

Ethical Trading Strategy

Capstone Construction will aim to trade ethically at all times. To implement this policy, we will not take advantage of lower employment or manufacturing costs in developing countries, will not trade with those countries which our directors believe are violators of human rights, we will adhere to any Government recognised trading sanctions & we will refuse to work with any client or prospective client which we have reason to consider exploits humans, animals, or the environment unfairly.

Commitment to suppliers, service providers & customers:

We recognise that our ethical & social performance, & reputation is a key part of our overall commercial success. We are therefore committed to our:

▪ **Employees**

We ensure that our employment practices & the enforcement of corporate regulations protect 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 work force are safe, rewarded & valued. As we expand, we will inevitably, be able to offer more opportunities for our employees.

▪ **Customers**

We demonstrate our ethical & social responsibility credentials to enable our clientele to make informed choices about whose services they procure.

▪ **Suppliers**

We monitor social standards in our supply chain, & we encourage our suppliers to operate to the same ethical standards we employ ourselves.

Our Code of Practice:

- No forced, bonded, or involuntary labour shall be used
- All employment with Capstone Construction is freely chosen
- Staff are not required to lodge deposits or identity papers with us
- Staff are free to leave Capstone Construction after reasonable notice
- There shall be no recruitment of child labour
- Persons under the minimum school leaving age are not employed at any time
- Working conditions are safe & hygienic
- Staff receive regular health & safety training
- Staff have unrestricted access to toilet facilities & drinking water
- Working hours & remuneration are reasonable & comparable to other companies in our sector
- Staff pay rates are above the national legal minimum standards
- Staff are not forced to work in excess of 48 hours per week, a voluntary opt out agreement is available for those wishing to work in excess of 48 hours per week
- Staff are given written terms and conditions of employment that detail the employment relationship between, & the respective obligations of, the employee & employer, rates of pay, working hours, grievance & disciplinary procedures, holiday entitlement, absence & sick pay rules & notice periods for termination of employment
- Labour only contracting, sub-contracting & fixed term contracts are not used as a means to avoid obligations under labour or social security laws

To seek continual improvement, & assist in the implementation of this Policy, we will utilise external support as appropriate & seek advice on ethical trading matters from our appointed competent personnel.



Rhona Donnelly (Managing Director)