



POLICY 004: Corporate Social Responsibility

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Contents

1	Purpose.....	3
2	Scope.....	3
3	Statement.....	3
4	Social Responsibility.....	4
4.1	Personnel	4
4.2	Clients.....	5
4.3	Suppliers & Subcontractors.....	5
4.4	Working Safely in Communities.....	5
4.5	Environmental Protection / Sustainability	6
4.6	Quality and Standards	6
4.7	Client Confidentiality.....	6

CORPORATE SOCIAL RESPONSIBILITY

1 Purpose

Corporate Social Responsibility (CSR) refers to the way in which businesses regulate themselves in order to ensure that their activities positively affect the communities with which they interact and society as a whole.

Veriflo seeks to display excellence in every aspect of its business undertaking, and is committed to keeping the social, environmental, and ethical impacts of our operations and our supply chain as positive as possible. To this end, the Company implements policies and procedures to ensure that work is carried out ethically, considering human rights as well as the social, economic, and environmental impacts of the business.

The Company aims to meet and exceed all relevant legislation, and where legislation does not exist, to carry out perceived best practices in pursuit of this goal.

2 Scope

This policy applies to all of the Company's undertakings, the methods used to achieve them, and to the responsible and considered business practices put in place to maintain a positive social presence throughout operations.

Veriflo considers compliance with this policy to be the responsibility of all individuals who take part in the Company's operations and activities. This policy shall apply to all Company-controlled sites and premises and will be communicated to all employees in order to keep the awareness and commitment at a high level. The Directors will report on performance as required and this Policy will be reviewed on an annual basis.

3 Statement

Veriflo is committed to ensuring a high standard of ethical trade practices across its commissioning and procurement activities. Veriflo seeks to maintain a sustainable business model, to continue to grow and improve operations, whilst keeping environmental impacts to a minimum.

The Company requests supplier organisations to observe the policy's provisions and to demonstrate a similar commitment to an ongoing programme of ensuring and improving ethical and sustainable practices locally and globally.

In support of these aims, and to improving operations, Veriflo have implemented specific policies and procedures to address these challenges.

- **Procedure 013: Sustainability** – Veriflo's sustainability initiatives, including environmental, ethical, and social factors.
- **Procedure 008: Responsible Procurement** – Veriflo's engagement with the supply chain and client procurement initiatives
- **Procedure 012: Supply Chain Assurance** – The Company's measures to ensure that supply partners are managed effectively and able to display suitable standards
- **Procedure 017: Subcontractor management** – The Company's measures to categorise and manage relationships and compliance of subcontractor entities
- Business ethics and compliance policies and procedures have been implemented to structure the Company's Ethical Business Model including; Anti Bribery, Anti-Tax Evasion, Equity, Recruitment, Whistleblowing and supporting policies.

4 Social Responsibility

The Company is committed to being a responsible business that grows and develops sustainably, undertaking works in a responsible manner that achieves and maintains the highest standards and minimises the negative impacts on society and the environment in accordance with company values.

The Company's goal is to make a net positive contribution to society such that operations;

- contribute to sustainable development, including health and the welfare of society where possible
- consider the needs and expectations of key stakeholders including clients, employees, supply chain and the communities in which we operate.
- remain compliant with applicable law, align with industry best practices, and integrate best practice throughout the organisation

There are 3 main areas where the Company can impact the lives and communities in which they operate;

- Protection of the natural environment
- Recruitment, protection, development, and support of employees
- Health, safety, and wellbeing of employees and those affected by their operations

The Company will, where possible;

- Support local economies through presence, purchasing and employment
- Observe all employment regulations, demonstrating best practice in recruitment and employee conditions
- Observe client and industry-led safety and considerate conduct initiatives in operating locations
- Encourage and support employees who become involved in community and charitable projects
- Create partnerships which have a positive impact on the wider community
- Inspire and engage with customers and the supply chain to partner on community projects and initiatives
- Offer support for employees to undertake sponsored or charitable activities
- Pursue carbon neutrality, such that the sum of Company activities does no lasting environmental damage

4.1 Personnel

The Company strives to provide and maintain a safe and positive working environment;

- To abide by and seek to exceed the requirements of the Human Rights Act 2010, the Modern Slavery Act 2015 and related legislation.
- To verify the legal employment status of all personnel in line with the Immigration, Asylum and Nationality Act 2006, and keep suitable records.
- Through a rigorous recruitment procedure and Equity and Diversity Policy, support fair treatment and ethical standards for employees
- Commitment to equal opportunities and the principle of equity regardless of race, creed, colour, nationality, sex, disability, age, gender re-assignment or sexual orientation.
- To not condone any discriminatory act or attitude in the conduct of business with the public or personnel. Acts of harassment or discrimination are disciplinary offences.
- To work to exceed the requirements of the Health and Safety at Work Act and appended legislation. Through application of H&S Policies and Safe Systems of Work, seek to provide a positive and safe working environment to ensure all employees return home safe each day.
- Professional development is supported to provide employees with excellence in competence and supervision and to satisfy client requirements.
- Perform consultation meetings, open consultation, and establishment of a positive approach to H&S to maximise employee participation and promote positive culture.

- Implement Anti-Tax evasion, Anti-Bribery and Corruption and Whistleblowing Policies to control these risks, ensure fair treatment and confidential grievance reporting. The disciplinary code exists to ensure all employees have the right to be represented at formal investigations.
- Working hours will comply with legislation and are allocated on an equitable basis to ensure the demands on employees are reasonable and duly compensated. Supervisors are required to ensure adequate breaks for all employees.

4.2 Clients

The Company aims to engage with clients to build positive and productive working relationships;

- Proliferation of and adherence to client-led initiatives, safety and working practices which seek to improve best practice in the industry
- Adherence to the requirements of supply chain best practices, alignment with sustainability initiatives and ethical sourcing of products
- Rigorous quality and works control procedures; auditing and non-conformance reporting to maintain and improve the highest standards of works quality
- A commitment to clear communication with clients; reporting options for works that are undertaken can be tailored to client requirements.
- Maintained strict confidentiality with all information handling including client details.

4.3 Suppliers & Subcontractors

Expecting the highest standards of ethical trading throughout our supply chain;

- Adherence to Responsible Procurement, and Anti-Slavery Policy commitments
- Support the proliferation of sustainable procurement initiatives; and where appropriate, selection of suppliers who adhere to relevant standards e.g. FSC, PEFC
- Adherence to Anti-Bribery and Corruption Policy commitments
- The preference for local suppliers to improve the Company's ecological procurement profile
- Preference for suppliers demonstrating support for responsible/sustainable supply chain initiatives
- Prequalification assessment and maintenance of an Approved Supplier List to ensure the supply chain upholds the promoted best practices

4.4 Working Safely in Communities

Works locations and processes are assessed and controlled to minimise the risk of harm to the general public, other road users and the communities in which the Company operates;

- The safety of all persons, especially the public, is considered in all work performed.
- Adherence to best practices of Safety at Street Works and Road Works ACoP (red book) for all works impacting the public highway. Traffic management to reduce risks to road users.
- Establishment of suitable and sufficient barriers, signage, lighting and guarding of all hazardous operations.
- Establishment of safe pedestrian routes around Veriflo operating locations
- Assessment and control of noise, vibration, odour, dusts, fumes, and any other by-product of working processes with action taken to minimise the public impact

4.5 Environmental Protection / Sustainability

Through the proliferation and adherence to Environmental & Sustainability Policies and organisation, seek align with the standards of ISO 14001 accreditation, and to exhibit environmental best practice;

- All jobs assessed at preliminary stages and throughout the works duration to ensure that the Company Reduces, Re-uses and Recycles wherever possible.
- Employees are encouraged to walk, cycle, car share or use public transport to get to work.
- Employees are scheduled to minimise commuting distances
- Efforts are made to ensure that all company vehicles are as energy efficient as possible
- Strict waste handling procedures are observed for all hazardous and non-hazardous wastes produced and professional verified waste handling contractors will be used.
- All materials and substances used in the delivery of works will be COSHH assessed and suitably controlled.
- The Company will favour environmentally conscious product lines when procuring and will encourage customers to use these products through tendering and marketing activity
- Recording, analysing, and working to reduce Company carbon emissions profile
- Pursuit of carbon neutrality through the selection and collaboration with a suitable carbon offsetting company or similar organisation
- Selections of subcontractors and suppliers who are able to easily demonstrate adherence to necessary sustainability and environmental standards e.g. EUTR/UKTR

4.6 Quality and Standards

The Company maintains ISO:9001 accreditation through continued application of the systems and processes which have been established including; Quality Policy and supporting policies and procedures, business systems and the application of a culture of continuous improvement.

The Company operates this system to underpin the values and standards of the business and to provide assurance to all partner organisations that Veriflo operates in a robust and professional manner. The quality standard applies to all Company systems and processes and encompasses the Financial, Operational, Learning and Innovation aspects of the business.

4.7 Client Confidentiality

The Company understands that the nature of the business demands uncompromising confidentiality from all parties involved. Veriflo takes this responsibility very seriously and gives full commitment to every customer that client confidentiality is maintained at all times.

The Company will not use customers' or business partners' confidential information for personal gain, nor disclose it to third parties, unless authorised by the originator to do so or if required by law. All customer information received is treated as strictly confidential and will not be passed on to third parties. All information is collected lawfully for necessary business use and in accordance with the Data Protection Act 2018 and GDPR.

Kirsty Scott, Business Director, Veriflo Ltd.

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