



Ethical Trading and Human Rights Policy

Introduction

Northern Diver have examined our responsibilities and our preferences when sourcing materials from suppliers and potential suppliers. As a result of this review we have produced this Ethical Trading and Human Rights Policy, which is supported by the whole Board has been guided by both industry and international standards. It is required in order to uphold the reputation of the company with its stakeholders.

The policy covers the main issues that may be encountered in relation to product sourcing and sets out the standards of professionalism and integrity which should be maintained by individuals in the company worldwide. Any doubts or uncertainties about ethical sourcing issues can be resolved in the first instance by contacting management for guidance.

This Policy expresses the standards concerning; safe and fair working conditions for employees, responsible management of social and environmental issues within the Company and the international supply chain.

As a company we support organisations in upholding human rights principles, wherever we operate. Although there is no definitive consensus on the boundaries of corporate responsibility in respect of human rights, we need to ensure that we are not involved in human rights violations, either directly or indirectly and that we operate in accordance with the Universal Declaration of Human Rights (UDHR) and take account of other internationally accepted human rights standards, e.g.: the International Labour Organisation (ILO) Core Conventions.

In addition to this we should promote human rights through our employment policies and practices, through our supply chain and through the responsible use of our products and services. The promotion of human rights through our business activities forms part of our broader objective to be a leader in corporate responsibility.

Ethical Trading Principles – Human Impact

In choosing the businesses we wish to develop long term partnerships with, we have established key principles which we would expect these businesses to adhere to. These have been based on the Ethical Trading Initiative Base Code, and we consider them to be fundamental to our Ethical Trading Policy. These are outlined below:

1. Employment is freely chosen.
2. Freedom of association is respected.
3. Working conditions are safe and hygienic, including safe housing where appropriate.
4. Child labour shall not be used.
5. Living wages are paid in line with local law.
6. Working hours are not excessive.
7. Discrimination is not practised.
8. Regular employment is provided 9. No harsh or inhumane treatment is allowed.

Ethical Trading Principles – Environmental Impact

Suppliers should, as a minimum, comply with all statutory and local legal requirements relating to the environmental impacts of their business in their country. In addition, steps should be taken to optimise the use of energy and natural resources and reduce the generation of waste.

Ethical Trading Principles – Economic Impact

We will not exert undue pressure on its suppliers in terms of price, discount, payment terms or other financial arrangements so as to jeopardise the long term viability of their operations. The company aims to use a variety of assessment methods to verify ethical sourcing standards. SIG will work collaboratively with our suppliers on the implementation of the Policy, which may include:

- 1 Vendor assessment questionnaires or joint audits.
- 2 Site visits.
- 3 Individual and group employee interviews.

The Company may use external sources such as SEDEX (Supplier Ethical Data Exchange) to allow for wider research and to cross check details with third party assessments.

Principle - Operating

We encourage a spirit of mutual trust between Northern Diver and our suppliers and will work with them to achieve required ethical standards and, as far as possible, at no increase in cost or decrease in quality.

- 1 A Northern Diver senior representative will be assigned responsibility for compliance with this policy and effective communication of the policy to employees. Suppliers are expected to do the same.
- 2 Suppliers and subcontractors will be treated fairly, honestly and in accordance with agreed terms.
- 3 From time to time, suppliers may divulge confidential information to Northern Diver and its employees. It is our duty to respect these confidences.
- 4 Any complaints from suppliers will be dealt with promptly and fairly.
- 5 It is not Company policy to knowingly infringe on the copyright, trademarks, patents or other properly registered intellectual property of others.
- 6 Employees will ensure that contracts or arrangements agreed with suppliers are consistent with the values and principles outlined and that they do not reflect badly on the reputation of the Company.
- 7 Any site visits conducted or interviews completed will be reported and the results communicated to suppliers to allow for transparency and feedback. We recognise this as a continuous improvement process, with the aim of working with suppliers to improve standards rather than find alternative sources of supply.

Respect for Local Tradition and Hidden Workers

Within the framework of this policy we will respect the local cultures of the countries within which Northern Diver operates, and be flexible in our approach.

Northern Diver expects access to information on supplier practices and will place particular emphasis on the use of 'hidden workers,' such as home workers, children and contracted labour, when considering suppliers from countries outside of normal operations.

Action

We expect suppliers to agree with the ethical stance outlined in this Policy and to commit to a programme of continuous improvement.

The directors have lead responsibility for policy implementation within the Company and this policy is signed by the General manager to demonstrate the company's commitment.



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General Manager

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