

Role	Responsible Person
HR Lead (Labour Standards)	Louise Workman
General Manager (Overall Accountability)	Nick Young

Scope of Responsibility

- Ensure compliance with the ETI Base Code and all applicable local labour legislation.
- Oversee the communication and implementation of ETI principles across the workforce and supply chain.
- Maintain and review company ethical trade policies on an annual basis.
- Monitor performance and report progress, issues, or non-conformances to the Senior Leadership Team.

1. Communication of the ETI Code to Workers**Procedure**

- The ETI Base Code is covered during induction training for all new employees.
- A copy of the ETI Code is displayed on site noticeboards in accessible locations.
- Annual refresher sessions/toolbox talks are delivered to all employees to reinforce awareness.
- Employees may request a copy of the ETI Code from HR at any time.
- Workers are provided with confidential channels (HR department, worker representative, grievance procedure) to raise any concerns or suspected breaches.

Supporting Evidence

- Induction materials (training slides, handbooks- agency/contractor/perm).
- Noticeboard photographs or posted copies of ETI Code.
- Pickstock Telford Website
- Attendance records from induction.

2. Communication of the ETI Code to Suppliers**Procedure**

- The ETI Code of Conduct is issued to all new suppliers during the onboarding process.
- Existing and new Suppliers are required to sign and return an acknowledgement confirming their understanding and commitment to compliance.
- The ETI Code will be included in supplier contracts and purchase order terms and conditions.
- Periodic reminders and updates are distributed via email or discussed in supplier review meetings.
- Suppliers are encouraged to cascade the ETI Code to their own subcontractors and sub-suppliers.

Supporting Evidence

- Copies of new supplier contracts including ETI clause.
- Signed supplier acknowledgements.
- Email communications or meeting minutes evidencing ETI discussions.

3. Supplier Code of Conduct

Pickstock Telford Ltd is committed to operating in line with the Ethical Trading Initiative (ETI) Base Code and requires all suppliers to demonstrate the same commitment throughout their operations and supply chains.

ETI Base Code Principles

- Employment is freely chosen.
- Freedom of association and the right to collective bargaining are respected.
- Working conditions are safe and hygienic.
- No child labour is employed.
- Living wages are paid.
- Working hours are not excessive.
- No discrimination is practised.
- Regular employment is provided.
- No harsh or inhumane treatment is allowed.

Supplier Responsibilities

- Communicate and cascade this Code to all subcontractors and sub-suppliers.
- Allow Pickstock Telford Ltd or its authorised representatives to verify compliance if requested.
- Notify Pickstock Telford Ltd immediately of any breaches, risks, or non-conformances identified.