

ETHICAL TRADING CODE

VALE MILL (Rochdale) LIMITED

Employment should be freely chosen

All workers should be working of their own free will. The company commits to use no involuntary prison labour, bonded labour or other forced labour of any kind. No monetary deposits should be required or deducted from pay. Original identity or similar documents should not be held by the employer.

All workers should be able to leave their jobs if they choose, without losing pay or benefits to which they are entitled, having given a reasonable notice period.

Freedom of association and the rights to collective bargaining should be respected

The company commits to respect worker's rights to freedom of association. Workers are permitted to join or form trade unions, or similar groups, in order to negotiate collectively with management on employment matters.

Trade unions or other workers' representatives should be treated fairly, without discrimination, and be allowed to represent workers effectively.

Working conditions should be safe and hygienic

Health and safety of employees should be actively managed, including control of risks arising from machinery and tools, production materials and chemicals, fire, noise, dust, temperature extremes, buildings' structure, sanitary facilities, and should include the provision of adequate personal protective equipment, machine guarding, job training, escape routes, fire fighting equipment, ventilation, safety notices and information, safety training, first aid materials and qualified personnel, accident and illness records and corrective actions, clean toilet, washing and changing facilities, safe food storage, drinking water, clean, safe and private accommodation (where provided).

Child labour should not be used

All workers should be 16 years old and over.

Night workers or workers in perceived hazardous areas shall be 18 years or over.

If child labour is identified within the workforce all identified parties will be referred to appropriate Government authorities.

The company commits to ending child labour found in the supply chain; any child labour that is found will have any child labour removed and the children will be placed in education and / or vocational training.

Any children of school age who apply for "work experience" will not be placed in a factory/warehouse environment. All "work experience" candidates will be placed in an administrative environment in an observational capacity only and will be mentored by an appropriate manager.

Living wages should be paid

All workers should earn at least the minimum legal wage (or the minimum wage established within the industry, or the minimum wage necessary to provide for basic living requirements, whichever is the higher) for a standard working week, including after permitted deductions have been made.

Written details, provided prior to commencement of employment, should clearly communicate all conditions of employment pertaining to pay, including overtime arrangements.

Pay slips, provided to each worker each time they are paid, should clearly indicate how the pay has been calculated, including basic hours, overtime hours and permitted deductions.

Worker's hours should not be excessive

Working hours should comply with national law and industry standards. At least one day in seven should be free as a rest day. The working of overtime should be voluntary and not mandatory.

Overtime working should not be either regular or routine. Overtime should be paid at a premium rate as specified in national law or at otherwise accepted rates.

No discrimination should be practised

There should be no discrimination or preferential treatment given to any worker or group of workers on the grounds of sex, including pre and post pregnancy, race, caste, national origin, religion, age, disability, marital status, Trades Union or workers' council membership or political affiliation, with regard to provision of employment, pay and benefits, working conditions, training, promotion, pension, overtime opportunity.

Regular employment must be provided

Employment should be provided on the basis of a recognised employer/worker relationship as established through national law and practice.

Employer obligations should not be avoided by excessive use of labour-only contracting, sub-contracting, fixed term contracts, home-working or apprenticeship schemes or probationary periods.

All workers should be entitled to paid leave, sickness leave and maternity leave with no detriment to their employment status.

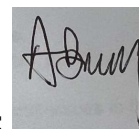
There should be no harsh or inhumane treatment

Workers should not be subject to corporal punishment, physical abuse (or threat of physical abuse), verbal abuse, sexual harassment, bullying or any other form of intimidation in the workplace.

There should be no such behaviour permitted between workers.

Name: Antony Berezanskij

Signature:

A handwritten signature in black ink, appearing to read 'Antony Berezanskij', on a light-colored background.

Position: Director of Manufacturing
Issue 07

Date: 14.11.2022