

| POLICY | | |
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| Ethical Trading Policy | REF NO: POL 008 | FIRST ISSUE: 08/11/2013 |
| | REVISION DATE: 31/05/2021 | REV NO: 04 |

POLICY STATEMENT

DAM Structures Ltd (DAM) is committed to ensuring a high standard of ethical and environmental trade practices, including the provision of safe working conditions and the protection of workers' rights, across its business.

The organisation conducts its business in accordance with the provisions of the Ethical Trading Initiative Base Code, incorporating the Modern Slavery Act 2016, and expects its supply chain to observe the same provisions and demonstrate a similar commitment to an ongoing programme of ensuring and, where necessary, improving, ethical and environmental practices.

The policy compliance requirements, to be read and applied in conjunction with Core Requirements overleaf, comprise of:

- All employment is freely chosen
- Working conditions are safe and hygienic
- Child labour is not used
- Wages are fair and comparable to industry standard and always exceed the minimum wage
- Deductions from wages as a disciplinary measure shall not be permitted
- Working hours are not excessive
- No discrimination is practiced
- Regular employment is provided for those who are employed on a permanent contract
- No harsh, cruel or degrading treatment or practices are allowed
- No bribery, corruption, blackmailing or bullying is permitted

Policy Scope

This policy applies to all areas of DAM Structures' business and to its direct supply chain as well as to goods and services sourced by the organisation. It requires all direct Suppliers to observe the provisions of this policy and requires that such Suppliers, in turn, obtain similar compliance with its provisions from their suppliers.

All parties to whom this policy applies are required to comply with applicable national and international laws. Where the provisions of this policy afford greater protection than national law, the terms of this policy will prevail.

Signed:



Joshua Emerson (Managing Director)

Date:

31st May 2021

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Core Requirements (‘Critical Failure Points’)

DAM will not engage in business with suppliers who do not meet the organisations 10 Core Requirements and will be entitled to terminate any contract with any Supplier who is found to be non-compliant with any of the Core Requirements. Such termination on the part of DAM may be without notice and shall be without liability of any description on the part of DAM (whether to the supplier or any third party contracted by the supplier).

DAM’s Core Requirements are as follows:

1. Suppliers must not use any form of forced, bonded or involuntary labour, and workers must not be obliged to lodge identity papers or pay any deposit as a condition of work.
2. Workers must not be subject to physical or verbal abuse or threats or intimidation of any description.
3. Workers must not be required to work extreme hours or work without adequate rest periods.
4. Suppliers must not use workers under the age of 16, or the minimum legal working age in the country in question, if higher than 16. Suppliers must accept the principles of remediation of child and under age workers, and where such labour is discovered suppliers must establish and implement appropriate remediation for such workers and introduce effective systems to prevent the use of child labour in the future.
5. Factories and work sites used by suppliers must be safe and hygienic with an adequate number of safe and accessible fire exits from all buildings including living accommodation and workers must have access to drinking water.
6. Workers’ life or limb must not be endangered due to the use of dangerous machinery, unsafe building structure or layout, or hazardous chemicals. Where serious or fatal accidents have occurred suppliers must demonstrate to the satisfaction of DAM that all appropriate steps have been taken to prevent similar accidents occurring in the future.
7. Living accommodation, where provided, must be in buildings that are separate from other areas of the workplace and have an adequate fire alarm system.
8. Suppliers must pay wages which are fair and comparable to industry standard and always exceed the minimum wage.
9. Suppliers must maintain proper and accurate employment records including calculation of pay and hours worked and suppliers must be transparent and cooperative as regards the inspection of employment records.
10. Suppliers must not engage in bribery, corruption or other similar unethical practices in order to gain competitive advantage.