



## **CORPORATE SOCIAL RESPONSIBILITY**



## Statement of Business Principles

In the conduct of its operations the company and its employees shall:

- Be open and honest in all dealings, whilst respecting commercial and personal confidentiality
- Be objective, consistent and fair with all our stakeholders
- Act with integrity in the business and community in which we operate
- Respect the dignity and well-being of all those people who work for us and those with whom we have contact
- Operate professionally and be committed to continuous improvement

1. These Business Principles reinforce our **Core Values**:

**Openness, Honesty, Objectivity, Consistency, Fairness, Integrity, Respect and the Importance we attach to Continuous Improvement.**

2. Taken together the core values and business principles over-arch and define the way we do business.
3. We seek to apply our Business Principles in all aspects of our business. Four policies – Business Integrity, Environment, Health & Safety, and Social Issues – support these principles, and guidelines and detailed working procedures are in place to operate these policies at a practical level.
4. We will ensure that the principles and policies are actively promoted and communicated to all our stakeholders. We will prepare and support all our people to implement and apply the policies and procedures in an effective way.
5. We will actively monitor the implementation of the policies and procedures and report on compliance to the Board on an annual basis.
6. We will assess and manage risks to our business.
7. We will protect the confidentiality of the company, employees, customers and suppliers.
8. We will be truthful and accurate in all communications.



## **Business Integrity Policy**

### **Objectives**

1. To act honestly, fairly and with integrity and respect in all our business dealings.
2. To enhance the good reputation of the company.
3. To manage our affairs prudently and with due skill, care and diligence.

### **Policies**

1. To comply with all applicable laws of the United Kingdom and those of other countries where we have business dealings, including the rules of any relevant regulatory authority.
2. To deal with regulators in an open and co-operative manner.
3. To prohibit all employees from making or receiving gifts of substance in the course of business, and in particular gifts and inducements will not be offered or accepted that encourage or reward decisions.
4. Properly to record, report and review financial and tax information.
5. Clearly to define responsibilities and control procedures.
6. To use information received from our partners in the best interests of the business relationship and not for personal financial gain by any employee.
7. To identify and declare conflicts of interest should they arise within our various businesses and to give due regard to the interests of other parties concerned.
8. To deal seriously with any matter raised in good faith by an employee in confidence and to encourage employees to draw attention to breaches of company policy and procedures.



## **Health and Safety Policy**

### **Objectives**

1. To provide safe and healthy working conditions for our employees and to safeguard the health and safety of all those affected by our operations.
2. To ensure that our business complies with internationally recognised standards of good practice in order to protect the health and safety of our employees while at work.

### **Policies**

1. Our business will comply with United Kingdom legislative requirements, and those of other countries where we have business dealings, as an absolute minimum, as far as occupational health and safety are concerned.
2. Our health and safety policy, will maintain regular consultation with, and feedback to, all relevant employees and the procedures and allocation at senior level of responsibility for implementation will be continually monitored.
3. Occupational health and safety will be raised as a regular issue at Board level when appropriate and not less than once per year.
4. Specific risks arising from our work activities will be regularly assessed, with a view to introducing measures to eliminate or reduce those risks.
5. The company will not only safeguard the health and safety of our employees, but also of others working in or visiting its operations, including contractors and their employees, who may be subject to risk from our activities, and of any others who may be affected by our operations.
6. All company staff must at all times co-operate with their managers in adhering to legal requirements and to company rules, policies and procedures.

## **Environment Policy**

### **Objectives**

1. To recognise that economic development may result in both adverse and beneficial environmental change. Sustainable development seeks to maximise the potential of environmental resources, to mitigate any adverse impacts on the environment, and where possible to increase the supply of environmental assets.
2. As part of our business objectives we therefore:
  - a. seek the efficient use of natural resources;
  - b. seek investment opportunities where sound economic development is coupled with the protection and improvement of the environment;
  - c. avoid investments where impacts on communities and the environment have not been properly considered and mitigated in their design.

### **Policies**

In furtherance of our objectives, to adhere to the principles listed below:

1. The company will ensure that the environmental effects of its investments are assessed and monitored in the planning, implementation and operational stages.
2. Our business will be designed and operated to comply with national legislation.
3. The Company will not knowingly support businesses which contravene any relevant international environmental agreement to which the countries in which we do business are a signatory.
4. The company will assess the environmental standards and practices proposed for planned projects and achieved by operational projects with reference to local regulations.

## **Social Issues Policy**

### **Objectives**

1. To recognise that the company's business may result in social change.
2. As a responsible member of the community we will therefore:
  - a. identify, through consultation, any negative social aspects of our operations and address the ways in which these might be mitigated;
  - b. identify, through consultation, potential social benefits and determine how they might be enhanced to the mutual benefit of company and community.
  - c. ensure the positive social impact outweighs any negative effects.

### **Policies**

In furtherance of our objectives, to adhere to the principles set out below:

1. Ensure that the social effects of our investments are assessed and monitored in the planning, implementation and operational stages. Areas of key social impact, which may be identified, include resettlement, importation of labour, change in the provision of social services, substantial job losses and cultural property issues.
2. The company will meet or exceed the standards required by national laws, including those that protect core labour standards.
3. We seek to adopt a consultative approach to recognise the ways in which our operations will affect people both directly and indirectly.
4. Our business will be designed and operated in a way which takes account of its effect on the community within and without the company, reflecting international good practice.
5. In our dealings with the wider business community, we will seek, by example and influence, to have a beneficial effect on social issues.
6. Wages will meet or exceed industry or legal national minima.
7. Employees will be treated fairly and impartially in terms of recruitment, progression, terms and conditions of work and representation, irrespective of gender, race, colour, disability or social origin, while being sensitive to cultural issues, special to the host country, which may need to be recognised.
8. Harassment in any form will not be tolerated.
9. We attach importance to consultative work-place structures and associations, which provide employees with an opportunity to present their views to management.