



Ethical Trading Policy

Purpose

The purpose of this policy is to provide a clear, written statement of our stance with regard to Ethical Trading Standards. This is part of our continuing commitment to best practice within our Industry.

Ethical Trading Initiative Base Code

As a business we are committed to the basic principles of the Ethical Trading Initiative (ETI) base code, in respect of employment practices:

1. Employment is freely chosen
2. Freedom of association and the right to collective bargaining
3. Working conditions are safe and hygienic
4. Child labour will not be used
5. National Living Wage/National Minimum Wage are paid
6. Working hours are not excessive
7. No discrimination is practiced
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed
10. The employment of agency labour will be monitored and managed to ensure legal compliance and fair treatment for contracted employees.

We are working with all our employees and suppliers to maintain, develop and continuously improve standards using the principles of the base code.

The provisions of this code constitute minimum and not maximum standards, and this code must not be used to prevent us from exceeding these standards.

We are expected to comply with national and other applicable law and, where the provisions of law and this policy address the same subject, to apply that provision which affords the greater protection.

Reflex are members of SEDEX who, although not a standard setting body, code of conduct or certification, have a role of enabling the effective sharing and managing of supply chain information, with the aim of driving continuous improvement.

Reflex also recognises the importance of sustainability of raw materials and as such is committed to promote the usage of certified materials (FSC & PEFC) where ever we can under the terms of our multi-site certification.

Process

The Ethical Trading Policy is endorsed by the Board of Directors. The policy is reviewed annually, communicated to all employees and made freely available to our suppliers and sub-contractors. The Ethical Trading Policy Statement which lists the aspects of the base code is displayed on company notice boards at all sites.





Reflex

Our Ethical Trading commitment is also supported by the following:

- Employees receive a written contract of employment within two months of commencing work, detailing their pay structure, method of pay and terms and conditions of employment.
- Employees receive an itemised pay statement to ensure that they are aware of labour and social security obligations (e.g. income tax, National Insurance) that are met on their behalf by the Company. No deductions are made from an employee's pay, other than those required by law, without the express written permission of the employee.
- No employee is required to work more than their contracted hours on a regular basis. Those who choose to regularly work more than 48 hours each week, complete an opt-out prior to working, which is held on file.
- Overtime, when worked, is paid at a premium rate as detailed at time of employment. All employees are entitled to an agreed allowance of paid holiday, equal to or above the statutory minimum.
- The company provides an Employee Handbook which outlines employee's statutory rights, and company rules and guidelines.
- Policies and procedures that adhere to statutory requirements and industry best practice are publicised in the Employee Handbook. Examples of these are:
 - .. Disciplinary and grievance policies.
 - .. Equal opportunities policy.
- When required, the Company will use registered agencies only, for sourcing labour. Any agency used will be required to adhere to the Company's policy relating to the supply of agency labour. The Company will undertake to audit agencies used, to ensure compliance with UK law and Company policy. Agencies will be required to confirm their compliance in writing.
- Wages paid meet the requirements of the National Minimum Wage legislation.
- Training resources are made available to meet required standards empowering all employees to apply the standards of the base code in their day to day operations.
- A commitment to Health and Safety. The company has a clear policy and actively takes steps to prevent accidents and injury to health arising out of work activities through detailed risk assessments and accident investigations. Employees also receive regular and recorded health and safety training.
- Performance Appraisal system.
- Standard operating procedures.
- Hazard & Risk Management System.
- Environmental Management System and associated policy.

Monitoring

The Operations Managers at each site are responsible for the implementation and monitoring of the Ethical Trading standard and any concerns regarding whether the standards are being met are referred to the designated Director.

Last Reviewed January 2026

Next review due January 2027

