

## **Ethical Trading & Anti Bribery Policy**

This policy outlines Rame and Stonehouse CDM's commitment to operate and trade in an ethical way and meet all national and international bribery and corruption legislation, codes of practice and guidance.

### **Ethical Trading & Anti Bribery Policy Statement**

Rame and Stonehouse CDM believe strongly in ethical principles. We respect the human rights of our employees and those in our supply chain. We have zero tolerance of bribery, slavery and human trafficking, and ensure that forced, bonded, involuntary labour, child labour, bribery, slavery and human trafficking does not take place within our business, or in our supply chain by:

- Ensuring all employment is freely chosen, is transparent and robust
- Working conditions are safe and hygienic
- Child labour is not used
- Wages exceed Living wage, are fair and comparable to industry standard
- Deductions from wages as a disciplinary measure shall not be permitted
- Working hours are not excessive
- No discrimination is practised
- Regular employment is provided for those who are employed on a permanent contract
- No harsh, cruel or degrading treatment or practices are allowed
- No bribery, corruption, blackmailing or bullying is permitted
- Ensure that any charitable donations do not constitute bribery
- Ensure commitment from our suppliers to share our policies
- Third Party Suppliers and buyers are both free to sell and buy from any number of other businesses. No restrictions, as a way of guaranteeing business, are allowed

As a small business we rely on strong, collaborative relationships with our suppliers, customers and our employees. It is imperative to our success that we operate in a fair and transparent manner and do not tolerate any unethical behaviour.

This statement outlines the steps that Rame and Stonehouse CDM has taken to ensure that slavery and human trafficking it not taking place within our company or at the businesses of our suppliers.

We recognise that commercial activities have a potential to impact on suppliers and locality. As a socially responsible business, suppliers, local community and customers have a right to expect:

- Services provided by our organisation are produced under working conditions that are hygienic and safe.
- All workers involved in the delivery of services provided by us are treated with full consideration to their basic human rights.
- We act in an ethical manner above and beyond basic legal requirements.

### **Our commitment to suppliers and clients:**

We recognise that ethical and social performance and reputation is a key part of overall commercial success, particularly for small businesses like ourselves.

### **Employees**

Rame and Stonehouse CDM is committed to ensuring that employment practices and the enforcement of corporate regulations ensure the protection of the rights of our team.

We aim to operate above the minimum standards required by law to ensure employees are safe, rewarded and valued.

As the company expands and becomes larger we will be able to offer more opportunities to staff.

## Clients

Rame and Stonehouse CDM is committed to demonstrating its ethical and social responsibility credentials to enable clients to make informed choices about whose services they purchase.

### Ethics Concerning Customers

We, and our team will not be involved in any of the following practices:

- Bribery or perceptions of bribery
- Companies interference in ethnic and tribal conflict or violence
- Trade influence on other governments' domestic politics
- International Price fixing

## Suppliers

We are committed to monitoring social standards in the supply chain, and encourage suppliers to operate with the same ethical standards.

## Ethical Trading & Anti Bribery Code of Practice

This code of practice applies to: all employees on temporary or permanent contracts.

Staff employed or provided by contractors or employment agencies to work at our premises or to undertake work for or on behalf of Rame Architects / Stonehouse CDM.

### No forced, bonded or involuntary labour shall be used:

- Ensuring all employment is freely chosen, is transparent and robust
- Employees are free to leave the company after their agreed notice period

### No child labour shall be used:

- There shall be no recruitment of child labour
- Children or persons under 16 are not employed at any time, day or night (Work Experience excluded)
- Persons under 18 have their hours restricted in line with current employment law

### Working Conditions are safe and hygienic:

- Rame and Stonehouse CDM take adequate measures to prevent accidents and minimise potential hazards via Risk assessments and Procedures manuals
- Employees receive regular Health and Safety training
- Employees have unrestricted access to toilet facilities and drinking water

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

- Employee pay rates exceed Living Wage
- Employees are not forced to work in excess of 48 hours per week
- Staff are provided 2 days off per week (Overtime Excluded)
- Employees are given written terms and conditions of a contract of employment that details the employment relationship between and the respective obligations of the employee and employer, rates of pay, working hours, grievance and disciplinary procedures, holiday entitlement, absence and sick pay rules and notice periods for termination of employment
- No deductions are made from wages as a disciplinary measure and pay slips detailing lawful deductions are provided for each pay period
- Labour only contracting, Sub contracting and fixed term contracts are not used as a means to avoid obligations under labour or employment laws

**Discrimination:**

- There is no discrimination in pay, hiring, compensation, access to training, promotion, and termination of employment or retirement on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, political affiliation, sex and sexual orientation.
- Opportunities for personal and career development are equally available to all employees

**Harassment:**

- No harassment, threats, abuse or intimidation shall be practised. Physical, verbal and sexual threats, abuse, harassment or intimidation is expressly prohibited and grounds for summary dismissal, if proven.

**Anti Bribery:**

- No bribery, corruption, blackmailing or bullying is permitted
- Ensure that any charitable donations do not constitute bribery
- Never, without express prior written approval from the MD, offer or accept gifts or hospitality to or from clients, contractors, suppliers, other third parties or public officials. Gifts include flowers, vouchers, food and drink as well as event and travel tickets given to an individual when they are not to be used in a hosted business context. Hospitality includes invitations to hosted meals, receptions and events for business purposes

**Employment Agencies:**

If employment agencies are contracted to supply temporary staff, they shall demonstrate commitment to and application of the requirements of this code.

Employment agencies contracted to supply temporary staff shall ensure that all staff supplied to us are eligible to work in the UK by:

- Following Immigration and Nationality Directorate Guidelines on Amendments to Section 8 of the Asylum and Immigration Act 1996
- Ensuring that the requirements of the Immigration and Asylum Act 1999 Section 22 Code of Practice are met
- Retaining copies of identity papers, work permits or passport stamps as detailed in the Home Office List of Specified Documents and UK Passport Stamps



Employment agencies contracted to supply temporary staff shall ensure that all staff supplied to us have sufficient command of English to understand:

- The agency's responsibilities under this code of practice
- Our Health and Safety requirements
- Written statements of employment particulars
- Have other measures in place to ensure that all these requirements are communicated in the employee's native language

The company MD has overall responsibility for all aspects of ethical and anti bribery at work within the business. All employees are responsible for complying with this policy and we will provide adequate resources to ensure our legal obligations are met. This policy is reviewed, maintained and amended annually or when there is a regulatory and legislative change that requires action.