



## **CORPORATE SOCIAL RESPONSIBILITY POLICY**

ETS Group seeks to be a good corporate citizen in everything that it does.

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 Companies operations and have been developed and continue to be reviewed against and updated by reference to relevant codes.

The ETS Group Board of Directors 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 for ETS Group and provide practical guidance for our managers and employees on the ground.

### **Compliance, monitoring and reporting**

Compliance with this policy will be continuously monitored and is subject to review by the Management Team of ETS Group, supported by the Quality Manager. Compliance will be reported to Directors at the Annual Business Review Meeting.

Employees who reasonably suspect that there has been a breach of this policy must report it to their line manager or Managing Director. 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.

The Board of ETS Group will not criticise management for any loss of business resulting from adherence to the principles set out in this policy. All sections of this policy are underpinned by the Companies Code of Business Ethics, which is set out in Section 1. The other areas covered by this policy are Safety and Security (Section 2), Employment (Section 3), Customer and Community (Section 4) and Environment (Section 5).

## **SECTION 1**

### **CODE OF BUSINESS ETHICS**

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

#### **1.1 Basic Standards of Conduct**

- a) 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.
- b) We will respect the legitimate interests of third parties with whom we have dealings in the course of our business.
- c) 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.

## **1.2 Employees**

ETS Group

- a) is committed to creating and maintaining a safe and healthy working environment for its employees.
- b) will strive to create a workplace in which there is mutual trust and respect and where every person feels responsible for the performance and reputation of our company.
- c) will 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 the properly elected representatives of its employees.
- d) will work towards achieving a diverse workforce, recruiting, employing and promoting employees only on the basis of objective criteria and the qualifications and abilities needed for the job to be performed.
- e) will maintain good communications with employees through our information and consultation procedures.
- f) will assist employees in realising their potential.

## **1.3 Customers**

- a) ETS Group is committed to providing safe, value for money, high quality, and consistent, accessible and reliable services to its customers.

## **1.4 Shareholders**

- a) ETS Group will conduct its operations in accordance with the principles of good corporate governance.
- b) We will provide timely, regular and reliable information on the business to all our shareholders.

### **1.5 Business Partners and Stakeholders**

- a) We aim to develop strong relationships with our suppliers, stakeholders and others with whom we have dealings, based on mutual trust, understanding and respect.
- b) In those dealings, we expect our partners to adhere to business principles consistent with our own.
- c) ETS Group will conduct their operations in accordance with the principles of fair competition and applicable regulations.

### **1.6 Compliance with Law**

- a) ETS Group will comply with the laws and regulations applicable wherever they do business.
- b) Appropriate training will be provided for employees as necessary.

### **1.7 Business Integrity**

- a) ETS Group 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 or the Managing Director.
- b) ETS Group accounting and other records and supporting documents will accurately describe and reflect the nature of the underlying transactions.
- c) No undisclosed or unrecorded account, fund or asset will be established or maintained.
- d) ETS Group will not facilitate, support, tolerate or condone any form of money laundering.

### **1.8 The Environment**

- a) ETS Group is committed to making continuous improvement in the management of its environmental impact.
- b) We will work with our partners to promote environmental care, increase understanding of environmental issues and disseminate good practice.

## **1.9 Community Involvement**

- a) ETS Group strives to be a good corporate citizen and to fulfil our responsibilities to the societies and communities in which we operate.

## **1.10 Conflicts of interest and confidentiality**

- a) Whilst ETS Group respects the privacy of its employees, all ETS Group employees are expected to avoid personal activities and financial interests, which could conflict with their responsibilities to ETS Group.
- b) ETS Group employees and consultants must not seek gain for themselves or others through misuse of their positions or company property.
- c) 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.
- d) 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.
- e) Where information is confidential, that confidentiality must be respected.

## **SECTION 2**

### **SAFETY AND SECURITY**

#### **2.1 Safety**

The health and safety of our employees and customers is our paramount concern. Safety underpins all our operations and our central motto is "If you cannot do it safely, don't do it".

**Our health and safety policy, which is published separately, underpins these aims.**

#### **2.2 Security**

- a) **General Statement**

Security is a key issue for our clients, our staff and our business. We recognise the range of security issues which can arise and have implemented the following high level security policy.

- b) The Board of Directors of ETS Group is committed to ensuring, so far as is reasonably practicable, the security of clients using our services, our employees at work and our property.
- c) The threats to security are wide ranging, but insignificant 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 which apply. To be successful in this we need the co-operation and engagement of all of our staff our clients and suppliers.
- d) Security is an area in which we seek continuous development and improvement and compliance with existing and emerging legislation. We will heighten the profile of security to ensure all members of staff understand why they should and how they can play their part. Our efforts will bring greater personal and corporate security and business benefit.
- e) 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, our clients and our property.
- f) We aim to achieve, so far as is reasonably practicable:-
  - A secure environment for clients using our services
  - A secure environment for staff in their work
  - Security of our property
  - Security of our systems and processes
- g) We will develop systems to monitor our performance on security within our operations. All operations will be subject to periodic inspection and review.
- h) ETS Group 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:
- i) A security strategy is in place, which underpins our policy, identifies the key strategic security issues for the business and the approach being taken to address these. This is designed to provide a structure, which allows measurement, review and ongoing refinement.

- j) We also require contractors to comply with this policy whilst they are working at our premises.

## **SECTION 3 EMPLOYMENT**

### **3.1 Equal Opportunities and Diversity Policy**

See our separate policy

### **3.2 Human Rights**

- a) ETD Group 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 in respect of our staff.
- b) 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.
- c) We will pay a fair wage reflecting local markets and conditions. We will always meet the national minimum wage.
- d) Working hours shall not be excessive and they shall comply with national standards.
- e) We will not employ illegal child labour, forced or bonded labour, forced overtime or condone illegal child labour.
- f) 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.
- g) We will negotiate in good faith with the properly elected representatives of our employees.
- h) We will abide by the non-discrimination laws in every country where we operate.
- i) 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.
- j) We have formal grievance procedures through which staff can raise personal and work-related issues.

### **3.3 Data Protection**

- a) We will comply with the relevant principles governing data protection.

## **SECTION 4**

### **CUSTOMER AND COMMUNITY**

#### **4.1 Customers**

Our vision is to become the premier asbestos consultant in the UK. By aiming for the top in everything that we do, and helping each other, we can deliver the highest levels of safety and service and give greater customer and employee satisfaction.

We will –

- act in accordance with fair business, marketing and advertising practices and take all reasonable steps to ensure the safety of our services
- provide transparent and effective procedures that address customer complaints and contribute to fair and timely resolution of disputes without undue cost or burden
- not make representations or omissions nor engage in any other practices that are deceptive, misleading, fraudulent or unfair
- respect client privacy and provide protection for personal data in accordance with the law.

#### **4.2 Suppliers**

##### **Ethical Purchasing Policy**

- a) We purchase a small range of goods and services required in the operation of our business. Yet a good working relationship with our suppliers is still important to our business.
- b) We are committed to obtaining and retaining competitive goods and services while at the same time ensuring they are from sources which have not jeopardised human rights, safety or the environment.
- c) We aim to develop strong relationships with our suppliers, based on mutual trust, understanding and respect.
- d) More specifically 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 relationship with us.
- Ensure they adopt and implement acceptable safety, environmental, product quality, product stewardship, labour, human rights, social and legal standards in line with our own code and to ensure these issues are acceptably managed within the supply chain for any products supplied to us.

e) We will seek to work with our key suppliers to:

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

### **4.3 Community**

We will look to support communities within which we operate. We also operate from a number of properties and have responsibility to those living and working nearby as well as being an employer.

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

- Engagement with the local communities in which we operate on the quality of our services;
- 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;
- Promoting broader opportunities for workplace learning;
- Supporting local initiatives for the development and education of young people in the areas we serve;

## SECTION 5 ENVIRONMENT

See our separate **Environmental Policy**

### Climate Change Policy

We are committed to reducing the greenhouse gas emissions from our operations in a way which supports national government strategies, where possible employees will car share and utilise public transport

Our key climate change commitments are:

- To assess the potential impact to our business from evolving climate change policies as part of our on-going risk management processes.
- To select vehicles on the basis of fuel efficiency.
- To actively promote improved energy efficiency and fuel efficiency within our business.
- To stay abreast of alternative fuel developments and continue to assess their commercial viability.

### 5.2 Biodiversity Policy

Our policy in respect of conserving and promoting biodiversity reflects our commitment to furthering the aims of sustainable development in the management and development of our business. All businesses affect biodiversity through the use of resources and discharge of waste products. This Biodiversity Policy is therefore consistent with our broader Environmental Policy, which includes a stated commitment to minimise the environmental impacts of our operations and prevent pollution.

Our policy is to strive to enhance biodiversity where practicable.

For ETS Group



**Mark Cole**

**Managing Director**

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