

CORPORATE SOCIAL RESPONSIBILITY POLICY

Contents	Page
1 INTRODUCTION.....	3
2 COMPLIANCE, MONITORING AND REPORTING	3
3 CODE OF BUSINESS ETHICS.....	4
3.1 GENERAL STATEMENT	4
3.2 BASIC STANDARDS OF CONDUCT	4
3.3 EMPLOYEES.....	4
3.4 BUSINESS INTEGRITY	5
3.5 NATIONAL AND INTERNATIONAL TRADE	5
3.6 PERSONAL CONDUCT	5
3.7 BRIBERY	6
3.8 GIFTS, ENTERTAINMENT AND IMPROPER PAYMENTS	6
3.9 CONFLICTS OF INTEREST	6
3.10 CONFIDENTIALITY	6
3.11 POLITICAL ACTIVITY	6
3.12 HEALTH AND SAFETY	7
3.13 THE ENVIRONMENT	7
3.14 CUSTOMERS.....	7
3.15 STAKEHOLDERS	7
3.16 SUPPLY CHAIN	7
3.17 COMMUNITY INVOLVEMENT.....	8
4 HEALTH AND SAFETY POLICY	8
4.1 GENERAL STATEMENT	8
4.2 RESPONSIBILITY.....	8
4.3 MONITORING AND REPORTING	9
4.4 INJURY PREVENTION PRINCIPLES	9
5 SECURITY.....	10
5.1 GENERAL STATEMENT	10
6 EMPLOYMENT.....	11
6.1 GENERAL STATEMENT	11
6.2 EQUAL OPPORTUNITIES AND DIVERSITY POLICY.....	11
6.3 LEGISLATION AND CODES OF PRACTICE	11
6.4 REPORTING	12
6.5 COMPLAINTS.....	12
6.6 CONFIDENTIAL REPORTING PROCEDURE (WHISTLEBLOWING)	12
6.7 PRACTICES AND STANDARD OPERATING PROCEDURES	12
6.8 ACCESS TO COMPANY PREMISES	13
6.9 ACCESS TO VEHICLES.....	13
6.10 ACCESS TO INFORMATION	13
6.11 INFORMATION SECURITY – DISCLOSURE OF INFORMATION	13
6.12 RECRUITMENT	13
6.13 STAFF TRAINING	14
6.14 AUDIT.....	14

6.15	HUMAN RIGHTS.....	14
6.16	ANTI-SLAVERY POLICY STATEMENT.....	14
6.17	DATA PROTECTION.....	16
7	CUSTOMER AND COMMUNITY.....	16
7.1	CUSTOMERS.....	16
7.2	COMMUNITY.....	16
8	ENVIRONMENT.....	17
8.1	ENVIRONMENTAL POLICY.....	17
8.2	CLIMATE CHANGE POLICY.....	18



CORPORATE SOCIAL RESPONSIBILITY POLICY

Definitions

References to “we” and “our” shall mean Hosiden Besson Ltd.

1 Introduction

- 1.1 Hosiden Besson Ltd seeks to be a good corporate citizen in everything that it does.
- 1.2 We have therefore determined to bring together our existing operating principles into one framework policy under the heading of Corporate Social Responsibility (CSR). The principles encompassed in this policy cover all areas of the operations and have been developed and continue to be reviewed against and updated by reference to relevant codes of corporate governance and international standards including the United Nations (UN) Universal Declaration of Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, the Guidelines for Multinational Enterprises established by the Organisation for Economic Cooperation and Development (OECD), the Rio Declaration on Environment and Development and the UN Convention against Corruption.
- 1.3 Hosiden Besson Ltd (HBL) supports the principles set out in those codes and standards and the aim of this policy is to translate that support into a set of guidelines and standards that set a common approach and provide practical guidance for our managers and employees.

2 Compliance, monitoring and reporting

- 2.1 Compliance with this policy will be continuously monitored and subject to review.
- 2.2 Management 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.
- 2.3 Employees who reasonably suspect that there has been a breach of this policy must report it to their line manager, senior management, or through other mechanisms established by the company to report such breaches. We recognise that employees may be reluctant to report concerns for fear of retaliation and 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.
- 2.4 All sections of this policy are underpinned by the companies Code of Business Ethics, which is set out in Section 3. The other areas covered by this policy are Health and Safety (Section 4), Security (Section 5), Employment (Section 6), Customer and Community (Section 7) and Environment (Section 8).

3 Code of Business Ethics

3.1 General statement

This Code of Business Ethics sets out the standards we expect from our employees in their internal and external dealings with colleagues, customers and third parties.

3.2 Basic Standards of Conduct

- 3.2.1 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.
- 3.2.2 We will respect the legitimate interests of third parties with whom we have dealings in the course of our business.
- 3.2.3 We will maintain the highest standards of integrity - for example, we will not promise more than we can reasonably deliver or make commitments we cannot or do not intend to keep.

3.3 Employees

We are committed to:

- a) 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;
- b) respecting the rights of individuals their customs and traditions and their right to freedom of association and the right to decide whether or not to join a trade union. We will negotiate in good faith with properly elected representatives of our employees;
- c) recruiting, employing and promoting employees 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;
- d) maintaining good communications with employees through our information and consultation procedures;
- e) providing our employees with suitable training and assisting them in realising their potential;
- f) ensuring the privacy and confidentiality of our employees' personal information is respected;
- g) suitably rewarding our employees for their contribution to the success of the business;
- h) 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;
- i) providing employees with the appropriate information and training to comply with this Code and the associated policies;

- j) seeking to protect our employees from third party abuse that might be injurious to their safety, health or well-being.

3.4 Business Integrity

- 3.4.1 We aim to develop strong relationships with our suppliers and others with whom we have dealings, based on mutual trust, understanding and respect.
- 3.4.2 In those dealings, we expect those with whom we do business to adhere to business principles consistent with our own.
- 3.4.3 We will conduct our operations in accordance with the principles of fair competition and applicable regulations.
- 3.4.4 HBL's accounting and other records and supporting documents must accurately describe and reflect the nature of the underlying transactions.
- 3.4.5 No unrecorded account, fund or asset will be established or maintained.
- 3.4.6 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.
- 3.4.7 We will review and track our business risks including social and environmental risks.
- 3.4.8 The Company will not facilitate, support, tolerate or condone any form of money laundering.
- 3.4.9 To ensure that our business is run in an ethical and effective manner and acknowledges its obligations towards its employees, stakeholders and the communities in which we work and operate.

3.5 National and International Trade

- 3.5.1 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.
- 3.5.2 We will comply with all applicable export control laws and sanctions when conducting business around the world.

3.6 Personal Conduct

- 3.6.1 All employees are expected to behave in accordance with the principles set out in this Code of Business Ethics.
- 3.6.2 Employees are expected to protect and not misuse company assets such as buildings, vehicles, equipment, cash and procurement cards.
- 3.6.3 Employees 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 Code and any applicable IT policies.

3.7 Bribery

- 3.7.1 No employee or individual or business working on our behalf must accept or give a bribe, facilitation payment or other improper payment for any reason.
- 3.7.2 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.
- 3.7.3 HBL shall ensure that adequate procedures are in place to prevent the risk of bribery and that these are effectively communicated and implemented across the company in line with the requirements of the Bribery Act 2010.

3.8 Gifts, Entertainment and Improper Payments

- 3.8.1 Accepting or giving any entertainment or gift that is designed to, or may be seen to influence business decisions, is not acceptable. No employee shall offer, give, seek or receive, either directly or indirectly, inducements or other improper advantages for business or financial gain. 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.
- 3.8.2 Any gift or hospitality given or received by an employee should be reported. In the UK this applies to any gift or hospitality with an estimated or actual value of £50 or more.

3.9 Conflicts of Interest

- 3.9.1 Whilst we respect the privacy of our employees, all employees are expected to avoid personal relations, activities and financial interests which could conflict with their responsibilities to the Company.
- 3.9.2 Employees and consultants must not seek gain for themselves or others through misuse of their positions or company property.
- 3.9.3 All actual and potential conflicts (including those arising from the activities or interests of close relatives or partners) should be disclosed to and discussed with an employee's line manager.
- 3.9.4 There should be no unauthorised disclosure of price sensitive information to third parties.

3.10 Confidentiality

- 3.10.1 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.
- 3.10.2 Where confidential information is obtained in the course of business that confidentiality must be respected.

3.11 Political Activity

HBL does not make any donations to political parties or take part in party politics. However, when dealing with Government we do make legitimate concerns known and will seek to influence Government in relation to issues that could affect us, our customers or the local community. These relationships are conducted in accordance with this Code.

3.12 Health and Safety

- 3.12.1 We are committed to creating and maintaining a safe and healthy working environment for our employees, customers and the community.
- 3.12.2 Our commitment to ensuring the safety and security of our employees is set out in our Health & safety manual.
- 3.12.3 We strive to avoid emergency situations but recognise the need to be prepared. We are committed to having effective emergency response procedures in place.

3.13 The Environment

- 3.13.1 HBL is committed to making continuous improvement in the management of its environmental impact as set out in our Environmental Policy.
- 3.13.2 All employees are expected to adhere to the requirements of the local environmental management system and support the improvement in our environmental performance.

3.14 Customers

- 3.14.1 HBL is committed to providing safe, value for money, high quality, consistent, accessible and reliable services to its customers.
- 3.14.2 All employees 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 Code.
- 3.14.3 In particular we will safeguard and protect the welfare of vulnerable people who come into contact with our employees. Employees will be made aware that they hold a position of trust and that they must at all times maintain the highest standards of personal conduct that reflects this trust being placed with them.

3.15 Stakeholders

- 3.15.1 The company will conduct its operations in accordance with the principles of good corporate governance and where possible adherence to the United Nations Sustainable Development Goals (SDG's).
- 3.15.2 We will provide timely, regular and reliable information on the business to all our stakeholders.

3.16 Supply Chain

- 3.16.1 We purchase a wide range of goods and services required in the operation of our business and we also rely heavily 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.
- 3.16.2 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.

- 3.16.3 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.
- 3.16.4 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.
- 3.16.5 HBL's Procurement & Supply Policy sets out clear guidelines in the way that it expects procurement and supplier management activities to be carried out.
- 3.16.6 Orders and contracts must be awarded impartially and on merit through fair competition in accordance with the company procedures and its sustainable procurement policy.
- 3.16.7 Employee's whose work involves the procurement, appointment or supervision of contractors must disclose any former, current, private or official relationship with relevant contractors to their immediate manager.
- 3.16.8 When a conflict of interest is disclosed, company reserves the right to remove the employee from any area of direct or indirect involvement in the matter in hand.

3.17 Community Involvement

Whether as customers, neighbours, employees, businesses or residents, we are committed to fostering good relationships with the communities in which we work and building community partnerships that deliver positive change.

4 Health and Safety Policy

4.1 General Statement

- 4.1.1 Injury Prevention is our commitment to health and safety at HBL. It is our core value and part of our way of life and applies to everything we do. Its purpose is to ensure the health and safety of all our employees, customers and others affected by our business.
- 4.1.2 We believe that:
 - a) all injuries are preventable; and
 - b) our goal is zero injuries.

4.2 Responsibility

Injury Prevention is the responsibility of every employee and working safely is a condition of employment. Management must ensure that all their staff are safe at all times by ensuring:

- a) that Injury Prevention processes are properly organised and appropriately resourced;
- b) staff are given information, instruction and training on risk assessment and Injury Prevention;

- c) there is full compliance with Health and Safety laws and HBL policies on Health and Safety; and
- d) performance targets are set for continual improvement in Injury Prevention.

4.3 Monitoring and reporting

We will monitor progress on Injury Prevention in all our operations and will conduct periodic audits to assess performance. In addition:

- a) The Health & Safety Committee will receive and review reports at its monthly meetings.
- b) All serious incidents will be reported immediately.

Remember: Injury Prevention - 'If you cannot do it safely, do not do it'.

4.4 Injury Prevention Principles

- 1 Prevent injury to myself and to others.**
Be aware of any hazardous condition or practice that may cause injury to people or damage to property or the environment. Report issues to your supervisor immediately.
- 2 Perform all necessary safety checks. Risk assess my work area and the job before I do any work.**
Speak to your supervisor before you start work if you are unsure.
- 3 Follow all safety procedures, signs and instructions.**
If you do not understand, speak to your supervisor before you start work.
- 4 Keep my work area clean and tidy at all times.**
Untidy areas could cause injury to you or to your colleagues and waste time and energy.
- 5 Wear my protective clothing and equipment as required.**
Keep it in good condition, wear it correctly and ask for a replacement if it becomes damaged or unfit for your use.
- 6 Use only the correct tools and equipment that I am authorised and trained to use for the job.**
Check that they are in good condition before use and use them safely.
- 7 Only adjust and repair any piece of work equipment if I am trained and authorised to do so.**
Never modify any equipment which changes the designed use of the equipment.
- 8 Assess my capability to move any load before lifting.**
Make sure you get help with any heavy or awkward items and follow the correct techniques.
- 9 Report all injuries, incidents and near misses to my supervisor.**
Seek help immediately and first aid if necessary.
- 10 Tell my supervisor if I have any suggestions to prevent injuries in my workplace.**
Record your suggestion and discuss with your supervisor.

5 Security

5.1 General Statement

- 5.1.1 Security is a key issue, our staff and our business. We recognise the range of security issues which can arise and have implemented the following high level security policy.
- 5.1.2 Management is committed to ensuring, so far as is reasonably practicable, the security of our employees at work and our property.
- 5.1.3 The threats to security are wide-ranging, significant and, in the main, driven by external influences. The ability to control risks varies. However, we have the ability to address or mitigate all of the threats we face. To be successful in this we need the co-operation and engagement of all of our staff.
- 5.1.4 Security is an area in which we seek continuous development and improvement and compliance with existing and emerging legislation. We shall ensure all members of staff understand why they should and how they can play their part. Our efforts shall bring greater personal and corporate security and business benefit.
- 5.1.5 This statement provides guidance and direction to all employees on what is both required and expected of them. We are confident our staff will appreciate the reasons for this and the benefits to them, their colleagues and our property.
- 5.1.6 The Management are asked to achieve, so far as is reasonably practicable:
- a) a secure environment for staff, contractors & third parties;
 - b) security of our property; and
 - c) security of our systems and processes.
- 5.1.7 We shall monitor our performance on security within our operations. All operations will be subject to periodic inspection and review.

5.2 Monitoring and Reporting

- 5.2.1 HBL recognises that this security policy needs to be supported by actions and processes to ensure delivery. The following measures are in place to assist this:
- a) The importance of security is emphasised to all staff through regular security briefings.
 - b) Staff are actively encouraged to report security concerns.
 - c) This approach to security allows us to ensure we have a process to translate into effective implementation within the business. It also allows us to formally recognise and demonstrate our commitment to the need for continuous development and improvement in this important aspect of our business.
 - d) We also require contractors to comply with this policy whilst they are working at our premises.
 - e) We are committed to operating in a safe and secure way. Within this commitment it is recognised that, despite our best efforts and perhaps due to events beyond our control, an emergency situation may occur. In these circumstances it is appropriate that, however remote the possibility, the business is able to respond effectively if such a situation does arise.

6 Employment

6.1 General Statement

In formulating its employment policies, HBL is guided by the framework established by the OECD in its Guidelines for Multinational Enterprises. The Guidelines encourage companies to foster openness, sustainability and respect for employee rights. The policies set the standard for equal opportunities and diversity and cover all employees.

6.2 Equal Opportunities and Diversity Policy

- 6.2.1 HBL is committed to equality of opportunity both in the provision of services as an employer. The purpose of this policy is to ensure that all employees, customers, contractors and those who come into contact with HBL are treated equally and with fairness and consistency at all times.
- 6.2.2 This policy seeks continuous improvement and compliance with legislation. It is based on the principles that:
- a) all people have the right to be treated with dignity and respect;
 - b) 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;
 - c) we will adopt fair and inclusive practices throughout our operations and will eliminate all prejudice, discrimination, bullying and harassment;
 - d) all employees 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; and
 - e) non-compliance with this policy will be treated seriously and will not be tolerated.:
 - f) create a productive and safe working environment, promoting diversity and inclusion in their workforce;
 - g) actively demonstrate the company's diversity policy and practices;
 - h) develop new practices to ensure inclusion for employees, contractors and customers; and
 - l) demonstrate continuous improvement in diversity and equal opportunities for all.

6.3 Legislation and Codes of Practice

This policy conforms to the current international legislation and relevant codes of practice in the countries within which HBL operates. We will continually monitor this policy to ensure we are compliant with the requirements of relevant underpinning legislation; however our aim is to exceed the requirements of legislation wherever possible.

6.4 Reporting

We will present an annual report on our actions and achievements reflecting this Diversity policy to the Board, and report on our performance in HBL's Corporate Social Responsibility report.

6.5 Complaints

Any employee who feels that he or she has grounds for complaint in relation to bullying, discrimination, harassment or victimisation has the right to pursue the complaint through HBL's grievance procedure. Customers who feel they have grounds for complaint may pursue these through the customer complaints procedure. The company's complaints procedure must be accessible to all.

6.6 Confidential Reporting Procedure (whistleblowing)

- 6.6.1 The company is committed to the highest possible standards of openness, probity and accountability, and expects its employees who become aware of activities which they believe are illegal, improper, unethical or otherwise inconsistent with this code to report the matter, acting in accordance with the companies rights under the Public Interest Disclosure Act 1998.
- 6.6.2 The employment handbook on the intranet contains further guidance and the full whistleblowing policy.
- 6.6.3 Employee's must ensure that interested parties and assets are protected by reporting immediately to their line manager or alternative contacts as named in the whistleblowing policy, and concerns about dishonesty or impropriety which they suspect has occurred or is likely to occur.
- 6.6.4 Initial enquires will be made which made which may result in a formal investigation.
- 6.6.5 Concerns or allegations which fall within the scope of specific procedures for example safeguarding) will normally be referred for consideration under those procedures.
- 6.6.6 If an employee makes an allegation which it transpires is frivolous, malicious or for personal gain, the company will treat this as a serious matter which may lead to disciplinary action.
- 6.6.7 Employee's must not make any public statements in any capacity whatsoever about matters covered by the whistleblowing policy until they have exhausted that policy, unless such a disclosure is allowed for within the policy.
- 6.6.8 Employee's must assist in any investigation or hearing into suspected misconduct.

6.7 Practices and Standard Operating Procedures

Detailed practices and standard operating procedures which support this policy will be particular to the operation they support, and will at all times act in support of this policy.

6.8 Access to Company Premises

We will take all reasonable steps to ensure that our buildings and premises are accessible to disabled employees, customers and visitors as required by the Disability Discrimination Act (DDA) in the United Kingdom.

6.9 Access to Vehicles

We will also take reasonable steps to ensure that our vehicles are accessible to customers and staff and comply with the relevant legislation for the country in which they operate.

6.10 Access to Information

We will seek to ensure that information is made available to our customers and employees in alternative formats as required.

6.11 Information Security – Disclosure of Information

Employee's must positively prevent information misuse and ensure the accuracy of information by:

- a) Protecting information against unauthorised access.
- b) Assuring the confidentiality of stored information.
- c) Maintaining the integrity of information.
- d) Meeting all current regulatory, legislative and company policy requirements in relation to information governance.
- e) Ensuring that flexible working/worksmart and remote access policies and procedures are followed when undertaking mobile/home working.
- f) Producing, maintaining and testing business continuity plans or facilitating such actions where not their direct responsibility but requested to assist.
- g) Providing and making available relevant information and security training for other employee's or assisting with such actions where not their direct responsibility but requested to assist.
- h) Preventing improper use of office equipment.
- i) Limiting the use of electronic mail and internet to those uses permitted by the companies related policies and procedures.

6.12 Recruitment

All recruitment will be carried out with regard to fairness, equality and consistency for all candidates at all times. Recruitment practices will be inclusive and any barriers to employment removed under the relevant legislation.

6.13 Staff Training

Guidance and training will be provided to all staff with regard to diversity awareness and equality to ensure we are both an inclusive employer and service provider.

6.14 Audit

We are committed to ensuring that our operations comply with the requirements of this policy. We aim to ensure compliance via regular audits and reviewing of action plans.

6.15 Human Rights

HBL 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:

- a) We will treat all employees fairly and honestly, regardless of where they work. All staff will have agreed terms and conditions in accordance with local law or practice and will be given appropriate job skills training.
- b) We will pay a fair wage reflecting local markets and conditions. We will always meet any national minimum wage/living wage.
- c) Working hours shall not be excessive. They shall comply with industry guidelines and national standards where they exist.
- d) Employment must be freely chosen. We will not employ illegal child labour, forced or bonded labour, forced overtime or condone illegal child labour.
- e) We will negotiate in good faith with the properly elected representatives of our employees.
- f) We will abide by the non-discrimination laws in every country where we operate.
- g) 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.
- h) We have formal grievance procedures through which staff can raise personal and work-related issues.
- i) All staff will be given reasonable access to bathroom and rest facilities.

6.16 Modern Slavery & Human Trafficking

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 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 we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

6.16.1 Responsibility

HBL have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

6.16.2 Compliance

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or company Director OR report it in accordance with our Whistleblowing Policy as soon as possible.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

If a raised concern is not remedied, and you are an employee, you should raise it formally using the Grievance Procedure, which can be found in the current employee handbook.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

6.16.3 Communication & Awareness

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and updates will be provided using established methods of communication between the business and you.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

6.16.4 Breaches

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

6.17 Data Protection

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

7 Customer and Community

7.1 Customers

7.1.1 Customer Service: Delivering our promise to our customers is one of our core values. Our commitment is to provide safe, reliable, customer focused, innovative and sustainable service.

7.1.2 We will:

- a) act in accordance with fair business, marketing and advertising practices and take all reasonable steps to ensure the safety of our services;
- a) respect the human rights of our customers;
- c) ensure our security and revenue protection arrangements are consistent with international standards for law enforcement;
- d) provide transparent and effective procedures that address customer complaints and contribute to fair and timely resolution of disputes without undue cost or burden;
- e) not make representations or omissions nor engage in any other practices that are deceptive, misleading, fraudulent or unfair; and
- f) respect customer privacy and provide protection for personal data in accordance with the relevant local law.

7.2 Community

7.2.1 The operation of our services touches on all members of the community with the potential to impact positively on quality of life. We also have responsibility to those living and working nearby as well as being a significant employer.

7.2.2 Our relationships with the local communities we serve are therefore very important to us and are an essential part in the growth of our business.

7.2.3 We engage with the community at a range of levels as customers, neighbours, potential employees, businesses and residents. Through our community strategy, we seek to play our part in promoting socially inclusive policies, encouraging the young and disadvantaged and helping older members of the community and the disabled.

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

- a) Engagement with the local communities in which we operate on the quality of our service;
- b) Working with local authorities, businesses and other interested parties to promote sustainability and improve quality of life;
- c) Offering employment opportunities to all sectors of the community through non-discriminatory policies and promoting opportunities to disadvantaged and vulnerable groups;
- d) Promoting engagement between our staff and the community;
- e) Supporting local community groups and charities;
- f) Improving the environment in and around our operations;
- g) Promoting broader opportunities for workplace learning;
- h) Supporting local initiatives for the development and education of young people in the areas we serve; and
- i) Working closely with local law enforcement agencies to address anti-social behaviour, crime and vandalism as well as promoting road safety.

8 Environment

8.1 Environmental Policy

8.1.1 Through our core business activities we are committed to providing good quality, reliable and cost-effective service to all of our customers. We recognise the environmental impacts arising from our business activities and are committed to reducing these through effective environmental management.

8.1.2 HBL's policy is to achieve continual improvement in environmental performance.

8.1.3 We are committed to:

- a) maintaining an internal management structure for environmental issues which includes clearly defined responsibilities;
- b) complying with, and where possible exceeding, applicable legal and other requirements relating to the organisation;
- c) preventing pollution and reducing the overall impact of our operations on the environment;
- d) monitoring our environmental performance and setting objectives and targets for improvement;
- e) providing appropriate training and awareness programmes for our staff.

- f) maintain ISO 14001 certification.
- g) take into account environmental issues when design new products.

8.1.4 This policy applies to the company's operations and will be communicated to all those working for or on behalf of the company. The policy is made available to members of the public on request.

8.2 Climate Change Policy

8.2.1 Climate change has now been recognised as an international issue. As a manufacturer we have a role in supporting governments and communities to reduce the impacts of climate change from road transport.

8.2.2 We are committed to reducing the greenhouse gas emissions from our operations in a way which supports Government strategies and in line with our commitment to provide safe, efficient and reliable services. We also assess the potential risk to our business from evolving climate change policies as part of our ongoing risk management processes.

8.2.3 Our key climate change commitments are:

- a) to work actively with our suppliers to improve our energy efficiency;
- b) to actively promote improved energy efficiency and fuel efficiency within the business;
- c) to stay abreast of alternative utility developments and continue to assess their commercial viability.

APPROVAL

The signatures below certify that this corporate social responsibility (CSR) policy has been reviewed, accepted and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision.

	Name	Sign	Position	Date
Prepared by	Jonathan Grout	Jonathan Grout	Production Engineer	
Reviewed by	Frank Welch	Frank Welch	Quality Engineer	
Approved by	Donna Vye	Donna Vye	Managing Director	

AMENDMENT RECORD

This CSR policy is reviewed to ensure its continuing relevance to the systems and process that it describes.

Page No.	Context	Revision	Date
N/A	Initial Release	A	12/09/2016
6, 11 & 12	Added notes 3.16.6 – 3.16.8 on page 6 (ECN 8958). Added notes 6.6.1 – 6.6.8 on page 11 (ECN 8958). Added section 6.10 on page 12 (ECN8958).	B	11/04/2019
5	Add note to section 3.15.1 referring to the United Nations Sustainable Development Goals (SDG's). (ECN9280)	C	03/02/2021
14 & 15	Added section on Modern Slavery (ECN 9460).	D	20/10/2021

COMPANY PROPRIETARY INFORMATION

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