



## Ethical Business Policy

JJ O'Toole Ltd. is striving to ensure all their business and supply chain activities help to build a fairer more and socially just world. We recognise, support and abide by the fundamental ILO Conventions in relation to Child Labour, Forced labour, equality opportunity and the right to collective bargaining and freedom of association.

**The following Key Principles apply:**

No forced, bonded or involuntary labour shall be used.

- All employment with the Company is freely chosen.
- Employees identity documents (such as passports, identity cards, etc.) shall not be confiscated
- Employees are free to leave the Company after contractual notice.

No child labour shall be used.

- There shall be no recruitment of child labour.
- Children or persons under 16 are not employed at any time, day or night.
- We Comply with Young persons (16yrs to 18yrs) employment Act in relation to wages, hours worked, overtime, and working conditions.

Working conditions are safe and hygienic.

- The Company takes adequate measures to prevent accidents and minimise potential hazards.
- Access to clean toilet facilities and to portable water, and if appropriate, sanitary facilities for food storage is provided.
- Employees receive a health and safety induction along with regular health & safety training.
- The Company has a published Health & Safety statement.

Working hours and remuneration.

- Working hours comply with national law, collective agreement and or provisions of employment contract.
- Employees pay rates are above the national legal minimum standards.
- Employees are given written terms and conditions of employment that details the employment relationship and the respective obligations of the employee and the Company to include, full name of employer, registered address, place of work, job title, date of commencement of contract, remuneration, hours of work, grievance, bullying and harassment and disciplinary procedures, holiday entitlement, sick leave rules and 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.

No discrimination is practised.

- JJ O'Toole are an equal opportunity employer there is no discrimination in pay, hiring, compensation, access to training, promotion, and termination of employment or retirement on

the grounds of race, nationality, religion or belief, age, disability, marital status, civil partnership pregnancy and maternity sexual orientation, union membership or political affiliation.

- Opportunities for personal and career development are equally available to all employees.

The Company will appoint, train, develop and promote on the basis of merit and ability alone.

Freedom of association and the right to collective bargaining are respected.

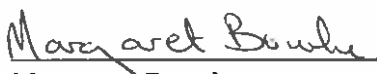
- Workers, without distinction have the right to join or form trade unions of their own choosing and to bargain collectively.
- JJ O'Toole adopts an open attitude towards the activities of trade unions and their activities
- Worker Representatives are not discriminated against and have access to carry out their representative function.
- Where the right to freedom of association and collective bargaining is restricted under law, the employer facilities, and does not hinder, the development of parallel means for independent and free association and bargaining.

No harassment, threats, abuse or intimidation shall be practiced. Physical, verbal and sexual threats, abuse, harassment or intimidation is expressly prohibited. Any breach of this policy may be seen as gross misconduct and may result in disciplinary action, up to and including dismissal.

The company Directors have all responsibility for the overall compliance with this policy to ensure that The Company operates within the Irish Law and EU Charter of fundamental rights.

All business relationships and across our supply chain are required to observe and comply with this policy. Should violation of any of these principles become known to us and not be remediated, we will take serious action, including discontinuation of the business relationship. We are committed to working with all our contacts to improve working conditions for all employees.

**Signed:**

  
Margaret Bourke  
Operations Manager

Date: 02/01/2023