



By Appointment to Her Majesty The Queen
Suppliers of Liquefied Petroleum Gas
Calor Gas Limited Warwick



By Appointment to His Royal Highness The Prince of Wales
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CALOR

CALOR GAS LIMITED

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CALOR ETHICAL TRADING POLICY

1. Introduction

The core values by which Calor Gas Limited ("Calor") operates are:-

Taking care of our people, being good neighbours, fostering ethical business relationships and managing our environment.

As an internationally recognised business with suppliers the world over, we recognise that we have a duty to trade responsibly and have the potential to contribute to the implementation of good working standards in our supply chain.

2. Objective

We therefore want to ensure that those people with whom we deal, in particular our suppliers, live up to our values and standards and share that responsibility.

3. Scope

Accordingly, suppliers should comply with and seek to develop relationships with their own supply chains consistent with the principles set out below and should be compliant with all local laws and the following standards as a minimum.

4. Implementation of Standards

Calor expects its suppliers to operate within the following standards as part of its commitment to responsible supply chain management. These are based on internationally recognised standards set out in the UN Declaration of Human Rights and the International Labour Organisation ("ILO") Conventions covering core ILO standards and non-core ILO standards.

- **Employment is freely chosen**

There is no forced, bonded or involuntary prison labour. Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

- **Freedom of association and the right to collective bargaining are respected**

Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively. Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.

Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

- **Working conditions are safe and hygienic**

A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

Workers shall receive regular and recorded health and safety training and such training shall be repeated for new or reassigned workers.

Access to clean toilet facilities and to potable water and, if appropriate, sanitary facilities for food storage shall be provided. Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

The company observing the code shall assign responsibility for health and safety to a senior management representative.

- **Child labour shall not be used**

Companies shall develop or participate in and contribute to policies and programmes, which provide for the transition of any child found to be working for them, to enable the child to attend and remain at school to obtain full time education until no longer a child. There shall be no further recruitment of child labour.

Children and young persons under 18 shall not be employed at night or in hazardous conditions. Policies and procedures shall conform to the provisions of the relevant ILO standards.

In this Ethical Trading Policy a "*child*" means any person who is less than 15 years of age, unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age applies. If, however, local minimum age law is set at 14 years of age in accordance with developing country exceptions under ILO Convention 137, the lower age will apply.

In this Ethical Trading Policy a "*young person*" means any person over the age of a child as defined above and under the age of 18.

- **Wages meet expected standards**

Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be sufficient to meet basic needs and to provide some additional discretionary income.

All workers shall be provided with written and understandable information about their employment conditions (including those relating to wages) before they enter employment and about the particulars of their wages for the pay period concerned each time they are paid.

- **Working hours are not excessive**

Working hours comply with national laws and benchmark industry standards, whichever affords greater protection.

- **No discrimination is practiced**

There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

- **Regular employment is provided**

To every extent possible work performed must be on the basis of a recognised employment relationship established through national law and practice.

Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, subcontracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

- **No harsh or inhumane treatment is allowed**

Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

- **Confidentiality**

The confidentiality of information exchanged in the course of business must be respected and never be used for illegal purposes, or for individual gain. False information must not be given in the course of commercial negotiations.

- **No bribery or corruption will be tolerated**

The offering, paying, soliciting or accepting of bribes or kick-backs, including facilitation payments, is strictly prohibited.

A bribe may involve giving or offering any form of gift, consideration, reward or advantage to someone in business or government in order to obtain or retain a commercial advantage or to induce or reward the recipient for acting improperly or where it would be improper for the recipient to accept the benefit. Bribery can also take place where the offer or giving of a bribe is made by or through a third party, e.g. an agent, representative or intermediary.

Some examples of bribes are as follow. This is not an exhaustive list:

- Lavish gifts, meals, entertainment or travel expenses, particularly where they are disproportionate, frequent or provided in the context of on-going business negotiations;
- The uncompensated use of company services, facilities or property;

- Cash payments;
- Loans, loan guarantees or other credit;
- The provision of a benefit, such as an educational scholarship or healthcare, to a member of the family of a potential customer/public or government official;
- Providing a sub-contract to a person connected to someone involved in awarding the main contract; and
- Engaging a local company owned by a member of the family of a potential customer/public or government official.

Facilitation payments are small payments or fees requested by government officials to speed up or facilitate the performance of routine government action (such as the provision of a visa or customs clearance). Such payments are strictly prohibited.

Suppliers, representatives and their employees must comply with all applicable anti-bribery and corruption laws. If no such anti-bribery or corruption laws apply or are of a lesser standard to that prescribed in the UK Bribery Act 2010, suppliers, representatives and their employees must adhere to the UK Bribery Act 2010.

Suppliers and representatives shall have in place anti-corruption and bribery procedures designed to prevent employees or persons associated with its business from committing offences of bribery or corruption. Suppliers and representatives will properly implement these procedures into their business and review them regularly to ensure that they are operating effectively.

- **Environmental Management**

Calor supports and encourages operating practices and production systems that are suitable. The supplier, its representatives and agents will continually strive towards improving efficiency and sustainability of their operations which will include a recognised commitment to carbon reduction and water conservation programmes.

The following aspects of environmental management will be included in the supplier assessment:

- There should be a company environment representative.
- The company should be aware of and able to demonstrate compliance with all current legislation that may affect their activities.
- The company should conduct an environmental review and consider all aspects of their products and services and be able to demonstrate on-going measurement of their performance.
- Any enforcement, improvement or prohibition notices served on the site within the last three (3) years or served at any time during our on-going business relationship must be notified to Calor in a timely manner.

- **Quality**

Any goods supplied to Calor shall meet the standards set out in the contract between Calor and the supplier and at least of satisfactory design, quality, material and workmanship, be fit for any purpose held out by the supplier and its representatives or made known to the supplier and its representatives or for which they are commonly used and shall conform in all respects with any order and specification and/or patterns or samples supplied or advised by the supplier and its representatives.

Any services supplied to Calor shall be provided by appropriately qualified and trained personnel, with due care and diligence, to such high standard of quality as is reasonable for us to expect in all circumstances and shall conform in all respects with any specification provided.

5. Monitoring and Independent Verification

Calor is a member of Sedex: a non-profit making membership organisation dedicated to driving improvements in ethical and responsible business practices in global supply chains. Calor evaluates credentials of all its major suppliers on an on-going basis and uses Sedex as a supplier management tool.

6. Audit and Termination of Agreements

Calor reserves the right to verify every suppliers and its representatives' and agents' compliance with this Ethical Trading Policy.

Where the supplier, its representatives and agents complete reviews and audits that demonstrate shortcomings in any of the above areas, the supplier, its representatives and agents must strive to implement a time-bound programme of improvement (including remediation) leading to full compliance with this Ethical Trading Policy.

If Calor becomes aware of any actions of a supplier or any of its representatives or agents or of any conditions relating to them that are not in compliance with this Ethical Trading Policy, it reserves the right to require corrective actions from the supplier and/or its representatives or agents which shall on request by Calor implement a time-bound programme of improvement (including remediation) leading to full compliance with this Ethical Trading Policy.

Calor additionally reserves the right to terminate its agreement with any supplier whose representatives or agents do not comply with this Ethical Trading Policy.



Matthew Hickin

CEO

**Calor Gas
Limited**

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