

Ethical Conduct Policy

At Albert Harrison & Co Ltd we are committed to doing the right thing in all aspects of our business. This requires that every day everyone working for us needs to have an unwavering dedication to the highest ethical standards. It is fundamental that every employee and worker carries a share of the responsibility for our conduct and contributes to our success.

Our culture is built on four key values. These shape our behaviour toward customers and toward one another. Together, they drive our organisation forward. The values are:

INTEGRITY

We demand of each other and ourselves the highest standards of individual and corporate integrity. We do the right thing, because it is the right thing to do. It is every employee's responsibility to safeguard organisation assets and foster an environment of trust with our workers, customers, communities and suppliers. We should always comply with all our organisation policies, meet legal requirements, and create an environment of transparency in which all reporting requirements are met.

EXCELLENCE

We routinely challenge ourselves to improve our products, services and processes. We strive always to understand our customers' businesses and help them achieve their goals. We serve our customers by anticipating and responding to their needs. We are dedicated to diversity, fair treatment, mutual respect and trust. We are committed to producing products and serving our customers with zero harm to people and the environment.

TEAMWORK

We foster an environment that encourages innovation and creativity, and delivers results through collaboration. We practice leadership that teaches, inspires and promotes full participation and career development. We encourage open and effective communication and interaction with all workers and stakeholders, actively working together to keep each other safe and in good health. We believe that none of us is as capable or effective as all of us – and together, there's no limit to what we can achieve.

ACCOUNTABILITY

We honour the commitments we make and take personal responsibility for all actions and results. Our actions match our words, and we demand responsibility – from ourselves and others – in everything we do. We operate on the basis that continuous improvement is an integral part of our culture.

Regardless of our position within the organisation, we share equal accountability for:

- Conducting business with integrity, preserving our strong reputation and expanding our position in the marketplace.
- Fostering an inclusive culture in which we all feel respected and have the opportunity to reach our full potential.
- Providing a healthy and safe work environment, and complying with applicable environmental laws and regulations wherever we operate around the world contributes to the sustainability of the communities in which we live and work.

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Modern Slavery Statement

A. ORGANISATION

This statement applies to Albert Harrison & Co Ltd (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year 2024 / 2025.

Albert Harrison & Co Ltd operates from a single facility located at Unit 14A, Meadway, Shuttleworth Mead Business Park, Padiham, Burnley, BB12 7NG. The company is managed by a Board of Directors comprising the two business owners.

Our core activities include stock holding and distribution to key UK clients. Customer orders are managed through our sales office and company ordering portal, with distribution handled by third-party providers, as the company does not own any delivery vehicles. Demand remains consistent throughout the year.

All labour supporting our operations is based entirely in the UK at our single facility.

DEFINITIONS

The Organisation considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restrictions placed on freedom of movement.

COMMITMENT

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom and in many cases exceeds those minimums in relation to its employees.

SUPPLY CHAINS

In order to fulfil its activities, the Organisation's main supply chains include those related to all products distributed into Albert Harrison & Co Ltd from various suppliers within the United Kingdom. We understand that the Organisations first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

POTENTIAL EXPOSURE

The Organisation considers its main exposure to the risk of slavery and human trafficking to exist in its lower-tier supply chains because they involve the provision of labour in a country where protection against breaches of human rights may be limited.

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In general, the Organisation considers its exposure to slavery / human trafficking to be relatively limited, nonetheless it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

STEPS

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- reviewing supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery;
- measures in place to identify and assess the potential risks in the supply chains;
- undertaking impact assessments of our services upon potential instances of slavery;
- creating action plans to address risk to modern slavery;
- any actions taken to embed a zero tolerance policy towards modern slavery;

KEY PERFORMANCE INDICATORS

The Organisation has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Organisation or its supply chains.

- Regular supplier reviews to understand their progress with regards to the policies they have in place

POLICIES

The Organisation has the following policies which further define its stance on modern slavery:

- Anti-Slavery Policy
- Corporate Social Responsibility Policy
- Supplier Code of Conduct

TRAINING

The Organisation provides training to staff to effectively implement its stance on modern slavery, this involves induction training for every new employee on modern slavery policies.

SLAVERY COMPLIANCE OFFICER

The Organisation has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval: 24.06.25

Signed: *Paul Sanderson*
Managing Director

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Equality & Diversity Policy

A) INTRODUCTION

We are an equal opportunities employer. We are committed to equality of opportunity and to providing a service and following practices which are free from unfair and unlawful discrimination. The aim of this policy is to ensure that no applicant or member of staff receives less favourable treatment on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation, or is disadvantaged by conditions or requirements which cannot be shown to be relevant to performance. It also seeks to ensure that no person is victimised or subjected to any form of bullying or harassment.

The terms equality, inclusion, diversity and equity are at the heart of this policy. 'Equality' means ensuring everyone has the same opportunities to fulfil their potential free from discrimination. 'Inclusion' means ensuring everyone feels comfortable to be themselves at work and feels the worth of their contribution. 'Diversity' means the celebration of individual differences amongst the workforce. 'Equity' means recognising barriers and that some groups are more advantaged than others, and putting measures in place to eliminate these barriers, ensuring equal opportunities for all. We will actively support diversity, equity and inclusion and ensure that our workforce is valued and treated with dignity and respect. We want to encourage everyone in our business to reach their potential.

We value people as individuals with diverse opinions, cultures, lifestyles and circumstances. All employees are covered by this policy and it applies to all areas of employment including recruitment, selection, training, deployment, career development, and promotion. These areas are monitored and policies and practices are amended if necessary to ensure that no unfair or unlawful discrimination, intentional, unintentional, direct or indirect, overt or latent exists.

The Managing Director has particular responsibility for implementing and monitoring the Equality and Diversity Policy and, as part of this process, all personnel policies and procedures are administered with the objective of promoting equality of opportunity and eliminating unfair or unlawful discrimination.

All employees, workers or self-employed contractors whether part time, full time or temporary, will be treated fairly and with respect. Selection for employment, promotion, training, or any other benefit will be on the basis of aptitude and ability. All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the Company.

Equality of opportunity, valuing diversity and compliance with the law is to the benefit of all individuals in our Company as it seeks to develop the skills and abilities of its people. While specific responsibility for eliminating discrimination and providing equality of opportunity lies with managers and supervisors, individuals at all levels have a responsibility to treat others with dignity and respect. The personal commitment of every employee to this policy and application of its principles are essential to eliminate discrimination and provide equality and equity throughout the Company.

B) OUR COMMITMENT AS AN EMPLOYER

- 1) To create an environment in which individual differences and the contributions of our staff are recognised and valued.
- 2) Every employee, worker or self-employed contractor is entitled to a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.
- 3) We will recruit and retain diverse talent by ensuring that diversity and inclusion are central to our recruitment, training and development practices.
- 4) Training, development and progression opportunities are available to all staff.

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- 5) We recognise that equality and diversity in the workplace is good management practice and makes sound business sense.
- 6) We will take steps to ensure equity amongst our workforce such as ensuring that our vacancies are advertised to a diverse range of potential candidates and, where relevant, to particular groups that have been identified as disadvantaged or underrepresented in our Company, taking positive action to recruit disabled people and ensuring there are no unlawful barriers to accessing our employment opportunities, training, progression opportunities, benefits and facilities.
- 7) Diversity in our workforce will be regularly monitored to ensure equal opportunities throughout the Company. Where appropriate, measures will be taken to identify and remove unnecessary obstacles and to meet the special needs of disadvantaged or underrepresented groups.
- 8) We will review all our employment practices and procedures to ensure fairness.

C) OUR COMMITMENT AS A SERVICE PROVIDER

- 1) We aim to provide services to which all clients are entitled regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation, offending past, caring responsibilities or social class.
- 2) We will make sure that our services are delivered equally and meet the diverse needs of our service users and clients.
- 3) We will take steps to ensure equity amongst our clients and service users such as removing any unlawful obstacles to accessing our services or facilities. Where appropriate, measures will be taken to identify and remove unnecessary barriers and to meet the special needs of disadvantaged or underrepresented groups.
- 4) This policy is fully supported by senior management and has been agreed with employee representatives.
- 5) This policy will be monitored and reviewed annually.
- 6) We have clear procedures that enable our clients, candidates for jobs and employees to raise a grievance or make a complaint if they feel they have been unfairly treated.
- 7) Breaches of our Equality and Diversity Policy will be regarded as misconduct and could lead to disciplinary proceedings.

D) POLICY STATEMENTS

AGE

We will:

- ensure that people of all ages are treated with respect and dignity;
- ensure that people are given equal access to our employment, training, development and promotion opportunities; and
- challenge discriminatory assumptions about younger and older people.

DISABILITY

We will:

- provide any reasonable adjustments to ensure disabled people have access to our services and employment opportunities;

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- challenge discriminatory assumptions about disabled people; and
- seek to continue to improve access to information by ensuring availability of loop systems, braille facilities, alternative formatting and sign language interpretation.

RACE

We will:

- challenge racism wherever it occurs;
- respond swiftly and sensitively to racist incidents; and
- actively promote race equality in the Company.

GENDER

We will:

- challenge discriminatory assumptions about gender;
- take positive action to redress the negative effects of discrimination against everyone;
- offer equal access for everyone to representation, services, employment, training and pay and encourage other organisations to do the same; and
- provide support to prevent discrimination against transgender people who have or who are about to undergo gender reassignment.

SEXUAL ORIENTATION

We will:

- ensure that we take account of the needs of everyone, including the LGBTQ+ communities; and
- promote positive images of the LGBTQ+ communities.

RELIGION OR BELIEF

We will:

- ensure that employees' religion or beliefs and related observances are respected and accommodated wherever possible; and
- respect people's beliefs where the expression of those beliefs does not impinge on the legitimate rights of others.

PREGNANCY OR MATERNITY

We will:

- ensure that people are treated with respect and dignity during pregnancy and during maternity leave;
- challenge discriminatory assumptions about pregnancy and maternity leave; and
- ensure that no individual is disadvantaged as a result of pregnancy or maternity leave and that we take account of the needs of our employees during pregnancy and during maternity leave.

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MARRIAGE OR CIVIL PARTNERSHIP

We will:

- ensure that people are treated with respect and dignity and that a positive image is promoted regardless of marriage or civil partnership;
- challenge discriminatory assumptions about the marriage or civil partnership of our employees; and
- ensure that no individual is disadvantaged as a result of their marriage or civil partnership status.

EQUAL PAY

We will:

- ensure that all employees have the right to the same contractual pay and benefits for carrying out the same work, work rated as equivalent work or work of equal value.

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Child Labour

The Company will ensure that all relevant legislation and restrictions are adhered to in regard to the use of young workers. We will ensure that the necessary checks are carried out to verify an individual's age and right to work, and that relevant Health and Safety codes are adhered to.

Where required, the Company will ensure that the relevant employment permit is received from the education department of the local council.

We will also carry out spot checks when required and will retain copies of age records within the place of work.

RESTRICTIONS FOR CHILDREN AGED 14 YEARS OLD

There are restrictions that apply to the employment of children aged 14 years old, as follows:-

- They must not work before 7.00 am. or after 7.00 pm. on any day;
- They must not work for more than 2 hours on any day when they are required to be at school;
- They must not work during school hours;
- They must not work for more than 5 hours on a Saturday or on weekdays during school holidays;
- They must not work for more than 2 hours on a Sunday;
- They must not work for more than 4 hours in any day without a rest break of 1 hour.
- They must not work for more than 12 hours in any school week; and
- They must not work for more than 25 hours a week during school holidays.

RESTRICTIONS FOR CHILDREN AGED 15 AND 16 YEARS OLD

There are restrictions that apply to the employment of children aged 15 and 16 years old, as follows:-

- They must not work before 7.00 am. or after 7.00 pm. on any day;
- They must not work for more than 2 hours on any day when they are required to be at school;
- They must not work during school hours;
- They must not work for more than 8 hours on a Saturday or on weekdays during school holidays;
- They must not work for more than 2 hours on a Sunday;
- They must not work for more than 4 hours in any day without a rest break of 1 hour.
- They must not work for more than 12 hours in any school week; and
- They must not work for more than 35 hours a week during school holidays.

RESTRICTIONS FOR YOUNG WORKERS OVER COMPULSORY SCHOOL LEAVERS AGE

There are restrictions that apply to the employment of young workers over compulsory school leaver's age, as follows:-

- They must not work for more than 8 hours a day;
- They must not work for more than 40 hours a week;
- They must not work for more than 4.5 hours in any day without a rest break of 30 minutes.
- They must have a rest period of not less than 48 hours in each seven day period.