviour

The conduct of the supplier should not violate the basic rights of Celtic Contractors Ltd's intended beneficiaries. The supplier should not be engaged:

1. in the manufacture of arms;
2. in the sale of arms to governments which systematically violate the human rights of their citizens; or where there is internal armed conflict or major tensions; or where the sale of arms may jeopardise regional peace and security.

D. Monitoring and Compliance

Celtic Contractors Ltd reserves the right to audit compliance with this policy or appoint a third party to conduct an audit. All violations will be reported to the supplier's management for their attention and appropriate corrective action. Regardless of corrective action required, Celtic Contractors Ltd may terminate its relationship with any supplier who does not comply with the Ethical Sourcing Policy, without liability to the supplier for damages resulting from termination.

A handwritten signature in black ink, appearing to read 'Jon Whyte', is written over a faint, illegible stamp or watermark.

Jon Whyte

Date: 01.09.2021

Managing Director
Celtic Contractors Ltd