



MiRiCal Emblems Ltd
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Ethical Trading Policy (ETI Base Code)

Introduction

MiRiCal Emblems Ltd recognises that our commercial activities have the potential to impact on our stakeholders – those individuals or groups who are affected directly or indirectly by our activities.

As a socially responsible company our stakeholders have a right to expect:

- Products manufactured and sourced by MiRiCal Emblems are produced under working conditions that are hygienic and safe.
- All workers involved in the production of MiRiCal Emblems products, from direct suppliers and subcontractors, through to our manufacturing site are treated with full consideration to their basic human rights.
- Our activities are carried out in ethical manner above and beyond basic legal requirements.

Base Code. For more information on the ETI Base Code please visit <https://www.ethicaltrade.org/eti-base-code>.

Our Commitment

This policy sets out MiRiCal Emblems' commitment to its stakeholders and the measures we are taking to ensure that we act in an ethical manner.

Employees – MiRiCal Emblems is committed to ensuring that our employment practices and the enforcement of corporate regulations ensure the protection of the rights of all those who work for us. In many areas we aim to operate above the minimum standards required by law to ensure our employees are safe, rewarded and valued. This is monitored and scrutinised through independent audits of our manufacturing site against the Ethical Trading Initiative Base Code.

Customers – MiRiCal Emblems is committed to demonstrating its ethical and social responsibility credentials to enable customers to make informed choices about whose services they purchase.

Suppliers – MiRiCal Emblems is committed to monitoring our supply chain, and we encourage our suppliers to operate to at least the same ethical standards we employ ourselves.

The below code of practice applies to staff directly employed by MiRiCal Emblems on temporary or permanent contracts and staff employed or provided by contractors or employment agencies to work on MiRiCal Emblems premises/sites or to undertake work for or on behalf of MiRiCal Emblems.

1. FREEDOM OF EMPLOYMENT

- Although not prevalent in our area of operation forced/bonded labour or involuntary prison labour will not be tolerated and used.
- Employees will never be asked to lodge identity papers or deposits and are free to leave their employment after reasonable notice is provided.

2. THE RIGHT TO COLLECTIVE BARGAINING AND FREEDOM OF ASSOCIATION ARE RESPECTED

- Employees are allowed to join or form Trade Unions, and to bargain collectively and will not be discriminated against or treated unfairly regardless of their Union status.
- MiRiCal Emblems adopts a fair and open attitude to the activities of Trade Unions and should local conditions restrict access to collective bargaining and freedom of association we will allow independent and free association and bargaining.

3. SAFE AND HYGIENIC WORKING CONDITIONS

- Employees shall be provided with a safe and hygienic working environment, bearing in mind the prevailing knowledge of the industry and any specific hazards.
- MiRiCal Emblems will take adequate and appropriate steps to prevent accidents and injury by minimising, so far as is reasonably practicable the cause of hazards inherent in the working environment.
- All employees shall receive regular and recorded health and safety training.
- All new employees will receive recorded health and safety training and a full site induction.
- All employees will be provided with access to clean toilet facilities, drinking water, and appropriate storage facilities for food and personal belongings.
- Overall responsibility for Health and Safety at MiRiCal Emblems is assigned to the Managing Director with day-to-day operational H&S compliance in the hands of the Production Director.

4. CHILD LABOUR

- Although not prevalent in our area of operation employment of child labour will not be tolerated and used.
- Persons under the age of 16 are not employed at MiRiCal Emblems any time, day or night.

5. WAGES

- MiRiCal Emblems will always pay its employees at a minimum the national legal standards.
- Before commencing employment, all employees shall be provided with written and understandable information about their employment conditions with respect to their wages.
- All employees will be given information about the particulars of their wages for the pay period concerned each time that they are paid.
- MiRiCal Emblems does not accept the practice of disciplinary deductions from wages.

- MiRiCal Emblems will not make any deductions from wages for amounts not provided for by national law without the express permission of the employee concerned.
- All disciplinary measures will be recorded and held on file.

6. WORKING HOURS

- Employees excluding overtime will not be expected or forced to work excess of 48 hours per week.
- Overtime shall be offered on a purely voluntary basis and used responsibly to cover peak production periods. Overtime will not be used to replace regular employment.
- All employees shall be provided with at least one day off for every seven-day period or where applicable 2 days off in every 14 day period.
- In very exceptional circumstances employees working hours may exceed 60 hours in a seven day period but this will be only be allowed with full agreement of the workers and where appropriate safeguards have been taken to protect the workers' health and safety.

7. DISCRIMINATION SHALL NOT BE PRACTICED

- Discrimination will not be tolerated in pay, hiring, compensation, access to training, promotion, termination of employment or retirement on the grounds of race, nationality, religion, age, disability, marital status, sexual orientation, union membership or political affiliation.
- Opportunities for personal and career development are equally available to all employees.

8. REGULAR EMPLOYMENT IS PROVIDED

- MiRiCal Emblems will unless unavoidable, provide regular employment based on a recognised employment relationship established through national law and practice.
- Labour only contracting, sub-contracting, home working and fixed-term contracts are not used as a means to avoid obligations under labour or social security laws.

9. NO HARSH OR INHUMANE TREATMENT IS ALLOWED

- MiRiCal Emblems will not tolerate any form of physical, verbal and sexual threats, abuse, harassment or intimidation. Evidence of this practice will be grounds for summary dismissal, if proved.

Communication

This Policy will be communicated directly to Directors, Management and all Employees, and included in the company's new starter induction pack, and employee handbook. A copy of the policy will also be posted on company notice boards and on our website.

Responsibilities

MiRiCal Emblems' Board of Directors has overall responsibility for all aspects of ethical trading at work within the business.

It is the responsibility of the whole senior management team (Customer Services, Production, Artroom, Quality Control, & Sales) to monitor their work activities and ensure they are carried out in an ethical manner in line with this policy.

The Production Director has overall responsibility for auditing the policy whether this being an internal audit or an external SMETA audit and will be the point of contact for the reporting any violation of this policy.

The Production Director will also be responsible for reporting to The Managing Director any policy non-conformances or incidents.

The Managing Director takes the responsibility for correcting any non-conformances with the Board of Directors copied in on all corrective actions and audit reports.

Each Employee also has a duty to cooperate with management so far as is necessary to enable the latter to fulfil its statutory obligations. This includes:

- Co-operating in the introduction and operation of all measures designed to fulfil management's obligations under this policy
- Drawing attention to actual or potential problems
- Suggesting ways in which ethical trading practices could be improved.

Reporting

If you have any questions about this policy or you would like to report a violation of this policy, then please contact the MiRiCal Emblems Production Director in the first instance.

We encourage all employees and others who have serious concerns about our work activities come forward and voice those concerns; there should be no fear of reprisal by anyone making a report.

MiRiCal Emblems will ensure all reports are taken seriously, are dealt with in a confidential manner and we will provide support throughout any investigation.

Review

This policy shall be reviewed on an annual basis and as and when necessary to reflect changes in relevant legislation and our approach.

Jonathan L. Dul
Managing Director

1st December 2021

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