

We recognise that our social, economic, ethical and environmental responsibilities to our stakeholders (**customers, employees, regulators, investors, suppliers, the community and the environment**) are integral to our business and its' success. We believe in being fair, open and honest.

### **Employment, Equality and Diversity and Fair Pay**

We are committed to creating and maintaining a safe and healthy working environment for our employees and will strive to create a workplace in which there is mutual trust and respect, where every person feels responsible for the performance and reputation of the company and is proud to be part of its success.

We will also respect the individual and each other's rights, customs and traditions including the right to freedom of association and the right to decide whether or not to join a trade union and will negotiate in good faith with properly elected representatives of our employees.

We operate an equal opportunities policy for all present and potential future employees. There are safeguards in place to ensure that all employees are treated with respect and without sexual, physical or mental harassment. We operate an 'open door' policy of access to all of our top management including the Managing Director and the General Manager.

We work towards achieving a diverse workforce, recruiting, employing and promoting employees only on the basis of objective criteria in addition to the qualifications and abilities needed for the job to be performed. It will maintain good communications with employees through the provision of information and consultation procedures. All employees have terms and conditions of employment to safeguard and protect these characteristics and access to fair pay and work conditions.

Wages and salaries are paid at market rates and in accordance with prevailing legislation. Employee working hours are also compliant with the prevailing legislation with breaks away from the workplace enforced. Overtime is voluntary and is allocated on an equitable basis.

It is the Company's hope that it can assist employees in realising their potential.

See also our Equality and Diversity and Fair Pay Policy and Modern Slavery Policy.

### **Business Ethics**

This code applies to all of the operations of the Company and sets out the minimum standards which the Board expects from staff in their internal and external dealings with colleagues, customers, stakeholders and third parties.

We take an ethical approach to marketing and sales. We are keen to develop strong relationships with our suppliers, stakeholders and others, based on mutual trust, understanding and respect. We expect those that we deal with to adhere to business principles consistent with those of our Company. We will also conduct our operations in accordance with the principles of fair competition and any laws and regulations applicable wherever we do business or who we do business with. We have an anti-bribery and Corruption Policy and a Tax Evasion Policy to support this. Appropriate training will be provided for employees as necessary.

The Company shall not offer, give, seek or receive, either directly or indirectly, inducements or other improper advantages for business or financial gain and no employee may offer, give, seek or receive any gift or payment which is, or could be construed as such. If an employee is in any doubt as to whether he or she may accept an offer, that employee should discuss the issue with his or her manager, the Company Secretary or Managing Director

The Company's accounting and other records and supporting documents will accurately describe and reflect the nature of the underlying transactions and no undisclosed or unrecorded account, fund or asset will be established or maintained.

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

We are committed to providing safe, value for money, high quality, consistent and reliable products to its customers. We will conduct our operations in accordance with the principles of good corporate governance and provide timely, regular and reliable information on the business to all our shareholders.

See also our Anti-bribery policy and Tax Evasion Policy.

### **Environment and Sustainability**

The Company is committed to making continuous improvement in the management of its environmental impact and will work with its partners to promote environmental care, increase understanding of environmental issues and disseminate good practice.

We conserve energy, water, paper, and other resources, particularly those which are scarce or non-renewable. Energy consumption associated with our premises and activities are our greatest environmental aspect and as this also is our largest expenditure, we are constantly reviewing it and implementing measures to reduce consumption.

We purchase materials and goods that are from sustainable and recycled sources where possible and feasible. We also evaluate our supplier chain with regards to their corporate and social responsibilities with raw materials and fabricated goods. We abide by the principles of conflict free sourcing initiative to assist with informed choices when sourcing orders through our supply chain.

We and our suppliers complete the universally used conflict minerals reporting template for any goods or components that contain tin (cassiterite), tantalum (columbite tantalite), gold and tungsten (wolframite) to ensure that they are from suitable, acceptable and compliant smelters. All of our Buyers work closely with our suppliers to ensure that we purchase the best environmental options available. We also consider end-of-life and life-cycle of materials and products with view to them having a long life and being recyclable when no longer effective.

We aim for sustainable development through re-use, recycling and reclamation and extend this to raw material supply chain. We recycle and re-use products wherever possible. We have recycling avenues for wastes and by-products from maintenance and servicing of vehicles. We also buy recycled products and those which are the best environmental option.

We minimise releases of greenhouse gases, volatile organic compounds and other substances with the potential to do damage to health and the environment. Having phased out ozone – depleting products, we no longer purchase or use ozone-depleting products.

Our management programme checks noise emissions are within statutory requirements. We then monitor them to ensure that they do not increase above permissible levels or to cause nuisance.

We are committed to preventing pollution.

We recognise that transport associated with purchased goods adds to carbon footprint and hence where we need to use suppliers that are not local, we will collate deliveries together to minimise repetitive journeys. This also ensures that we maximise the socio-economic and environmental benefits of goods and services purchased.

### **Climate Change**

Climate change has now been recognised as an international issue and the U.K Government is committed to taking action to reduce greenhouse emissions. While we are not a major user of fossil or other fuels, we recognise that we can still assist in at the supporting the government and communities to reduce the impacts of climate change wherever possible. The Company is therefore committed to reducing the greenhouse gas emissions from its operations in a way which supports national government strategies and in line with our commitment to our stakeholders.

Our commitment is to

- actively promote improved energy efficiency in its operations and fuel efficiency in company vehicles.
- seek alternative fuel and energy developments and continue to assess their commercial viability and appropriateness for use within our premises and as a minimum, stay above the UK average for energy source from recyclables and nuclear combined as identified in the Electricity (Fuel Mix) Disclosure Regulations.

### **Biodiversity**

All businesses affect biodiversity through the use of resources and discharge of waste products. We are therefore committed to ensure that where we are able, we promote biodiversity and reduce resource and waste.

Our policy is to strive to enhance biodiversity where practicable.

See also our Environmental Management and Sustainability Policy

### **Supplier Engagement**

We have developed strong relationships with our suppliers, based on mutual trust, understanding and respect. More specifically suppliers are expected to:

- adhere to business principles consistent with our own;
- ensure that their products and services are produced and delivered to comply with all legislation relevant to their business;
- seek to maintain continuous improvement in their supply chain relationship with us; and
- ensure they adopt and implement acceptable safety, environmental, product quality, product stewardship, labour, human rights, social and legal standards in line with the Company's own code and to ensure these issues are acceptably managed within the supply chain for any products supplied to the Company.

We will seek to work with our key and critical suppliers to:

- develop long-term meaningful relations to the benefit of both parties; and
- improve the quality, environmental performance and sustainability of goods and services where this can be achieved to the benefit of both parties

We support the welfare and rights of both our own employees and encourage our suppliers to do likewise. Our approved supplier process ensures that we evaluate contractors and suppliers of products and services so that we can control who we work with. Where we discover that they are not adopting a corporate socially responsible attitude, adopting responsible business policies and practices, are considered to be using unfair business practices or are blatantly polluting the environment, we will cease trading with them.

See also our Control of Externally Provided Services and Products Policy.

### **Community Engagement**

We will strive to be a good corporate citizen and to fulfil our responsibilities to the societies and communities in which we reside and operate. Wherever possible, we will seek to engage with local community based charities and national ones that can have an impact on the local community.

The Company will conduct every aspect of its business with honesty, integrity and openness, respecting human rights and the interests of our employees, customers and third parties. It will also respect the legitimate interests of third parties with whom it has dealings in the course of its business, and will maintain the highest standards of integrity. For example, the Company will not knowingly promise more than it can reasonably deliver or make commitments that cannot or are not intended to be kept.

We are committed to working with our customers to improve social and environmental performance and to achieve best value - value for money.

We work with our neighbours and the wider community where we can improve the area we reside and operate, utilising local labour within our workforce and as sub-contractors so that the local economy is preserved and sustained, offering fair prices and wages to attract suitable workers and support.

In line with our core values, our community strategy incorporates the following elements:

- offering employment opportunities to all sectors of the community through non-discriminatory policies and promoting opportunities to disadvantaged and vulnerable groups;
- promoting engagement between our staff and the community;
- supporting local community groups and charities wherever possible;
- and improving the environment in and around our operations.

### **Health and Safety**

We work to continually improve the health, safety and welfare of our employees and work to the principles of BSEN ISO45001:2018. All staff, contractors and visitors can be assured of a safe and secure environment. Effective instruction, information, induction, training, and supervision is provided to ensure compliance.

We have a Health and Safety Policy document which identifies arrangements and roles and responsibilities. It has been communicated to all employees to ensure that they understand their obligations and responsibilities and those of the company.

Its effective implementation, monitoring and auditing ensures that we meet our statutory obligations to prevent injury, accident, and incident in line with our objectives to have 'zero incidents'.

### **Human Rights**

We support the principles of the United Nations Universal Declaration of Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work. We will adhere to the following principles in respect of our employees:

- we will treat all employees fairly and honestly, regardless of where they work. All staff will have agreed terms and conditions in accordance with law or practice and will be given appropriate job skills training;
- we will pay a fair wage reflecting local markets and condition and will always meet any national minimum wage;
- working hours shall not be excessive. They shall comply with industry guidelines and national standards;
- we will not employ illegal child labour, forced or bonded labour, forced overtime or condone illegal child labour;
- employees have the rights of freedom of association and collective bargaining. The Company respects the right of its employees to choose whether or not to join a trade union without influence or interference from management. Furthermore it supports the right of its employees to exercise that right through a secret ballot;
- we will negotiate in good faith with the properly elected representatives of our employees;
- we will abide by the non-discrimination laws;
- we will not use or condone the use of mental or physical coercion or verbal abuse. The Company has disciplinary procedures for any member of staff whose conduct falls below the required standard;
- we have a formal grievance procedure through which staff can raise personal and work-related issues;
- and all staff will be given reasonable access to bathroom and rest facilities.

See also the Modern Slavery Policy, Whistleblowing policy, grievance policy and disciplinary policy

### **Compliance**

Compliance with this policy will be continuously monitored and subject to an annual review by the Senior Management Team. Compliance will be reported to stakeholders through management review meetings.

Each manager is responsible for ensuring that the principles set out in this policy are communicated to, understood and observed by all employees and for ensuring compliance in their area of responsibility.

Employees who reasonably suspect that there has been a breach of this policy must report it to their line manager or senior management. We recognise that employees may be reluctant to report concerns for fear of retaliation. This can therefore be anonymously in accordance with the Whistleblowing policy if preferred. We will take disciplinary action against any employee who threatens or engages in retaliation, retribution or harassment of any person who has reported or is considering reporting a concern in good faith. We will not criticise management for any loss of business resulting from adherence to the principles set out in this policy.



Simon Riley  
Managing Director