

Corporate Social Responsibility Policy

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The Company strives to be a good corporate citizen in all its operations and activities. To this end we have brought together a series of operating principles under the broad heading of Corporate Social Responsibility (CSR) to serve as a guide to our employees in all aspects of their work for the company.

The principles cover all areas of the Group's operations and have been developed with reference to the relevant codes of corporate governance and best practice, including the revised Combined Code and international statements and guidelines such as UN Universal Declaration of Human Rights and the OECD Guidelines for Multinational Enterprises. Taken together, these principles form our CSR policy.

The policy can be divided into six main areas:

1. Ethical Business Conduct
2. Policies Specific to Employees
3. Policies Specific to the Group
4. Fair Employment Practices
5. Workplace Health & Safety, and
6. Environmental Policy.

1. Ethical Business Conduct

A. Our Principles

We value the principles of accountability, honesty and integrity in our business. Our policy is to conduct our business in a manner which ensures:

- Fair treatment of all employees and clients.
- Transparency of our business policies and practices.
- High standards in all matters relating to health, safety and the environment.
- Ethical business practices throughout our operations.

We recognise that the involvement of our employees is key to the success of the business and we have traditionally adopted a policy of keeping employees fully informed on all matters affecting them. We have consistently operated a remuneration strategy that recognises both corporate and individual performance. We are also committed to best practice in employment matters, recognising the role this plays in attracting and retaining staff.

To succeed in delivering the best possible service to our clients, every employee is expected to adhere to the Group's core values and to uphold them in the workplace. Employees are expected to exercise the highest ethical judgement and comply with laws applicable to their duties.

2. Policies Specific to Employees

B. Outside Interests

The Company requires that employees avoid any situation which may involve a conflict of interest between the employee and the Company. Employees are expressly prohibited from accepting other paid employment, including directorships in other companies, without the consent of the Directors. In general, this does not apply to charitable work or relationships with non-profit organisations unless this has the potential to impact on the employee's normal duties.

C. Dealing with Customers

The Company is committed to the provision of accurate information and fairness in all its dealings with customers and other external parties having direct business with the Company.

D. Confidentiality

Every employee shall respect any information which is confidential to the Group including, but not limited to, trade secrets, confidential knowledge or any information concerning the process or invention used by the Company. Breaches of confidentiality may be cause for disciplinary action.

E. Data Protection

Throughout the Company we are committed to complying with the data protection principles established by the General Data Protection Regulation 2018. All employees and agents of the Company are responsible for ensuring compliance with the policy. Information collected may be accessible throughout the Company but will not be disclosed to any third party in a form which identifies the individual concerned. It will not be used for marketing purposes without the individual's consent and will not be sold to third parties. Upon request, an individual will be informed of the existence, use and disclosure of his or her personal data and will be given access to that data to confirm its accuracy or to amend it.

F. Fair Dealings

Dealing with clients will be undertaken in a manner which is unquestionably fair for the client. The buying and selling of merchandise, for example, will not prejudice any party and should be administered within the compliance regulations governing trading operations.

G. Malpractice

The Company has a zero tolerance policy on malpractice in its workplace, with specific application to activities involving bribery and corruption, fraud and money laundering. Where 'food and entertainment' is provided for clients, this is legitimately entered in the accounts.

All staff members are required to report any unusual patterns of trading activity which could be interpreted as money laundering.

H. Use of Company Information/Assets

Employees shall use the company's computer systems, internet and email systems for business use. Any employee found to have disclosed confidential information, been abusive or malicious in using these facilities, or misusing the systems in any way may face disciplinary action. The Company strictly prohibits the use of its internet and email systems for acquiring, producing or disseminating pornography or similar material, including the use of abusive language or offensive images.

I. Disciplinary Procedure

The Company has a detailed formal disciplinary procedure, full details of which are contained on the Company Employee Handbook.

3. Policies Specific to the Group

A. Political Contributions

It is Company policy not to make contributions for political purposes. However, employees are not hindered from being politically active in their own time using their own resources.

B. Corporate Governance

1. Background

Since its beginnings in 1984, the Company has been committed to its core business values of integrity, transparency, honesty and accountability. The Company is committed to complying with good corporate governance policies and to listening to and acting in accordance with the wishes of its directors.

2. Meetings of the Directors

The Directors are scheduled to meet each year to review financial performance and strategy and have a formal schedule of matters reserved for decisions, which includes the setting of company goals, objectives, budgets and other plans and in particular, reports on the Company's corporate social responsibilities and to

identify the relevant risks to the Company's short and long term values, more on which is contained later in this document.

3. Internal Controls

David Bricknell, Managing Director, has overall responsibility for the Company's system of internal control and for reviewing its effectiveness. The internal controls are designed to manage, rather than eliminate, risk of failure to meet business objectives and to provide reasonable assurance against material misstatement or loss. The system of internal control is embedded within the day to day operations of the Company and a strong culture is combined with clear management responsibility and accountabilities for individual controls.

Once a year a formal risk control report is compiled. This includes a summary of significant risks, key internal controls, the work of the monitoring functions and findings arising during the period. In this context we identify staff retention and corporate reputation as the significant risks to the company's short and long term value. Senior Partners are keenly aware of the importance of these issues and are committed to ensuring that any risks are assessed and minimised.

4. Community Investment

Our community investment programme has two main components, charitable giving and support for a variety of local and national organisations. The Company encourages staff to donate their time to local causes and will accommodate reasonable requests for time away from the office to engage in community activities.

5. Charitable Donations

At the commencement of each fiscal year the management will allocate an amount to donations to charity and support for good causes. The Company will aim to grow this core amount over time and, depending on the profitability of the Company, may make specific one-off donations. Our active involvement in charitable work creates a channel for feedback on the Company's activities which helps to shape policy in this area.

6. Pay Roll Giving

The Company has a pay roll giving system in place whereby individuals can allocate part of their income directly to a charity or group of charities. This encourages and facilitates regular donations by employees.

7. Activities in the Community

The Company has grown and diversified since its founding in 1984. For some time now we have been engaged as a Company with the business community through various networking forums. We have also been involved with national and local charities, schools and educational authorities.

We operate a flexible working policy which permits staff to use a certain amount of working time each year to devote to charitable activities. Members of staff act as school governors, or are members of parent/teacher associations.

8. Benefits of Community Involvement

As the Company becomes more involved in the community the Company may be invited to propose or participate in new projects. Staff will be updated on these activities.

4. Fair Employment Practices

In formulating employment policy, the Company had been guided by the relevant legislation in the UK and by the framework established by the OECD. The guidelines encourage companies to foster openness, sustainability, and respect for employees' rights. The policies cover all employees in the UK and are periodically reviewed and updated, when appropriate.

A. Equal Opportunities Employer

The Company is committed to providing equal opportunities to all workers and job applicants. It aims to ensure that no job applicant shall receive less favourable treatment on the grounds of sex, marital status, sexual orientation, race, colour, religion or belief, nationality or ethnic origin. The Company will not treat an employee or job applicant less than favourably for a reason relating to their disability or part time or fixed term status unless this can be justified. The Company will also take all reasonably practical steps to ensure that disabled applicants or workers are able to participate in its business activities on an equal basis with people who are not disabled.

All employees are responsible for complying with this policy and for ensuring that the standards of behaviour required by the Company are observed by:

- Treating others on their merits and disassociating themselves from any form of direct or indirect discrimination, victimisation or harassment.
- Bringing to the attention of their Departmental Manager any suspected working practise in breach of this policy, and
- Working together to promote a harmonious working environment free from discrimination, harassment or bullying.

The Company regards direct or indirect discrimination, victimisation and harassment as a serious matter. Employees who fail to comply with this policy will be subject to the Company's disciplinary procedure. All breaches of this policy will be regarded as serious disciplinary matters and will, if there has been victimisation, intentional discrimination or deliberate harassment be regarded as potential gross misconduct leading to summary dismissal.

The Company recognises that misunderstandings can arise where people of a different sex, interests and cultures work together. Any employee who believes that he or she

is being treated in a way that is contrary to this policy should raise the issue with their Departmental Manager. Failing this, he or she may contact the Human Resources Department.

B. Human Rights

The Company supports the Universal Declaration of Human Rights in its spheres of influence, upholds freedom of association and recognises the right to collective bargaining.

C. Forced/Child Labour

The Company does not utilise or promote forced labour or child labour of any kind and adheres to UK laws governing labour standards.

D. Discrimination, Sexual Harassment and Other Forms of Harassment and/or Bullying.

All staff members are entitled to work in an environment which respects personal dignity and is free from harassment, bullying or any other type of intimidation. Harassment, whether on the grounds of sex, race, colour, nationality or ethnic origin, religion or belief, or age, disability, sexual orientation, being in an inferior position in terms of power or hierarchy (leading to bullying), willingness to challenge harassment (leading to victimisation) or otherwise will not be tolerated by the company.

E. Employee Benefits.

The Company recognises the value of its employees and has identified staff retention as key to the short and long term value of the Company. To this end, the Group aims to attract and retain skilled employees and enhance the life/work balance of each. The Company offers full time staff a range of benefits, including maternity and paternity leave and generous holiday allotment. Also available to employees are personal development and training programmes designed to enhance their skills. All such programmes shall relate directly to the specific role of the individual within the Company and are linked closely with his/her annual performance review.

F. Grievances.

The Company has adopted a grievance procedure to provide employees who have a problem or complaint about their work with a mechanism for resolving the issue fairly and speedily. The grievance procedure encompasses the statutory grievance procedure.

5. Workplace Health & Safety.

A. Health & Safety Policy.

The Company aims to provide each employee with a safe place to work. We abide by local Health & Safety Regulations and submit to Health & Safety assessment. Relevant information on occupational Health & Safety is provided in the staff HS handbook. Further information on Health & Safety topics can be discussed with the Company's Human Resource Department.

B. Health & Safety Records.

The Company records all accidents and/or near misses and investigates these to determine if preventative action is required to prevent further accidents.

6. Environmental Policy.

A. Background.

The Company understands that its activities affect the environment and the communities in which we operate and accepts responsibility to identify and manage these impacts as effectively as possible. We are committed to improving our environmental performance and moving towards best practices in corporate sustainability.

B. Communicating the Policy.

The policy is displayed on our staff notice board and a general overview is included in the staff induction programme. Employees are encouraged to provide feedback and suggestions. We amend our environmental policy annually to reflect the necessary changes in our business and our ongoing care of our environment.

C. Environmental Policy

The Company aims to:

- Minimise environmental impacts of our existing operations and ensure that the environmental impacts of new operations are fully assessed and minimised prior to their introduction.
- Reduce consumption of materials in all operations, where practicable, to reuse rather than dispose of materials where possible, and promote re-cycling and use of recycled materials.
- Seek to improve the energy efficiency of buildings and to manage energy wisely in all operations.
- Reduce, wherever practicable, the level of harmful emissions from our office premises.
- Introduce programmes to minimise waste.
- Dispose of waste and effluents in a responsible manner.
- Promote the ownership and control of environmental issues at business level.
- Provide the necessary training and support in order to ensure that staff fulfil their requirements.

- Work with our suppliers to minimise the impact of their operations in the environment through a quality purchasing policy.

D. Environmental Risks.

As a Company we have no major environmental risks. However, important aspects noted are the use of paper, the constant demand for energy and CO2 emissions resulting from the company's operations. Substantial quantities of paper are used in proposals and marketing literature and in the record keeping process. Energy used for heating, lighting and cooling of offices and for office equipment is another critical element of the process while CO2 emissions from energy and from travel by employees including the delivery and installation team is also significant. The environmental policy seeks to mitigate these risks and the Environmental Management System explains further how we seek to achieve this.

E. Environmental Management System.

The Company's Environmental Management System (EMS) has the following components and objectives. As additional areas for monitoring are identified, they will be integrated into the EMS.

Energy

The Company aims to reduce the consumption of energy and will strive to ensure that the office premises use energy in as efficient a manner as possible. Energy is used for office lighting, heating and cooling systems and for the operation of office equipment and kitchen appliances.

a) Lighting

The Company has been through the process of replacing the original lighting for energy efficient lighting solutions throughout the premises.

b) Heating

To make more efficient use of heating systems we will ensure that an average temperature of not more than 22°C is maintained.

c) Air-conditioning units are used in our offices only when required and are switched off when the office is not in use.

d) Kitchen Appliances

We aim to ensure that our kitchen appliances are energy efficient and that they release the minimum amount of waste product.

Water

We seek to reduce the amount of water used. Usage and cost are monitored.

Paper

We seek to reduce the amount of paper used and to increase the amount of paper that is re-used or recycled. Where possible, client reports will be printed on recyclable

and chlorine free paper. Staff make use of electronic communications and the scanning of documents into electronic records for storage.

Waste

General office waste is collected and removed by cleaners to a skip for removal by a registered waste contractor, or is collected weekly by the local authorities.

Used toner cartridges are collected for donation to charity.

Redundant computers and IT equipment will be sold or given to charity. Any equipment not sold or given to charity will be collected by an approved company to dispose/recycle in a manner that is environmentally friendly and adheres to EU regulations.

Hazardous Materials

We will accept responsibility for monitoring hazardous materials found in the office including asbestos and refrigerants to ensure that they do not pose a risk to our employees.

We will ensure that annual service and maintenance programmes for our air conditioning plants are carried out, as required under current guidelines.

Transport

Transport is a major source of CO2 emissions. To reduce these emissions the Company encourages employees to use public transport wherever possible. Car sharing is promoted.

Conference calls are used where possible to reduce the need for travel.

Supply Chain Management

We wish to encourage sustainability and environmentally sound sourcing and production methods in our suppliers manufacturing and delivery processes. To this end we will inform our suppliers of our Environmental Policy and will favour companies with established environmental policies and practices in the allocation of future contracts. We also aim to use local suppliers, goods and services where practicable.

Involvement in the Community

The Company fosters good relationships within the communities it serves. We will identify specific community areas of concern on which our business has an impact. Where practicable, these will be integrated into our EMS procedures and we will work to resolve them.

Signed:

A handwritten signature in blue ink that reads "David Bricknell". The signature is written in a cursive style with a large, stylized initial "D".

Name: David Bricknell
Title: Managing Director

Date: June 2022
Review: June 2023