



Ethical Trading Policy

Monitor Group are committed to conducting our business ethically and responsibly. We recognise the importance of our role in ensuring fair and sustainable working practices across our operations. Our Ethical Trading Policy reflects our commitment to maintaining high standards of integrity, respect, and fairness for our employees, customers, suppliers, and the communities we serve.

This policy is built on the principles outlined in the UK Modern Slavery Act, the Ethical Trading Initiative (ETI) Base Code, and other relevant UK employment and human rights legislation.

2. Scope of the Policy

This policy applies to:

- All employees, whether full-time, part-time, temporary, or contracted.
- Suppliers, contractors, and subcontractors engaged with the company.
- Clients and other stakeholders with whom we interact.

3. Core Principles

3.1. Human Rights and Employment Standards

We uphold the following key employment rights and human rights principles in all of our operations and expect our supply chain partners to do the same. We will actively monitor our supply chain to ensure compliance with these principles. Regular risk assessments, audits, and supplier self-assessments will be conducted to ensure that suppliers meet our ethical standards. Any supplier found to be in breach of these standards will be required to take immediate corrective action, and non-compliance may result in the termination of our business relationship. This commitment extends to ensuring that all workers, whether directly employed by Monitor Group or engaged through our suppliers, subcontractors, or partners, are treated fairly, with dignity, and in compliance with applicable laws.

- **No Forced or Child Labour:** We strictly prohibit any form of forced, bonded, or child labour, within our own operations and throughout our supply chain, in line with the Modern Slavery Act 2015.
- **Fair Wages:** All employees will be paid a fair wage that meets or exceeds the National Minimum Wage and Living Wage standards, with no unlawful deductions.
- **Working Hours:** We ensure that working hours comply with applicable UK law and that employees are entitled to appropriate rest periods, paid holiday, and overtime pay where relevant.
- **Freedom of Association:** We respect the right of employees to join, form, or participate in trade unions or other collective bargaining groups.

Further information can be found in our separate Modern Slavery policy.

3.2. Health and Safety

The safety and well-being of our employees is paramount. We are committed to providing a safe, hygienic, and healthy working environment that complies with all UK health and safety legislation. Employees will be given adequate training and resources to maintain health and safety standards at work.

Further information can be found in our separate Health and Safety policy.

3.3. Equality and Diversity

We value diversity and are committed to ensuring equal opportunities for all. Discrimination based on race, gender, age, disability, religion, sexual orientation, or any other protected characteristic is strictly prohibited. All employees will be treated with dignity and respect, promoting an inclusive workplace.

Further information can be found in our separate Equality and Diversity policy.

3.4. Environmental Responsibility

We are committed to reducing our environmental impact. We actively seek to minimise waste, energy consumption, and the use of harmful chemicals in our cleaning processes. Where possible, we will use eco-friendly products and practices to ensure sustainability across our services.

Further information can be found in our separate Sustainability and Environmental policies.

3.5. Supply Chain and Procurement

We recognise our responsibility to ensure ethical practices within our supply chain. We will work with suppliers and subcontractors who align with our ethical values and standards. We expect them to:

- Demonstrate a commitment to ethical and sustainable business practices.
- Operate in an environmentally responsible manner.

Suppliers will be monitored and evaluated on their ethical performance, and non-compliance will be addressed through corrective actions or termination of contracts if necessary.

4. Anti-Bribery and Corruption

We maintain a zero-tolerance policy towards bribery and corruption. All employees, suppliers, and subcontractors must comply with the UK Bribery Act 2010 and other applicable laws. We will not engage in or accept any form of corruption, bribery, or unethical conduct in any of our business dealings.

Further information can be found in our separate Anti Bribery and Corruption policy.

5. Confidentiality and Data Protection

We respect the privacy of our employees, clients, and business partners. All personal and sensitive data will be handled in compliance with the General Data Protection Regulation (GDPR) and other applicable data protection laws. Confidentiality will be maintained, and information will only be used for legitimate business purposes.

Further information can be found in our separate Data Protection policy.

6. Monitoring and Compliance

We are committed to ensuring that this Ethical Trading Policy is fully implemented and adhered to by all stakeholders. The following measures will be taken to monitor compliance:

- Regular internal audits of working practices, employee welfare, and supply chain operations.
- Providing training and support to employees on ethical trading standards and practices.

Encouraging open communication and a whistleblowing process for employees to report unethical behaviour without fear of retaliation. Further information can be found in our separate whistleblowing policy.

7. Continuous Improvement

We are dedicated to continuously improving our ethical standards and practices. We will review this policy annually to ensure it remains relevant and in line with current legislation, best practices, and the evolving expectations of our clients, employees, and the wider community.



Angus Henry
Managing Director

10th June 2024