

# Ethical Trading Policy

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<b>Approved by:</b>	Peter Howells, Technical Director

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<b>Applies to:</b>	Positive ID Labelling Ltd and its supply chain

## 1. Purpose and Scope

Positive ID Labelling Ltd is committed to operating our business ethically and to working with supply chain partners who share our values. This Ethical Trading Policy sets out the standards we expect from ourselves and from those who supply goods and services to us, and the steps we take to embed those standards in our business relationships.

This policy is informed by the Ethical Trading Initiative (ETI) Base Code, which is itself founded on the conventions of the International Labour Organization (ILO). It applies to all Positive ID Labelling Ltd operations and to our direct supply chain. We expect our suppliers to communicate equivalent standards to their own supply chains.

## 2. Our Ethical Trading Principles

### 2.1 Employment is freely chosen

There is no forced, bonded, trafficked, or involuntary labour in our business or in the supply chains we work with. Workers are free to leave after giving reasonable notice. No worker is required to lodge deposits or identity documents, and no person is held in debt bondage or compelled to work through any threat, force, or coercion.

### 2.2 Freedom of association and the right to collective bargaining

Workers are free to join, or to refrain from joining, trade unions or worker associations of their choice, and to bargain collectively where permitted by law. Workers' representatives are not discriminated against, and those representatives have access to carry out their functions in the workplace. Where freedom of association is restricted by law, we expect suppliers to facilitate alternative means of worker representation.

### 2.3 Working conditions are safe and hygienic

A safe, hygienic working environment is provided, bearing in mind the prevailing knowledge of the industry and the specific hazards of the work being undertaken. Adequate steps are taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work. Workers

receive regular, recorded health and safety training. Physical and chemical hazards are properly identified and controlled. Facilities for accessing food, drinking water, and welfare are provided where appropriate.

#### **2.4 Child labour shall not be used**

There is no recruitment of child labour. We follow the relevant ILO definitions and national law on minimum working age. Children and young persons are not exposed to situations in or outside the workplace that are hazardous, unsafe, or harmful to their health. We support legitimate apprenticeship, training, and internship programmes that comply with applicable law.

#### **2.5 Living wages are paid**

Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. All workers are provided with written, understandable information about their employment conditions in respect of wages before they enter employment, and about the particulars of their wages for the pay period concerned, each time they are paid. Deductions from wages as a disciplinary measure are not permitted, nor are any deductions not provided for by national law, without the express permission of the worker concerned.

#### **2.6 Working hours are not excessive**

Working hours comply with national laws, collective agreements, and the standards set out in ILO conventions on working hours. In any event, workers are not required to work more than 48 hours per week on a regular basis and are provided with at least one day off for every seven-day period. Overtime is not demanded on a regular basis, is voluntary, is compensated at a premium rate, and does not exceed the limits permitted by applicable law or collective agreements.

#### **2.7 No discrimination is practised**

There is no discrimination in hiring, compensation, access to training, promotion, or termination of employment on the grounds of race, colour, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, trade union membership, political affiliation, or any other characteristic protected by applicable law. All employment and supplier engagement decisions are made on the basis of relevant and objective criteria.

#### **2.8 Regular employment is provided**

Obligations to workers are not avoided through the use of labour-only contracting, sub-contracting, homeworking arrangements, apprenticeship schemes where there is no real intent to impart skills or provide regular employment, or through the excessive use of fixed-term contracts. Workers are informed, at the outset of their engagement, of the terms and conditions under which they are employed.

#### **2.9 No harsh or inhumane treatment is allowed**

Physical abuse or discipline, threats of physical abuse, sexual or other harassment, verbal abuse, and other forms of intimidation are prohibited in all our operations and those of our supply chain partners. Disciplinary procedures must be clearly communicated, fair, transparent, and consistently applied.

### 3. Environmental Responsibility

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We recognise that responsible environmental practice is part of ethical business conduct. We are committed to managing our environmental impact responsibly, including through the use of FSC-compliant materials throughout our operations. We expect our suppliers to maintain compliance with all applicable environmental legislation and to manage their environmental impacts actively.

### 4. Anti-Bribery and Corruption

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Positive ID Labelling Ltd operates a zero-tolerance approach to bribery and corruption in any form, whether in our own operations or in our supply chain. We comply with the Bribery Act 2010 and expect our suppliers and partners to do the same. No employee or supplier representative may offer, give, request, or accept any bribe, kickback, or improper advantage in connection with our business.

### 5. Supplier Engagement

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We communicate these standards to our suppliers as part of our procurement process. We expect suppliers to:

- Comply with all applicable laws and regulations in the countries in which they operate.
- Meet the standards set out in this policy as a minimum requirement for our supplier relationship.
- Co-operate with any reasonable request from us to provide information about their labour practices, employment conditions, or supply chains.
- Notify us promptly of any material breach of these standards and the steps being taken to remedy it.
- Cascade equivalent standards to their own key sub-suppliers.

Where we identify a supplier who is not meeting these standards, our first preference is to work with them constructively to achieve improvement. We recognise that an exit from a supplier relationship may in some circumstances cause harm to the workers involved, and we will consider that carefully before taking such a step. However, where a supplier is unwilling to engage seriously with concerns, or where the conduct is sufficiently serious, we will terminate the relationship.

### 6. Governance and Review

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Responsibility for this policy and its implementation rests with the Technical Director. Progress against our ethical trading commitments is reviewed as part of the annual management review. This policy is reviewed annually and updated as necessary to reflect changes in applicable law, internationally recognised standards, or our business activities.

Concerns about breaches of this policy – whether relating to our own operations or to our supply chain – should be raised in accordance with our Grievance Policy. We are committed to investigating all such concerns promptly and without retaliation against those who raise them.

**Peter Howells**

Technical Director, Positive ID Labelling Ltd

Date: April 2026