

Social Responsibility Policy Statement

This policy sets out the standards we expect from our employees, associates and suppliers in their internal and external dealings with colleagues, customers, stakeholders and third parties.

Basic Standards of Conduct:

- we will conduct every aspect of our business with honesty, integrity and openness, respecting human rights and the interests of our employees, customers and third parties.
- we will respect the legitimate interests of third parties with whom we have dealings in the course of our business.
- we will maintain the highest standards of integrity

With regards our employees and associates we are committed to:

- developing a workforce where there is mutual trust and respect, free from bullying and harassment, where every person feels responsible for the performance and reputation of our company
- respecting the rights of individuals their customs and traditions
- recruiting, employing and promoting employees and associates on the basis of objective criteria and the qualifications and abilities needed for the job to be performed in line with our Equal Opportunities Policy
- maintaining good communications with employees through our information and consultation procedures
- providing our employees and associates with suitable training and assisting them in realising their potential
- ensuring the privacy and confidentiality of our employees' and associates personal information is respected
- suitably rewarding our employees and associates for their contribution to the success of the business;
- providing mechanisms whereby employees can raise legitimate concerns confidentially regarding malpractice and ensuring no one will be victimised for a report made in good faith;

“We seek to be a good corporate citizen in all that we do”

- providing employees with the appropriate information and training to comply with this policy and the associated policies; and
- seeking to protect our employees from third party abuse that might be injurious to their safety, health or well-being.

Bribery

No employee or associate working on our behalf must accept or give a bribe, facilitation payment or other improper payment for any reason.

This applies to transactions with government officials, any private company or person anywhere in the world. It also applies whether the payment is made or received directly or through a third party.

We shall ensure that adequate procedures are in place to prevent the risk of bribery and that these are effectively communicated and implemented.

Community Involvement

Our activities, products and services touch members of the community daily.

We are committed to fostering good relationships with the communities in which we work and building community partnerships that deliver positive change.

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Confidentiality

Information received by anyone in the course of his or her employment must not be used for personal gain or for any purpose other than that for which it was given.

Where confidential information is obtained in the course of business that confidentiality must be respected.

Conflicts of Interest

Whilst we respect the privacy of our employees and associates, all employees and associates are expected to avoid personal relations, activities and financial interests which could conflict with their responsibilities to the company.

Employees and associates must not seek gain for themselves or others through misuse of their positions or company property.

All actual and potential conflicts (including those arising from the activities or interests of close relatives or partners) must be disclosed to and discussed with the Managing Director.

Customers

The company is committed to providing safe, value for money, high quality, consistent, accessible and reliable services to its customers.

All employees and associates are expected to behave respectfully and honestly in all their dealings with customers and the general public in accordance with the principles set out in this policy. In particular we will safeguard and protect the welfare of vulnerable people who come into contact with our employees and associates.

Data Protection

We will comply with the relevant principles governing data protection in each country in which we operate.

Environment

The company is committed to making continuous improvement in the management of its environmental impact as set out in our Environmental Policy.

All employees and associates are expected to adhere to the requirements of the local environmental management system and support the improvement in our environmental performance.

Equal Opportunities and Diversity

We are committed to equality of opportunity both in the provision of services to the public and as an employer. The purpose of this policy is to ensure that all employees, associates, customers, contractors and those who come into contact with the company are treated equally and with fairness and consistency at all times.

This policy seeks continuous improvement and compliance with legislation. It is based on the principles that:

- all people have the right to be treated with dignity and respect
- we will not discriminate on the grounds of race, gender, disability, nationality, religion, philosophical belief, political belief, age, sexual orientation, family status, trade union activity or any other factor
- we will adopt fair and inclusive practices throughout our operations and will eliminate all prejudice, discrimination, bullying and harassment
- all employees and associates have a personal responsibility for the practical application of this policy in their day-to-day activities and must support the policy at all times
- non-compliance with this policy will be treated seriously and will not be tolerated

Gifts, Entertainment and Improper Payments

Accepting or giving any entertainment or gift that is designed to, or may be seen to influence business decisions, is not acceptable. No employee or associate shall offer, give, seek or receive, either directly or indirectly, inducements or other improper advantages for business or financial gain. If an employee or associate is in any doubt as to whether he or she may accept an offer, that employee or associate should discuss the issue with the Managing Director.

Any gift or hospitality given or received by an employee or associate shall be reported for inclusion on a register.

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Health, Safety and Welfare

We are committed to creating and maintaining a safe and healthy working environment for our employees, associates, customers and the community.

Our commitment to ensuring the safety and security of our employees and associates is set out in our Health, safety and welfare policy.

Human Rights

The company supports the principles of the UN Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. We will adhere to the following principles in respect of our staff:

- we will treat all employees and associates fairly and honestly, regardless of where they work. All staff and associates will have agreed terms and conditions in accordance with local law or practice and will be given appropriate job skills training.
- we will pay a fair wage reflecting local markets and conditions. We will always meet any national minimum wage.
- working hours shall not be excessive. They shall comply with industry guidelines and national standards where they exist.
- employment must be freely chosen. We will not employ illegal child labour, forced or bonded labour, forced overtime or condone illegal child labour.
- employees and associates have the rights of freedom of association and collective bargaining.
- We will negotiate in good faith with the properly elected representatives of our employees.
- we will abide by the non-discrimination laws in every country where we operate.
- we will not use or condone the use of corporal punishment, mental or physical coercion or verbal abuse. We have disciplinary procedures for any member of staff whose conduct falls below the required standard.
- we have a grievance procedure through which staff and associates can raise personal and work-related issues.
- all staff and associates will be given reasonable access to bathroom and rest facilities.

Integrity

We aim to develop strong relationships with our suppliers, stakeholders and others with whom we have dealings, based on mutual trust, understanding and respect.

In those dealings, we expect those with whom we do business to adhere to business principles consistent with our own.

We will conduct our operations in accordance with the principles of fair competition and applicable regulations.

The company's accounting and other records and supporting documents must accurately describe and reflect the nature of the underlying transactions.

No unrecorded account, fund or asset will be established or maintained.

We will comply with the laws and regulations applicable wherever we do business. We will obtain legal advice where felt necessary to comply with this commitment.

We will review and track our business risks including social and environmental risks.

We will not facilitate, support, tolerate or condone any form of money laundering.

To ensure that our business is run in an ethical and effective manner we will maintain internal controls.

Malpractice

We have a zero-tolerance approach to malpractice and are committed to acting ethically and with integrity in all business dealings and relationships.

Our employees, subcontractors and suppliers are required to look for any signs of malpractice and to report it if it is suspected.

Modern slavery

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which

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have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all business dealings and relationships.

Our employees, subcontractors and suppliers are required to look for any signs of modern slavery and to report it if it is suspected.

National and International Trade

We will seek to compete fairly and ethically within the framework of applicable competition and anti-trust laws and we will not prevent others from competing fairly with us.

We will comply with all applicable export control laws and sanctions when conducting business around the world.

Personal Conduct

All employees and associates are expected to behave in accordance with the principles set out in this policy.

Employees and associates are expected to protect and not misuse company assets such as buildings, vehicles, equipment, cash and procurement cards.

Employees and associates are expected to use e-mail, internet, IT and telephones in a manner appropriate for business purposes in line with the principles contained in this policy and any applicable IT policies.

Plagiarism

We will use our own, original work. Where information is obtained from another author, credit will be given to that source.

We will act against any person, or any organisation that seeks to plagiarise our original work without our express permission.

Political Activity

The company does not make any donations to political parties or take part in party politics.

Stakeholders

The company will conduct its operations in accordance with the principles of good corporate governance.

We will provide timely, regular and reliable information on the business to all our stakeholders.

Supply Chain

We purchase a range of goods and services required in the operation of our business and we also rely on a number of key suppliers for the delivery of our core services. Good working relationships with our suppliers are therefore central to the success of our business.

Whilst we are committed to obtaining and retaining competitive goods and services we will at the same time seek to ensure they are from sources that have not jeopardised human rights, safety or the environment.

We expect our suppliers to adhere to business principles consistent with our own. We expect them to adopt and implement acceptable safety, environmental, product quality, product stewardship, labour, human rights, social and legal standards.

We will seek to work with our suppliers to develop long-term meaningful relationships to benefit both parties with the aim of improving the quality, environmental performance and sustainability of goods and services.