



CHARLES FELLOWS SUPPLIES LTD

PROCUREMENT & LOGISTICS

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Ethical Employment Policy Within Our Own Organisation and Our Supply Chains

Charles Fellows Supplies Ltd is fully aware of the responsibility we bear towards our customers, employees, business partners and supply chain with which we work. In January 2023, we adopted the Welsh Government's Code of Practice for Ethical Employment in Supply Chains and committed to ensuring that slavery and human trafficking are not taking place in any part of our organization and our supply chains.

We are committed to ensuring that the working conditions of our supply chain are safe, that workers are treated with respect and dignity. We require from our suppliers and business partners and their supply chains to operate in full compliance with the laws, rules, and regulations of the countries in which they operate.

To make this a reality, we have developed an action plan to meet the twelve commitments in the Code in accordance with the Welsh Government's Code of Practice on Ethical Employment in Supply Chain.

In compliance with the Code to guide our business dealings, Charles Fellows Supplies Ltd:

1. Has drawn up an Ethical Employment policy for our organisation and supply chains and appointed our Compliance Director as Anti-Slavery and Ethical Employment Champion.
2. Produced a whistle-blowing policy to empower staff to raise suspicions of unlawful and unethical employment practices, and which places a responsibility on staff to report criminal activity taking place within our own organisation and our supply chains. Once produced we will communicate the policy throughout our organisation. We will review the policy annually and monitor its effectiveness. We will also: provide a mechanism for people outside our organisation to raise suspicions of unlawful and unethical employment practices.
3. Ensure that those involved in buying/ procurement and the recruitment and deployment of workers, receive training on modern slavery and ethical employment practices, and keep a record of those that have been trained.
4. Ensure that employment practices are considered as part of the procurement process.
 - 4.1. We will include a copy of our Policy on ethical employment in all procurement documentation.
 - 4.2. Include appropriate questions on ethical employment in tenders and assess the responses provided.
 - 4.3. Incorporate, where appropriate, elements of the Code as conditions of contract.
 - 4.4. Ask bidders to explain the impact that low costs may have on their workers each time an abnormally low quote or tender is received.
5. Ensure that the way in which we work with our suppliers does not contribute to the use of illegal or unethical employment practices within the supply chain. We will:
 - 5.1. Ensure that undue cost and time pressures are not applied to any of our suppliers if this is likely to result in unethical treatment of workers.



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- 5.2. Ensure that our suppliers are paid on time – within 30 days of receipt of a valid invoice.
6. Expect our suppliers to sign up to this Code of Practice to help ensure that ethical employment practices are carried out throughout the supply chain.
7. Assess our expenditure to identify and address issues of modern slavery, human rights abuses and unethical employment practice. We will:
 - 7.1. Carry out regular reviews of expenditure and undertake a risk assessment on the findings, to identify products and/or services where there is a risk of modern slavery and/or illegal or unethical employment practices within the UK and overseas.
 - 7.2. Investigate any supplier identified as high risk, by direct engagement with workers wherever possible.
 - 7.3. Work with our suppliers to rectify any issues of illegal or unethical employment practice.
 - 7.4. Monitor the employment practices of our high risk suppliers, making this a standard agenda item for all contract management meetings/reviews.
8. Ensure that false self-employment is not undertaken and that umbrella schemes and zero hours contracts are not used unfairly or as a means to:
 - 8.1. Avoid, or facilitate avoidance of, the payment of tax and National Insurance contributions and the relevant minimum wages.
 - 8.2. Unduly disadvantage workers in terms of pay and employment rights, job security and career opportunities.
 - 8.3. Avoid Health and Safety responsibilities.
9. Ensure that workers are free to join a Trade Union or collective agreement and to undertake any related activity and raise worker concerns without risk of discrimination. We will:
 - 9.1. Not make use of blacklists/prohibited lists.
 - 9.2. Ensure that our suppliers do not make use of blacklists/prohibited lists.
 - 9.3. Not contract with any supplier that has made use of a blacklist/prohibited list and failed to take steps to put matters right.
 - 9.4. Expect our suppliers to ensure that Trade Union representatives can access members and contracted workers.
10. Consider paying all staff the Living Wage Foundation's Living Wage as a minimum and encourage our suppliers to do the same. We will:
 - 10.1. Consider paying at least the Living Wage Foundation's Living Wage to all our staff in the UK.
 - 10.2. Consider becoming an accredited Living Wage Employer.
 - 10.3. Encourage our suppliers based overseas to pay a fair wage to all staff, and to ensure that staff working in the UK are paid at least the minimum wage.
11. Produce an annual written statement outlining the steps taken during the financial year, and plans for future actions, to ensure that slavery and human trafficking are not taking place in any part of our organisation and its supply chains. We will:



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DIRECTORS: A.M COPE, D. COPE, M. ROGERS, I.COPE



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- 11.1. Ensure that the statement is signed off at senior management/board level.
- 11.2. Publish the statement on our website. If this is not possible, we will provide a copy to anyone within 30 days of a request being made.

This policy is subject to annual review.

Signed: **Ian Cope**

Compliance Director

Charles Fellows Supplies Ltd

DATE: 10/08/2023



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