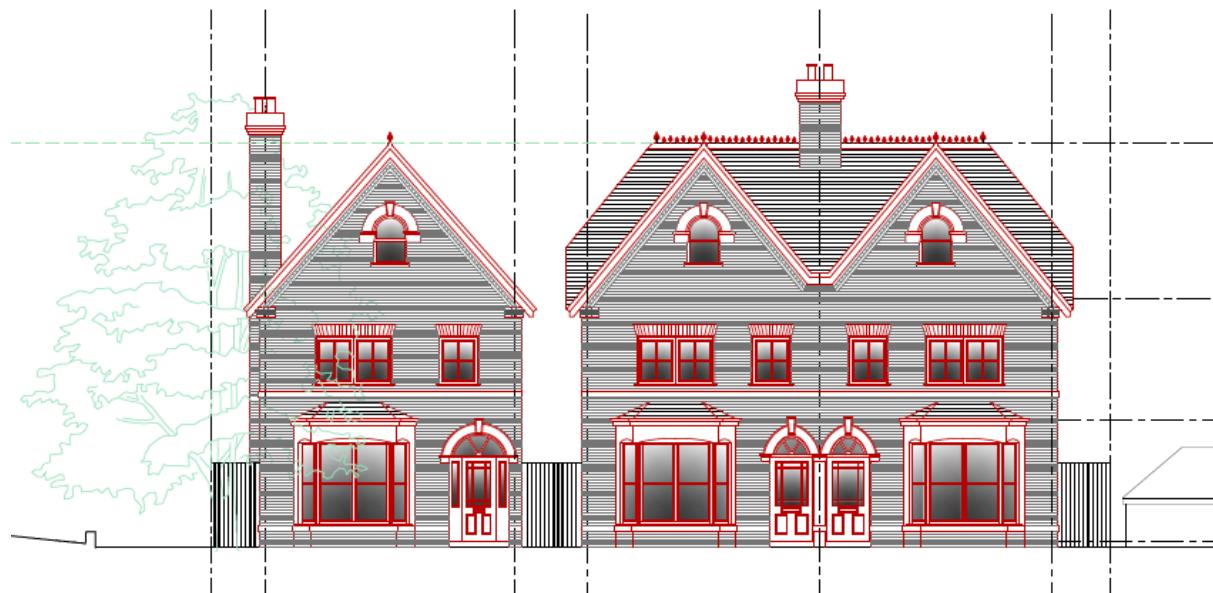




Ethical Trading Policy

2025





I. Implementation of Code Requirements

Alder Tree Construction Ltd Management systems for delivering compliance to this Code and maintenance records demonstrating compliance are established in place. An individual in a senior management position shall be appointed to ensure compliance with the Code.

Alder Tree Construction Ltd will communicate and ensure compliance of this Code across all workers, suppliers and any out-workers or sub-contractors engaged in their supply chain and will also provide means for workers to report or discuss non-compliances confidentially.

Alder Tree Construction Ltd will comply with all applicable national laws in the countries in which they operate and all relevant ILO conventions. Where these standards differ, the standard that provides workers with greater protection will prevail.

Reference: ILO Conventions 81 (Labour Inspection).

II. Employment of Children and Young Workers

Children under the age of 15 shall not be recruited or employed, unless the local minimum age for work or mandatory schooling specifies a higher age or if International Labour Organisation (ILO) developing country exemptions apply. Children must not be exploited or denied education, and their health and safety must be protected. Children may participate in activities which culturally involve the whole community over a limited period of time.

Children and young people under 18 shall not be expected to work at night or carry out activities that are potentially hazardous or injurious to their health and development.

Reference: ILO Conventions 138 and 182, Recommendation 146 (Minimum Age), Recommendation 190 (Worst Forms of Child Labour).

III. Forced Labour

There shall be no forced, bonded or involuntary labour of any description.

Alder Tree Construction Ltd will allow their workers the right to leave after giving reasonable notice, and with due regard to relevant domestic legislation.



Workers shall not be required to lodge deposits or I.D. papers unless it is a legal requirement to do so. In all circumstances these must be returned promptly upon cessation of employment.

Reference: ILO Conventions 29 and 105, Recommendation 35 (Forced and Bonded Labour).

IV. Health, Safety and Hygiene

Every effort shall be made to provide a safe and hygienic working environment, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps should be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work. Alder Tree Construction Ltd will, as far as is reasonably practical, minimize the causes of hazards inherent in the working environment. Procedures are in place to deal with serious injuries.

Alder Tree Construction Ltd will complete fully documented risk assessments of their sites and accommodation provided, and regularly monitor risks posed to workers' health and safety.

A senior management representative is responsible for health and safety issues. The Staff Council and Health and Safety Committee consults with workers to seek their contribution in assessing the site's health and safety and in developing health and safety standards.

No worker shall be employed in potentially hazardous conditions without receiving adequate health and safety training and supervision. Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

Records of health and safety training must be available for inspection. Individual workers must be able to demonstrate their understanding of the job and the ability to perform it to at least the minimum standard required by Alder Tree Construction Ltd.

Alder Tree Construction Ltd will provide adequate, climatically appropriate personal protective equipment and safety equipment free of charge to their workers.

Workers shall be provided with free access to potable water, clean toilet facilities, sanitary facilities for food storage and (if appropriate) washing facilities.

Where provided, accommodation shall be safe, clean and meet the basic needs of workers.

Secure storage facilities should be provided. Suppliers should provide a range of mixed gender, segregated and family accommodation as appropriate for the number of workers housed.



Where management provides dedicated transport for the movement of workers to, from, or within the workplace, these shall conform to the minimum standards set down in the appropriate national transport legislation. In the absence of such legislation, the management shall make every reasonable effort to minimise risk to the workers whilst transporting them.

Food, beverages, domestic goods and accommodation offered for sale to workers shall be at price levels no higher than those prevailing nationally or locally.

V. Freedom of Association and Worker Representation

Alder Tree Construction Ltd recognises and respects the rights of workers to freely join associations (such as workers councils, trade unions and workers associations) which can collectively represent their interests. Employers shall not interfere with or attempt to dominate or control such bodies, nor discriminate against workers choosing to belong to them.

Alder Tree Construction Ltd respects the rights of such workers' associations to represent their members, and to bargain collectively as defined and interpreted by the ILO and national legal framework.

Where the right to freedom of association and collective bargaining is restricted under national law, Alder Tree Construction Ltd will facilitate, and not hinder, the development of parallel means of independent and free association and bargaining. In such circumstances, Alder Tree Construction Ltd will share with their workers information which will affect working conditions and enable effective mechanisms for consultation.

Reference: ILO Conventions 87 and 98. Also relevant are Convention 135 and Recommendation 143 (Workers' Representatives), and Convention 154 (Collective Bargaining).

VI. Equality of Treatment

There shall be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on (but not limited to) gender, age, disability, national origin, race, marital status, sexual orientation, political opinion, union (or non-union) membership, religion, or caste unless provided for in domestic legislation.



Workers must not be expected to perform duties incompatible with their physical or mental abilities.

Reference: ILO Conventions 100 and 111, Recommendations 90 and 111 (Equal Remuneration, Discrimination (Employment and Occupation)), ILO Conventions 122 (Employment Policy), ILO Convention 159 & Recommendation 168 (Vocation Rehabilitation & Employment/Disabled Persons).

VII. Discipline

Physical abuse or discipline, the threat of physical abuse, verbal abuse, harassment or other forms of intimidation are not acceptable.

Disciplinary and grievance procedures shall be clearly documented and communicated to all workers. All disciplinary measures of a serious nature shall be recorded, including evidence that the worker knew what they were accused of and were given the right to put across their point of view.

VIII. Working Hours

Workers shall not be expected to work in excess of 48 hours per week or less if there is a lower national limit or an agreed industry norm.

Overtime shall be voluntary, limited to no more than 12 hours per week above full time, and not requested on a regular basis, it shall be paid at a premium rate or in accordance with national legislation.

There shall be proper provision for rest and sleep. Breaks, holiday allowance and rest periods shall be in full accordance with national law. Individual workers shall have on average at least one full day's rest per 7 days or the equivalent if shift work is involved.

IX. Wages

Wages and benefits shall be at least fully comparable with locally benchmarked industry norms or national legal requirements, whichever is higher. Wages shall always be sufficient for basic needs whilst still providing some discretionary income.



Before entering into employment, workers should be informed as to the payment process. Wages shall be paid directly to the workers in the form of cash or cheques or into the workers' nominated bank account, at the agreed intervals and in full. Information relating to wages shall be available to workers in an understandable form.

No deductions from wages, other than those required by national law, shall be permitted without the agreement of the worker concerned. Deduction from wages for disciplinary purposes shall not be permitted.

Reference: ILO Convention 131 and 90.

X. Regular Employment

All workers shall be provided with simple agreements which must detail the terms and conditions of their employment. Employers should ensure workers understand their agreements of employment, through verbal or written means, and such provisions should take account of the different languages spoken by workers.

Where Alder Tree Construction Ltd makes use of labour providers, the company will take measures to ascertain the conditions of employment of workers, and shall endeavour to ensure that, in respect of those working on their premises, the labour provider is complying with the standards set out in this Code and any additional relevant domestic legislation.

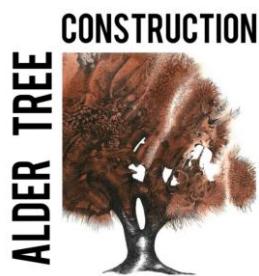
Alder Tree Construction Ltd will encourage workers to participate in all state benefit schemes.

Alder Tree Construction Ltd policy is to take effective steps, which are at least in compliance with the requirement or recommendations of government and/or local labour authorities, to avoid the employment of workers who do not have the legal right to work.

XI. Environment

Alder Tree Construction Ltd seeks to make continuous improvements in our environmental performance and, as a minimum, comply with the requirements of local, national and international laws and regulations.

Alder Tree Construction Ltd policy is to make practical efforts to minimise the use of energy, water, and raw materials: where possible these resources shall be renewable.



Alder Tree Construction Ltd policy is to make practical efforts to minimise solid waste and effluent and dispose of it in a safe, efficient, and environmentally responsible manner.

Alder Tree Construction Ltd policy is to avoid contamination of the local environment and ensure that air, noise, and odour levels are within nationally defined limits.

Name: Paweł OLSZANSKI

Signed: *Paweł Olszanski*

Date: 2nd of February 2025

Position: Managing Director