



ETHICAL TRADING POLICY

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Summary Statement

At the UBC Chemical, we strongly believe in ethical principles and good stewardship. Where possible we trade according to the following Ethical Trading Criteria:

1. All employment is freely chosen
2. Working conditions are safe and hygienic
3. Child labour is not used
4. Wages are fair and comparable to industry standard and will always exceed the minimum wage.
5. Deductions from wages as a disciplinary measure shall not be permitted
6. Working hours are not excessive
7. No discrimination is practised
8. Regular employment is provided for those who are employed on a permanent contract.
9. No harsh, cruel or degrading treatment or practices are allowed
10. No bribery, corruption, blackmailing or bullying is permitted.
11. Third party suppliers and buyers are both free to sell and buy from any number of other businesses. No restrictions, as a way of guaranteeing business are allowed

1. Our Full Ethical Trade Policy Statement Policy Statement

UBC Chemical recognises that our commercial activities have potential to impact on our suppliers and our locality.

As a socially responsible small business our suppliers, local community and customers have the right to expect:

- Products sourced by UBC Chemical are produced under working conditions that are hygienic and safe.
- All workers involved in the delivery of services provided UBC Chemical are treated with full consideration to their basic human rights.
- UBC Chemical acts in an ethical manner above and beyond basic legal requirements
- UBC Chemical is committed to implementing the principles of the Ethical Trading Initiative Base Code, it's also a member of SEDEX (ZC419141319)
- UBC Chemical's commitment to its suppliers, service providers and customers.
- UBC Chemical recognises that our ethical and social performance and reputation is a key part of our overall commercial success

Employees

UBC Chemical 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. As we of course expand and become larger we will be able to offer more opportunities for our



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staff. We establish recognised relationships with our employees in accordance with existing legislation in Turkey or in any Country where we are obtaining products or sub-contracting. All employees are provided with an easy to read, formal contract of employment with particular clarity in relation to wages.

Customers

UBC Chemical is committed to demonstrating its ethical and social responsibility credentials to enable customers to make informed choices about whose services they purchase.

Suppliers

UBC Chemical is committed to monitoring social standards in our supply chain and we encourage our suppliers to operate the same ethical standards we employ ourselves.

2. UBC Chemical Ethical Trading Code of Practice

This code of practice applies to:

- Staff directly employed by the UBC Chemical on temporary or permanent contracts.
- Staff employed or provided by contractors or employment agencies to work on the UBC Chemical's premises or to undertake work on behalf of the UBC Chemical
- No forced, bonded or involuntary labour shall be used.
- All employment with the UBC Chemical is freely chosen.
- Staff are not required to lodge deposits or identity papers with us.
- Staffs are free to leave UBC Chemical after serving reasonable notice as set out in their contract of employment
- Where fees have been paid by workers or where identity papers have been retained, repayment of fees or the return of the papers must be effected in a timely manner

3. Child Labour

In principal UBC Chemical is against the use of child labour and believes its long-term elimination is ultimately in the best interests of children.

UBC Chemical will not employ children or young persons under 18. All workers must have reached the age of 18, or have reached the minimum legal working age under national law, whichever age is the higher.

Young person refers to any worker over the age of a child, as defined above, under the age of 18.

4. Working conditions are safe and hygienic

- A senior member of staff is assigned responsibility for Health and Safety within the Company.
- The Company takes adequate measures to prevent accidents and minimise potential hazards
- Staff receive regular health and safety training and have access to the Health and Safety Policy
- The nominated management representative regularly monitors compliance with the Health and Safety Policy.
- Appropriate PPE is provided to all employees who require them at no cost to the individual.



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- Staffs have unrestricted access to welfare, toilet facilities and drinking water and are entitled to regular breaks.
- UBC Chemical has a published Health & Safety Policy.

5. Working hours and remuneration are reasonable and comparable to other companies in our sector and regular employment is provided.

- Staff pay rates are above the national legal minimum standards
- Staff are not forced to work in excess of 45 hours per week
- Staff are provided 2 days off per week
- Staff are given written terms and conditions of employment that details the employment relationship between and the respective obligations of the employee and the employer, rates of pay, working hours, grievance and disciplinary procedures, holiday entitlement, absence and sick pay rules and notice periods for termination of employment.
- No deductions are made from wages as a disciplinary measure and pay slips detailing lawful deductions are provided for each pay period.
- Labour only, contracting, sub-contracting and fixed term contracts are not used as a means to avoid obligations under labour or social security laws

6. No discrimination is practised:

- There is no discrimination in pay, hiring, compensation, access to training, promotion and 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.
- No harassment, threats, abuse or intimidation shall be practised. Physical, verbal and sexual threats, abuse, harassment or intimidation is expressly prohibited and grounds for summary dismissal, if proved.

7. Organisation

UBC Chemical's Directors have overall responsibility for all aspects of ethical trading at work within the business.

Confirmed by UBC Chemical :

Burak Erenoğlu

CEO,