

C Spencer Ltd
Business Ethics Policy

Introduction

The Board is committed to ensuring the ethical conduct of C Spencer Ltd (the Company) and the highest standards of integrity from all its Employees. All Employees are expected to adhere to the policy guidelines in all actions and works undertaken on behalf of the Company. Any violations of the Company policies will be thoroughly investigated and where necessary disciplinary or remedial action may be taken.

Our Values

Our core values are an integral part of C Spencer Ltd and guide the ethics and operations of the Company as a whole. They are:

1) Safety Comes First

Health and Safety:

C Spencer Ltd recognises that, as an engineering contractor, all of its activities can impact upon the Occupational Health and Safety of its Employees, Contractors, Clients and the general public. Consequently, the assessment and control of occupational health and safety risks is regarded as an integral component of business operations. It is our policy to at least comply with relevant legislation and other applicable requirements; and continually improve occupational health and safety performance.

Alcohol and Drugs:

The Company has a policy of zero tolerance to alcohol and drugs abuse on all work sites. The Company will take reasonable steps to ensure that Employees are not under the influence of alcohol, drugs, or any other "substance" which may pose a risk to their, or others health and safety, damage property, or damage the integrity and reputation of the Company in the eyes of stakeholders, e.g. Employees, Customers, Suppliers, outside bodies etc. All persons entering a work site under the control of the Company will be required to undertake random testing if selected. A refusal to consent will be deemed as a positive test result. Any transgressions of this policy will be considered gross misconduct.

Smoking on sites and in Offices is prohibited. Employees must only smoke in designated outdoor areas and must dispose of rubbish in the provided receptacles.

Data Protection:

All Employees must adhere to all legislation regarding the handling, use, communication and storage of information. Employees may under certain conditions view information the Company has on them if they submit a written request. The Company will fulfil its obligations under the Data Protection Act to the fullest extent.

Whistleblowing:

Employees must promptly report to the Company any violations of law or ethical principles or Company policies that come to the employee's attention. The Company takes allegations of wrongdoing, or malpractice (in any form) very seriously and therefore seeks to ensure that Employees, acting in good faith, who genuinely believe that wrongdoing is evident, are able to disclose the information without fear of detriment or victimisation, and in confidence. In line with their rights provided by the **Public Interest Disclosure Act 1998**, all Employees are encouraged to be open about their concerns, and to express them at the earliest opportunity.

2) Delivering Excellence

Employee Conduct:

Employees are expected to present and conduct themselves professionally to Clients, Customers and all stakeholders, both inside and outside the workplace and where required maintain and wear the appropriate Personal Protective Equipment (PPE).

Whilst at work Employees must devote their whole time, attention and abilities to their duties. All Employees are required to conduct Company business honestly, professionally and with integrity at all times. They must comply with all legal requirements and internal policies and procedures that apply to the duties assigned to them as an Employee. Employees should also avoid any activities that could involve or lead to involvement in any unlawful practice and should at no time make or take payments for or on behalf of the Company.

Conflicts of Interests:

Employees must avoid actual or potential conflicts of interests in transactions on behalf of the Company and not at any time during their employment, engage or become interested in, any trade, business or occupation which in any way conflicts with the Company's interest and activities.

Employees must follow all Company policies and procedures regarding the giving and receiving of gifts and hospitality to ensure that neither they, nor the Company, may face allegations of malpractice or corruption in their business dealings.

Under no circumstances should any Employee use Company funds, time or resources in support of, or undertake any action which could lead the Company to be linked with or affiliated to, any political party, group, organisation or company, without the express prior written consent of the Board.

Company Information:

All Employees must ensure the security and responsible use of any and all Company information. Employees must not, whilst employed and for two years after employment, disclose or use any information relating to the Company's secret processes of research, development, manufacture or design, or any other information of a sufficiently high degree of confidentiality to amount to a trade secret.

Where Employees no longer work for the Company they must immediately return all items, documents and information they may possess and must not attempt (in whatever fashion) to entice Clients, Customers (current and past), Employees or any form of business away from the Company.

Communication:

All Employees are expected to communicate in an appropriate and professional manner and following all Company procedures and policies. Employees must only use communication methods, equipment and software approved for use by the Company. All IT equipment or mobiles provided by the Company are for use on Company business only. Employees must not infringe on copyright or communicate anything which could cause liability for themselves or the Company. The Company randomly undertakes audits to ensure that no inappropriate software or files are stored on Company computers. If anything prohibited is found the Employee is liable for disciplinary action.

Employees must not, unless specifically authorised to do so, make any commitments in communications on behalf of themselves or the Company and should keep a copy of all important communications between themselves and other parties.

All external communications and enquiries regarding the Company must go through the Media Coordinator and approved by the Board. Under no circumstances should Employees

discuss the Company or its business operations with any member of the media without the prior express permission of the Company.

3) Developing Creativity and Innovation

C Spencer Ltd believes that the strength of our Organisation stems from the people in it and is therefore committed to their development and building knowledge sharing throughout the Company.

Induction:

The Company provides a carefully constructed induction to ensure employees feel fully acquainted with their work situation, colleagues and the Company policies and that therefore they have all the tools they need to start their career with us.

Employee Development:

To ensure the continual development of Employees, all Staff have a bi-annual review with their designated Personal Development Manager based on their behaviours and role performance. This review is also an opportunity for the Employee to discuss their future career plans and create their Personal Development Plan. It is also a chance for the Company to recognise, reward and encourage creativity and innovation.

4) Respect for Others

Corporate Social Responsibility (CSR):

This policy is interwoven throughout the Company's policies and procedures and demonstrated in our operations. Employees are encouraged to contribute their ideas and time to various initiatives and charity events. The CSR policy focuses on four key areas:

a) Community

C Spencer Ltd strive to establish and maintain positive relationships with the communities in which we operate, aiming to engage at different levels as neighbours, clients, potential customers and employees.

We also aim where possible to support our Employees in their charitable endeavours and local community groups.

b) The Workplace

The Company does not tolerate any form of discrimination (direct or indirect), harassment, bullying, victimisation or anything which could undermine an Employee's dignity or wellbeing at work. The Company actively encourages an environment of mutual and professional respect and courtesy for all Employees, Customers, Clients, Contractors and Subcontractors. Any violation of this policy will result in a thorough investigation and where necessary disciplinary action.

C Spencer Ltd aims to adhere to the principles of the United Nations Declaration of Human Rights, to ensure that all stakeholders and others are respected in all aspects of our business operations. Any abuse of an individual's or group's rights or dignity will not be tolerated. In order to ensure this we expect all Employees to comply with our Company policies and all relevant legislation.

c) The Marketplace

The Board is committed to ensuring compliance with all legislation regarding competition. All Employees must follow Company policies and procedures regarding this area and any failure to comply may result in disciplinary action.

d) The Environment

The Company also recognises that all of its activities can have both global and local impact upon the environment arising from the consumption of raw materials and energy, transport and emissions to air, land and water. Consequently, protecting and enhancing the environment by preventing pollution is regarded as a vital part of business planning and operations and it is our policy to invest and operate in a way to ensure this is not compromised.

C Spencer Ltd Company Policies

More detail regarding these Company policies can be found in the Employee Handbook (available on the Spencer intranet or from the HR department at Head Office) or directly from HR. Policies include:

- Company Values
- Code of Conduct
- Data Protection
- Communication
- IT and Equipment Use
- Equal Opportunities
- Occupational Health and Safety
- Environmental
- CSR
- Whistleblowing
- Personal Development