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# Ethical Trading Policy

## Northern Divers Engineering Ethical Trading Policy

### 1. Introduction

Northern Divers Engineering is committed to upholding the highest standards of ethical conduct in all our trading practices. We believe that conducting business with integrity, fairness, and transparency is essential to maintaining trust with our stakeholders, including customers, suppliers, employees, and the communities in which we operate. This Ethical Trading Policy outlines the principles and practices we adhere to in our supply chain and business dealings.

### 2. Objectives

The objective of this policy is to ensure that Northern Divers Engineering:

- Operates in a manner that reflects integrity, transparency, and responsibility.
- Upholds fair labor practices, human rights, and environmental sustainability across our supply chain.
- Works only with partners and suppliers who share our commitment to ethical trading.

### 3. Core Principles


#### a. Fair Labour Practices

Northern Divers Engineering is committed to ensuring that all workers within our supply chain are treated with dignity and respect. We require all suppliers and business partners to comply with the following labor standards:

- No forced, bonded, or compulsory labour.
- No child labour.
- Workers are compensated with fair wages, in accordance with local legal standards and market conditions, and receive appropriate benefits.
- Safe and healthy working conditions, with a commitment to minimising occupational hazards.
- Freedom of association, allowing workers to join or form trade unions.

#### b. Human Rights and Non-Discrimination

We believe in the protection and promotion of human rights in every aspect of our business. Northern Divers Engineering opposes discrimination on the grounds of race, gender, nationality, religion, disability, or any other status. We require our suppliers and partners to adopt similar policies and practices, ensuring equal opportunities for all individuals involved in the supply chain.

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### c. Environmental Responsibility

Northern Divers Engineering recognizes the importance of environmental sustainability in our operations. We are dedicated to minimizing our environmental impact and encourage our suppliers and partners to do the same by:

- Reducing waste and emissions across the supply chain.
- Complying with environmental laws and regulations.
- Promoting sustainable sourcing practices, especially in relation to raw materials.

### d. Ethical Business Practices

We operate with the utmost integrity, transparency, and accountability. Northern Divers Engineering commits to:

- Preventing corruption and bribery, ensuring fair dealings in all our transactions.
- Complying with all applicable local, national, and international laws and regulations, including anti-bribery and anti-corruption policies.
- Maintaining honest marketing, advertising, and sales practices, with no misleading information or unfair tactics.
- Ensuring that all business activities are carried out in a way that fosters trust and respect.

### e. Accountability and Transparency

We believe in open communication and transparency with our stakeholders. Northern Divers Engineering is committed to providing accurate information regarding our business operations and ethical trading practices. We encourage our suppliers and partners to share similar commitments and to be transparent about their practices.

## 4. Supply Chain Standards

Northern Divers Engineering requires all suppliers to:

- Adhere to the principles outlined in this Ethical Trading Policy.
- Regularly assess and ensure compliance with our standards.
- Provide documentation and evidence of compliance, including labor practices, health and safety records, and environmental impact.
- Engage in continuous improvement efforts to uphold ethical trading practices and improve their sustainability performance.

## 5. Monitoring and Auditing

To ensure compliance with this policy, Northern Divers Engineering will:

- Regularly audit and monitor our supply chain to assess adherence to ethical standards.
- Conduct supplier assessments, including unannounced inspections, to verify the practices of our business partners.
- Collaborate with independent third-party auditors to ensure objectivity and fairness in evaluations.
- Take appropriate action against any supplier or partner that fails to meet the required ethical standards, including suspension or termination of the business relationship.

### 6. Reporting Concerns

If any employee, supplier, or partner becomes aware of unethical practices or violations of this policy within our supply chain, they are encouraged to report their concerns through the following channels:

- Direct reporting to management or the ethical trading team.
- A confidential whistleblowing system, available to all stakeholders, ensuring that concerns are addressed without fear of retaliation.

### 7. Implementation and Review


This Ethical Trading Policy will be communicated to all employees, suppliers, and business partners, and will be reviewed annually to ensure its continued relevance and effectiveness. Northern Divers Engineering will update the policy as necessary to align with evolving ethical standards, industry best practices, and legal requirements.

### 8. Conclusion

Northern Divers Engineering is committed to conducting business in a socially responsible, ethical, and sustainable manner. This policy represents our dedication to upholding the highest standards of business ethics and will guide our operations, supply chain relationships, and future growth.



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 J Sparrowe  
**Managing Director**

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