



ISO 9001:2015 – 4.2

Centerprise Group Ethical Trading Policy

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Document Classification:	Public

Document No

QM 001.5

Rev

8

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Date

02/09/2025

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Approvals

The signatures below certify that this policy has been reviewed and accepted and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision.

	Name	Signature	Position	Date
Prepared by	Chris Hunt		Group Quality Manager	02/09/2025
Reviewed and approved by	Amanda Harris		Support Operations Director – Asset Management	03-Sep-2025
Reviewed and approved by	Sharon Allen		Group Finance Director	03-Sep-2025
Reviewed and approved by	Sam Lailey		Group HR and Support Director	03-Sep-2025
Approved by	Jeremy Nash		CEO	03-Sep-2025

Amendment Record

This Policy is reviewed to ensure its continuing relevance to the systems and process that it describes. A record of contextual additions or omissions is given below:

Page No.	Context	Revision	Date
3, 7, 11	Document Review, inclusion of reference to supporting documentation, environment and sustainability, additional paragraphs to improvement	5	17/05/2019
3,	Review of Document, Change of title of QM001.7	6	27/01/2023
3, 9, 12	Review of Document, Inclusion of ISO 14001 and ISO 45001 supporting documents, Inclusion of 3.5 Trade Law Compliance, Introduction of Statutory and legal obligations,	7	04/04/2025
9, 12	Amendment to Clause 3.5 to Trade Law Compliance and inclusion of US legislation	8	02/09/2025

Supporting documentation:

Ref	Title & Description	
QM001	Quality Management Manual	ISO 9001:2015
QM001.4	Group Equality and Diversity Policy	ISO 9001:2015
QM001.7	Environmental Social Governance Policy	ISO 9001:2015
QM001.8	Centerprise Group Anti-Slavery and Human Trafficking Policy	ISO 9001:2015



QM001.11	Centerprise Group Supplier Code of Conduct	ISO 9001:2015
QM003	Environmental Management System	ISO 14001:2015
QM003.0A2	Environmental Policy	ISO 14001:2015
QM006	Occupational Health and Safety Manual	ISO 45001:2018
QM006.1	H&S Policy Statement	ISO 45001:2018
	Staff Handbook	

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1. Centerprise Group Ethical Trading Policy Statement

Summary Statement

At Centerprise International Ltd, we believe strongly in ethical principles. We are therefore proud to operate, wherever possible, and follow the Ethical Trading Criteria:

1. All employment is freely chosen.
2. Working conditions are safe and hygienic.
3. Child labour is not used.
4. Wages and fair and competitive to industry standards 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 tolerated.
10. No Bribery, corruption, blackmailing or bullying is tolerated.
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.
12. Sustainability and Environment.

We also ask all our suppliers to affirm in writing to us that their businesses are also built on these ethical criteria.

2. Our Full Ethical Trade Policy Statement

1. Policy Statement

Centerprise International Ltd recognises that our commercial activities have the potential to impact on our suppliers and our locality

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

- Products manufactured and sourced by Centerprise International Ltd are produced under working conditions that are hygienic and safe.
- All workers involved in the delivery of services by Centerprise International Ltd are treated with full consideration to their basic human rights.
- Centerprise International Ltd acts in an ethical manner above and beyond basic legal requirements.
- Centerprise International Ltd is therefore committed to implementing the principles of the Ethical Trading Initiative (ETI) Base Code (Although we are not members of the ETI).
- This policy sets out Centerprise International Ltd commitment to its suppliers and customers by setting out the measures we are taking to ensure that we are acting in an ethical manner.

2. Centerprise International Ltd is committed to its Suppliers, Service Providers and Customers

Centerprise International Ltd recognises that our ethical and social performance and reputation is a key part of our overall commercial success.

2.1 Employees

Centerprise International Ltd 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.

2.2 Customers

Centerprise International Ltd is committed to demonstrating its ethical and social responsibility credentials to enable customers to make informed choices about who services they purchase.

2.3 Suppliers

Centerprise International Ltd is committed to monitoring social standards in our supply chain, and we encourage our suppliers to operate to the same ethical standards that we employ ourselves.

3. Centerprise International Ltd Ethical Trading Code of Practice

3.1 The Code of Practice applies to:

- Staff directly employed by Centerprise International Ltd on temporary or permanent contracts.
- Staff employed or provided by contractors or employment agencies to work on Centerprise International Ltd premises or to undertake work for or on behalf of Centerprise International Ltd.

3.2 No forced, bonded or involuntary labour shall be used:

- All employment with Centerprise International Ltd is freely chosen.
- Staff are free to leave Centerprise International Ltd after reasonable notice.

3.3 No child labour shall be used:

- There shall be no recruitment of child labour.
- Children or persons under the age of 16 are not employed at any time, day or night.

3.4 Conflict Minerals

Centerprise International Ltd supports the ending of violence and human rights violations in the mining of minerals from the area known as the “Conflict Region” in the east of the Democratic Republic of Congo (DRC) and surrounding countries.

Centerprise International Ltd will not knowingly purchase products that contain conflict minerals that directly or indirectly finance, or benefit armed groups in the DRC or adjoining countries. Centerprise International Ltd expects its suppliers of electronic products to only source minerals from responsible sources.

3.5 Trade Law Compliance

Centerprise International Ltd will not knowingly sell, export or re-export the Products, directly or indirectly, to businesses or countries that are subject to UK trade sanctions. Furthermore, we will not sell products originating from a US entity to any person or organisation subjected to US Sanctions. As applicable to either UK or US sanctions, this includes compliance with arms embargoes and other trade restrictions, financial sanctions, including asset freezes, immigration sanctions, known as travel bans or aircraft and shipping sanctions, including de-registering or controlling the movement of aircraft and ships, as described on the Government Website.

Due diligence will be carried out to ensure that the Products sold are and will solely be used for their intended purposes and are not and will not be used for, or in connection with, any illicit purposes. Centerprise International Ltd will not, directly or indirectly, provide the Products to any natural or legal person, entity or body that is subject to sanctions or any other restrictions under the Trade Laws.

As part of Centerprise International Limited ‘Onboarding Process’, new suppliers are checked against both the Government UK Sanctions lists ([The UK Sanctions List - GOV.UK](#)) and where applicable US Sanctions List ([Sanctions List Search](#)).

The Quality Manager as part of the ongoing check on the ‘Top 30 Vendors’ will conduct quarterly checks against the Governments portal. As a subscriber to the Government UK Sanctions List, the Quality Manager will on receipt of a notification, check with the Purchasing Department to see whether any supplier is listed and take appropriate action.

4. Working conditions are safe and hygienic

Centerprise International Ltd takes adequate measures to prevent accidents and minimise potential hazards by:

- Staff receiving regular health and safety training.
- Staff having unrestricted access to toilet facilities and drinking water.
- Centerprise International Ltd has a published Health and Safety Policy.

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

Centerprise International Ltd ensures that:

- Staff pay rates are above the national legal minimum standards
- Staff are given written terms and conditions of employment that detail the:
 - Employment relationship between the respective obligations of the employee and employer.
 - Rates of pay.
 - Working Hours.
 - Grievance and disciplinary procedures.
 - Holiday entitlement.
 - Absence and sick pay rules.
 - 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.
- 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.

7. No Harassment, threats, abuse or intimidation shall be tolerated.

Physical, verbal and sexual threats, abuse, harassment or intimidation will not be tolerated and grounds for summary dismissal, if proved.

8. Employment Agencies

Employment Agencies contracted to supply temporary staff shall:

- Demonstrate commitment to and application of the requirements of this code
- Ensure that all staff supplied to Centerprise International Ltd are eligible to work in the UK by:
 - Following Immigration and Nationality Directorate Guidelines on Amendments to Section 8 of the Asylum and Immigration Act 1996.
 - Ensuring that the requirements of the Immigration and Asylum Act 1999 Section 22 Code of Practice are met.
 - Retaining copies of identity papers, work permits, or passport stamps as detailed in the Home Office List of Specified Documents and UK Passport Stamps.
- Ensure that all staff supplied to Centerprise International Ltd have sufficient command of English to understand:
 - The agency's responsibility under this code of practice.
 - Centerprise International Ltd Health and Safety requirements.
 - Written statements of employment particulars.

Or to have other measures in place to ensure that all these requirements are communicated in the employee's native language.

9. Environment

Ensuring we act in a responsible, sustainable way is an essential part of how we work. Our Environment Policy states our commitment to meeting, or improving on, legal and regulatory environmental requirements and applicable codes of practice. Our Environmental Management System meets ISO 14001 standards and extends into our supply chain through our environmental audits of suppliers and development of improvement plans

Through our Supplier Questionnaire, we encourage our suppliers to adopt similar standards to minimise impact on the environment, minimise excessive secondary packaging and reduce waste to landfill. Our supplier selection process includes careful application of environmental criteria ensuring adherence to legal requirements and best practice

We will actively select our suppliers to reduce the environmental footprint of our extended supply chain.

A key consideration is to source locally so that we can reduce carbon miles, support local businesses and actively encourage community investment.

10. Transparency

We will strive to be open and honest when we work with others and ensure reporting is fair and transparent.

11. Organisation

Centerprise International Ltd Directors have overall responsibility for all aspects of ethical trading at work within the business.

12. Statutory and Legal Requirements:

Centerprise International adheres to the following statutory and legal requirements:

- Modern Slavery Act 2015: We are committed to preventing modern slavery and human trafficking in our business and supply chains. We conduct regular risk assessments and audits to ensure compliance.
- Equality Act 2010: We promote equality and diversity within our workforce and ensure non-discriminatory practices in recruitment, promotion, and employment conditions.
- Health and Safety at Work Act 1974: We ensure a safe working environment for all employees, complying with health and safety regulations and conducting regular safety audits.
- Environmental Protection Act 1990: We are committed to minimising our environmental impact through sustainable practices and compliance with environmental regulation
- UN Global Compact: We are committed to adhering to the 10 UN Principles that cover: Human Rights, Labour, Environment and Anti-corruption.
- UK Trade law Compliance: We will comply with the UK Trade Bill and the Taxation (Cross-border Trade) Act.
- Office of Foreign Assets Control (OFAC) regulations
- U.S. Export Administration Regulations (EAR) export controls and sanctions laws

13. Looking towards further improvement

We encourage and support continuous improvement in supplier standards and we regularly measure supplier improvement. We recognise our suppliers may need time and support to ensure compliance, however, all our suppliers must demonstrate that any breach of our Ethical Trading Policy is addressed in appropriate timescales.

Where we are alerted to breaches of our Policy, we will take action considered appropriate. If suppliers are unable or unwilling to address critical issues associated with any breach of our Policy within a prescribed timescale, we reserve the right to terminate the relationship in accordance with our contractual rights.

Centerprise International Ltd is keen to learn from others and would ask if anyone has any ideas or feedback regarding our policy or practice to contact us.