

Corporate Responsibility Policy

SANDERSON WATTS ASSOCIATES LIMITED

GENERAL STATEMENT OF POLICY

The Board of Directors recognise that the company's activities impact society as a whole and are committed to maximising the positive effect and minimising the negative effect of our operation and safeguarding the best interests of our clients, employees, suppliers and wider community.

The principles are outlined below:

- 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.
- Clients' interests will be served by offering a value based service where attention to detail and meeting Client requirements are paramount.
- We will treat everyone who comes into contact with the company equally and with fairness and respect at all times.
- All recruitment practices will be carried out fairly, consistently and be inclusive.
- Our employees will be treated in an equitable manner in terms of remuneration and conditions, ensuring that opportunities for development and training are made available to all.
- We will endeavour to meet the interests of the local community by creating local employment opportunities, protecting the local environment and on a wider scale, and through the benefits of our project designs.
- We will endeavour through our engineering design processes to influence the environmental impact of our clients' projects using innovation and best practice.
- We are committed to creating and maintaining a safe and healthy working environment for our employees as documented in our Health and Safety Policy.
- All employees of SWA will comply with the law and applicable regulations wherever they do business. Appropriate training to undertake this will be provided for employees as necessary.
- We will comply with all regulations governing ethics, bribery and corruption.
- We will comply with security and data protection requirements wherever we do business.
- We will implement effective systems and controls to prevent slavery and human trafficking in our business operation and to in so far as reasonably possible ensure that our supply chain is free from slavery and human trafficking.
- Shareholders will take an active role in ensuring the appropriate actions of the Board of Directors.
- We will endeavour to make continual improvements in all aspects of our corporate responsibility.

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ETHICS POLICY

In General

This ethics policy is led and actively promoted by the Board of Directors and defines the standards of professionalism and integrity to be maintained by the all employees.

Business Principles

- All aspects of our business operations shall be undertaken with integrity.
- All aspects of our business operations shall comply with current legislation and best practice.
- SWA accounting and other records shall accurately describe and reflect the nature of the underlying transactions.
- SWA will not facilitate, support, tolerate or condone any form of money laundering.
- Discrimination or harassment will not be tolerated.
- Legal and moral rights of others will be fully respected.
- We will not knowingly make misrepresentations.
- We do not make political donations.
- No employee shall accept or give bribes, gifts, favours or anything of value for improper purposes to obtain or retain business or any other benefit.
- Conflicts of interest must be reported to a company Director.
- Employees are encouraged to report suspected wrongdoings

Business Operations

- Upon request clients will be provided with factual information with respect to prices, rates, programmes and services.
- Suppliers and subcontractors will be treated fairly and honestly in accordance with agreed terms.
- Confidential information from clients will be safeguarded in accordance with specific requirements.
- Clients, Suppliers and subcontractor complaints will be investigated fairly and promptly.
- We will not infringe copyright, trademarks, patents or intellectual property rights of others.

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ANTI-BRIBERY

It is our policy to carry out business fairly, honestly and openly. As such we have a zero tolerance approach towards bribery. To meet this commitment the Business has the following systems in place:

- Tendering activities are reviewed to assess the levels of risk to which the Business is exposed.
- A clear entertainment and expenses policy that sets out that only reasonable hospitality, entertaining and gift giving expenses will be accommodated by the Business and should not induce either party to contract.
- A Whistleblowing Policy. If you are concerned that bribery has occurred, may occur or is likely to occur we would encourage you to report your concerns.

If you suspect or if you are asked to accept or offer a bribe you must report this immediately to a Director.

Gifts and Entertainment

Special care must be taken in the giving or receiving of gifts/entertainment. This is not permitted if it would create a real or perceived conflict of interest. The exchange of social courtesies is acceptable when there is a clear business purpose and they remain within good taste.

The giving of gift and or entertainment must be authorised and accounted for. If you are in doubt as to whether gifts or entertainment are appropriate, you should raise your concerns with Senior Management prior to accepting or giving any such gift or entertainment.

Conflicts of Interest

Conflicts of interest occurs when an individual's personal interests interfere with their ability to make unbiased business decisions. Actions by employees should be objective and be based on sound business judgement, not motivated by personal gain. The guidelines below cannot cover every eventuality; however a number of potential areas of conflict are identified.

- Conflict between personal interests and the company's interests must be avoided.
- Employees should declare to the Managing Director any interest they (or a close family member) may have in other businesses that the Company may deal or compete with (ignoring a shareholding in a major company, so long as such investment does not create a conflict of interest).
- Employees must obtain written approval from the Managing Director prior to accepting a second job, consultancy, appointment to the Board of another Company or other form of work. In any event conflict with the interests of SWA should not arise.
- Undertaking private work or establishing intellectual property in the same or a similar area of business is not permitted without the express consent of the Managing Director.
- If an employee suspects they have a conflict of interest, whether actual or potential, they must raise their concerns immediately with their line manager. Employees should take no part nor seek to influence a business decision which may result in a conflict of interest arising.

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Human Rights

The Company supports 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:

- We will treat all employees fairly and honestly, regardless of where they work and will have agreed terms and conditions in accordance with local law or practice
- All employees will be given appropriate job skills training.
- We will pay a fair wage reflecting local markets and conditions. We will always meet national minimum wage.
- Working hours shall not be excessive. They shall comply with industry guidelines and national standards where they exist.
- 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. We respect the right of our employees to choose whether or not to join a trade union without influence or interference from management. Furthermore we support the right of our 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 in every country in which 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 formal grievance procedures through which staff can raise personal and work-related issues.
- Employees will be given reasonable access to clean bathroom and welfare facilities and clean water.
- We shall not tolerate bullying, or any form of harassment of employees in performance of their duties.

Ethical Purchasing

As civil and structural engineering consultants, SWA does not purchase a wide range of goods and services. However, it is our policy to ensure that they are from sources that fosters a culture of compliance with legal requirements, human rights, safety or the environment.

It is our aim to build mutually beneficial, long-term relationships with our suppliers, who share our commitment to conducting business with honesty and integrity.

We expect our suppliers 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 and relationship with us.
- Ensure that they adopt and implement acceptable safety, environmental, product quality, labour, human rights, social and legal standards in line with our own, and ensure these issues are acceptably managed with the supply chain for any products supplied to us.

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Community

Where practicable we will:

- Work with local authorities and businesses to promote quality of life.
- Offer employment opportunities to all sectors of the community through non-discriminatory policies and promoting opportunities to disadvantaged and vulnerable groups.
- Supporting local community groups and charities
- Improving the environment in and around our operations.
- Promote opportunities for workplace learning.

Modern Slavery

SWA recognises that it has a responsibility to take a robust approach to slavery and human trafficking. We are committed to maintaining and enforcing effective systems and controls to prevent slavery and human trafficking in our business activities, and to ensuring that our supply chain is free from slavery and human trafficking, in line with obligations under the Modern Slavery Act 2015.

The company is committed to taking all necessary steps to ensure the workforce who we and our suppliers engage is free from effects associated with modern slavery, human trafficking, forced or bonded/imprisoned labour.

Responsibility for reporting incidents of slavery

The detection and reporting of slavery is the responsibility of all individuals. You should raise any concerns about any issue or suspicion of modern slavery in any part of our business or supply chain at the earliest possible stage to a Director or via email: imsdeliverygroup@sandersonwatts.com. Suitable channels of communication by which you can report confidentially any suspicion of slavery are detailed in our whistleblowing procedure.

These policies apply to all employees, contractors and those parties in our supply chain wherever in the world they operate. The policies will be regularly reviewed and updated to meet the requirements of legislation and needs of our company, our clients and suppliers.

Any reported breach of this policy will be investigated and may lead to legal proceedings or disciplinary action.

Signed
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E Webb
Managing Director

Date: **March 2019**