

CORPORATE SOCIAL RESPONSIBILITY

Revision No	Date	Content	Revised By	Authorised By
1	12/08/2013	New	Les Robb	Warren Few
2	04/12/2013	Page 3, section one change to the last paragraph to include reference to Lee Warren. Pages 7 & 8, changes to the six aims of the company to reflect the continuing improvement programme	Les Robb	Warren Few



Lee Warren Fabrication and Design Ltd., has adopted the following policies and procedures to demonstrate its commitment to our Corporate Social Responsibility.

The Directors have fully endorsed the policies and procedures.

The following five headlines form part of our goals for achieving success.

- 1. Social Engagement and Ethical Trading**
- 2. People, Equality and Diversity**
- 3. Health and Safety**
- 4. Environmental**
- 5. Corporate Governance**

1. Social Engagement and Ethical Trading.

Lee Warren Fabrication and Design Ltd. Are aware of their responsibilities to the local communities, not only at their main place of work, but also where they are engaged in contract works at various locations in and around the London area. In appreciating their commitment they have develop the following initiatives to engage with the local communities

1. The offering of apprenticeships to the local communities in which they work.
2. Identifying training needs of the workforce and affording them the opportunity to uptake, this includes work related, health and safety, environmental and study towards professional qualifications and memberships.
3. The offering of work placement schemes to local schools, which have identified those who may wish to adopt a career in the workshops, design, draughtsperson and estimating departments.
4. Sponsorship of local good causes. Employees have recently taken part in various fundraising enterprises to support charities as, MacMillan Cancer Care, The Peace Hospice, Raise a Smile and Save the Children campaigns.
5. Client support, where we as subcontractors to various large enterprises assisted them in achieving high levels of compliance in Health and Safety and Environmental targets, which as a company, have been awarded several top awards in both fields.

Lee Warren Fabrication and Design Ltd. Agree to abide, as far as is reasonably practicable, by the Ethical Trading Initiative. This shall be achieved by the involvement of our workforce in decisions within the company that may affect employment terms and conditions. We shall also endeavour, by questionnaires and audits, to ascertain that our supply chain also abide by these Codes, as far as is reasonably practicable.

ETI Base Codes:-

1. Employment is freely chosen

1.1 There is no forced, bonded or involuntary prison labour.

1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

2. Freedom of association and the right to collective bargaining are respected

2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.

2.3 Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.

2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

3. Working conditions are safe and hygienic

3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

3.5 The company observing the code shall assign responsibility for health and safety to a senior management representative.

4. Child labour shall not be used

4.1 There shall be no new recruitment of child labour.

4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; "child" and "child labour" being defined in the appendices.

4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.

4.4 These policies and procedures shall conform to the provisions of the relevant ILO standards.

5. Living wages are paid

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

5.2 All workers shall be provided with written and understandable Information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

6. Working hours are not excessive

6.1 Working hours comply with national laws and benchmark industry standards, whichever affords greater protection.

6.2 In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7 day period on average. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

7. No discrimination is practised

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

8. Regular employment is provided

8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub- contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

9. No harsh or inhumane treatment is allowed

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

The provisions of this code constitute minimum and not maximum standards, and this code will not be used to prevent Lee Warren from exceeding these standards. Lee Warren, in applying this code, will comply with national and other applicable law and, where the provisions of law and this Base Code address the same subject, to apply that provision which affords the greater protection.

2. **People, Equality and Diversity.**

Diversity Practices:

Is integral to all working practices, employees are made aware of Diversity and Inclusion during their employment in appropriate ways, including, but not limited to, recruitment and induction, training and development, education assistance and leave of absences.

Responsibilities of Employees:

Whilst Lee Warren Fabrication and Design Limited accept responsibility for creating and the monitoring of a culture of equality of opportunity; its success relies upon each employee



playing their part. All employees are therefore considered responsible for the practical application of Lee Warrens Diversity and Inclusion Practices.

Employees have a personal responsibility to advise their Line Managers or Human Resources Manager, or to follow Grievance Procedures if there is any belief that discrimination of any kind has occurred.

Advertising vacancies – all vacancies are to be advertised internally in the first instance; if no internal applications received, the vacancy will be posted externally with a clear outline of the role and expectations. Selection criteria will be kept under review to ensure they are justifiable for the effective execution of the job and more than one person will be involved in the selection process.

Questions and selection tests shall relate to the requirements of the role and shall be carried out by staff appropriately trained. Any applicant for a post who wishes to declare they have a disability and who satisfies the job description and person specification will be offered an interview.

Training – Each employee has the right to expect not to be unreasonably discriminated against, either directly or indirectly, in opportunities to be trained, in how it is provided, where it is provided and in what medium.

Terms and Conditions of Employment – Lee Warren is committed to ensuring that they do not unreasonably discriminate against any individual in terms and conditions, both contractual and implied, within which they offer and provide employment.

Management responsibility –the management team have the responsibility to ensure that these practices are applied fully in their own areas. Any query relating to the application, interpretation should be discussed with Human Resources before any action being taken. Human Resources have the responsibility to ensure the maintenance and review of these practices.

EQUAL OPPORTUNITIES POLICY STATEMENT

Reference to Document No NC7000-701-017-004

3. Health and Safety.

Health and Safety Strategy has at its heart the concepts of Sensible Health and Safety and shows the company's commitment to continual improvement. Being "risk aware, not risk averse" is built into the Company's whole approach to managing risk in all aspects of its business. Sensible Health and Safety awareness will be the key in ensuring that managers can deliver on their service priorities whilst ensuring the risks are managed in a sensible, proportionate and legal way.

This strategy has been endorsed by the Managing Director; he supports the implementation of the Health and Safety Policy as it provides the direction for improvement of health and safety performance across all areas of our business activities.

This Strategy supports the company's six priorities and in particular supports the Priority of Maximizing Wellbeing by addressing the potential health and safety risks from the company's service delivery.

Priorities:

The aim of this strategy is to deliver improvements to the capacity for the company to handle risk effectively and produce a performance management framework that will enable it to demonstrate improvements made in the management of health and safety and the contribution that it makes to the overall handling of risk avoidance.

The principle health and safety Aims of the company are:-

1 Build a "Sensible Health and Safety" ethos into the company's health and safety culture

Desired outcomes;

- To raise the awareness of what sensible health and safety consists of.
- To develop oversight arrangement of occupational risk decisions to ensure that they are appropriate, legal and well balanced.
- To ensure that adequate safety management systems are implemented at all levels that enable Lee Warren to have the assurances that all parts of the organisation are adequately meeting their legal obligations and the corporate policies and standards.

2 Improve the way that health and safety performance is measured, monitored and recorded.

Desired outcomes;

- To identify key areas of health and safety performance.
- To identify the most effective and meaningful data, both reactive and proactive to measure our performance.
- To establish systems to measure, analyse and publish the data.
- To ensure that the data is used as part of the planning process to improve health and safety performance further (discussed at senior management meetings).
- To develop a consistent approach to auditing within and across departments, focusing on those key areas that influence improvements in health and safety performance.
- To measure the safety management systems adopted at all levels of the company against the HSE's Successful Health and Safety Management Guidance HSG 65.
- As part of a "learning organisation" to establish effective benchmarking.

3 Ensure that all people involved in delivery of the company's services have the appropriate levels of competency to address their health and safety responsibilities.

Desired outcomes;

- To ensure that all individuals, including elected members, senior managers, employees, volunteers and contractors/partners who help deliver the services have the level of competency to complete their role safely without causing unnecessary risk to others who could be affected.
- To ensure that any training or development necessary to achieve this is identified, quantified, planned and resourced to ensure that success in this aim is delivered.

- 4 Ensure that where the company contracts out work to other organisations or works in partnership with other organisations the occupational health and safety risks are properly and satisfactorily addressed.

Desired outcomes;

- To ensure that where the company supports activities undertaken by others, consideration of the adequacy of health and safety arrangements will be part of the process in selecting projects to support.
- To ensure that all work undertaken by or on behalf of the company (or where activities are led or supported by the company) that these are undertaken with appropriate levels of health and safety built in.

- 5 Develop leadership skills for Managers and Supervisors that improve the health and safety performance of the business.

Desired outcomes;

- To identify what good leadership in health and safety looks like, and, working with trainers and lead managers, communicate this to managers as part of the leadership competencies drive.
- Ensure that health and safety leadership skills and actions are developed for senior managers who operate at a strategic and policy level, for middle managers who operate at a planning and objective setting level and managers who operate at the service delivery or implementation level.

- 6 Ensure that the company is a “learning” organisation by improving the way health and safety incidents are recorded, investigated and how lessons learnt are communicated.

Desired outcomes;

- To provide improved ways to enable staff to report any safety related incidents to their manager, improve the number of incidents investigated and improve the quality of the investigations undertaken.
- To develop ways in which any useful lessons learnt either from other departments (Logistics, Construction or Security) or external organisations is communicated to other managers within a department and to other departments so that the maximum value is obtained and safety performance improved.

HEALTH & SAFETY POLICY STATEMENT

Reference to Document No. NC7000-701-015-003

4. Environmental.

Where Lee Warren Fabrication and Design Ltd. activities impact on the environment the effects of these activities shall be considered in respect to its locality so that any adverse effects may be identified, evaluated and addressed accordingly.

Lee Warren will prepare environmental procedures and guidance to meet the statutory requirements and where necessary prepare specific environmental impact assessments that will also comply with best practice and local environmental incentive schemes.

The major environmental impacts that Lee Warren has been identified:-

Noise

Use of F Gases in Air Conditioning Units (Workshops/Offices and Vehicles)

Dust

Vibration

Waste Removal (Construction/Workshops/Offices)

Energy Usage (Construction/Workshops/Offices)

Land Contamination – Construction/Workshop Waste/Substances

Water Usage/Pollution – Waste Material

Storage and use of fuels and oils (Minimal Impact)

Storage and use of chemicals e.g. paints (Minimal Impact)

Workplace traffic (Air Emissions)

Statutory Nuisance – Noise/Dust

Protection of Local Wildlife

Lee Warren will fully support the fundamental environmental objectives laid out within the company policy, with the aim of minimising the impact of the company's activities on the environment.

This will be done by having a company management system which will control the day to day environmental issues and monitor the effectiveness of the system.

As a company Lee Warren will appoint staff that are competent and are aware of the best practices and satisfactory requirements that are placed on our work. These people will be accountable for the practical application of the requirements of these procedures in the workplace. It is expected that all employees on their part are to contribute to achieving the targets of the company policy.

Lee Warren understand their duties as defined by the above legislation and aim to comply with the legislation by taking appropriate steps to prevent polluting material from work areas contaminating water, soil or air. A Project Specific Environmental Plan will be produced for each project, this will outline in detail all measures to be taken to minimise any impact on the environment.

Wherever possible hazardous and polluting materials will be kept to a minimum, unless large quantities of a single material are required urgently, otherwise materials will be supplied on demand. When materials are to be stored within the workplace they will be required to be segregated into special areas as is required by various legislation.

The appropriate manufacturers data sheet and COSHH assessment will be issued prior to use, which will detail the control measures to be put into place.

Also an overall emergency plan will be prepared to ensure appropriate procedures are in place to prevent and mitigate damage due to accidental releases, spillage's etc.

In the event of a pollutant being released prompt action will be taken by Lee Warren to minimise the effect in accordance with the appropriate emergency procedures. In the event



of an emergency the workplace management will be notified of what actions are to be taken and if-co-operation is required to secure the release and prevent exposure to personnel/property.

All accidental releases will be investigated by Lee Warren and the resulting report will be submitted to the Construction Manager. The incident report will propose corrective actions to be taken along with a timescale for them to be implemented.

ENVIRONMENTAL POLICY STATEMENT

Reference to Document No. NC7000-702-002-003

5. Corporate Governance

It is Lee Warren's policy to conduct business in an honest way and without the use of corrupt practices or acts of bribery to obtain an unfair advantage. The Company does not, directly or indirectly, offer, solicit, accept or receive any gift, payment or any other advantage from any person or organization in return for providing any improper business or other advantage.

Corruption can be defined as the abuse of public or private office for personal gain. It is important to note that corruption occurs even when there has not actually been a benefit but an expectation of one.

Bribery is a form of corruption. It can be defined as giving, promising, offering, requesting, agreeing to receive or the acceptance of any gift, fee or other reward, to or from any person (in government or business), as an incentive to do something that is dishonest, illegal, improper or a breach of trust.

Bribery can occur both actively and passively. Active bribery is when a person may seek to corrupt another by giving or attempting to make a bribe. Passive bribery is when a person may act corruptly by seeking, agreeing to accept, or by accepting a bribe.

Under UK law (UK Bribery Act 2010), bribery and corruption is punishable for individuals by up to 10 years imprisonment. If the Company is found to have taken part in the corruption or lacks adequate procedures to prevent bribery, it could face an unlimited fine, be excluded from tendering for Government contracts and face untold damage to its reputation.

This policy is fully supported by the Board of Directors and is to be communicated to everyone in our business to ensure their commitment to it. The Board attaches the utmost importance to this policy and will apply a zero tolerance approach to acts of bribery and corruption by any of our employees or third party representatives. Any breach of this policy will be regarded as a serious matter by the Company and is likely to result in disciplinary action.

This policy applies to individual employees, sub-contractors, consultants, agents, or any other people or bodies associated with Lee Warren or any of its subsidiaries and employees.

Understanding Specific Areas of Risk

While high profile cases of bribery, involving large sums of cash and senior executives are most likely to hit the headlines, bribery can be a risk in many areas of our industry:

- a. kickbacks and reciprocal agreements
- b. false claims



- c. corrupt third parties (including agents, consultants, contractors or sub-contractors)
- d. excessive gifts and hospitality
- e. Inadequate financial controls or record keeping.

Kickbacks and reciprocal agreements or any other form of 'quid pro quo' are never acceptable. We will not participate in cartels, cover pricing, bid-rigging or any form of collusion. We will never accept improper payments to obtain new business, retain existing business, or secure any improper advantage.

Corrupt third parties can include a range of people acting on our behalf such as agents, consultants, contractors or sub-contractors. We wish to work only with those who are committed to our standards and will undertake due diligence to ensure this. We will engage a third party only when there is a clear business rationale for doing so and with an appropriate contract. We will ensure all payments made to third parties are properly authorized and recorded.

Excessive gifts and hospitality can be used to exert improper influence on decision makers. We will only accept gifts and hospitality in accordance with this policy. We will ensure any gifts or hospitality we offer are reasonable in terms of value and frequency. We will never offer or accept gifts or hospitality if we feel it could influence a business decision or give the appearance of doing so.

Inadequate financial controls or record keeping can be exploited to hide bribes or corrupt practices. We will ensure we have robust controls in place so that our financial and other records are accurate and complete and never misleading.

Gifts and Hospitality

The Company appreciates that giving and receiving gifts or hospitality can help build goodwill in business relationships but they are only appropriate in limited circumstances.

In no circumstances should any employee offer, give or accept any gift or hospitality regardless of value, which might be construed as influencing a business decision.

You should consider the following points when you are faced with an opportunity to give or receive gifts or hospitality:

- a. What is your intention when offering a gift or hospitality or what do you think is the intention of the business partner when offering the same to you?
- b. Is the intention to build a business relationship or to influence a business decision such as the award of a tendered contract?
- c. Is the nature of the gift or hospitality modest or could it make you (as the recipient) feel under an obligation to give something back?
- d. Are you happy to justify giving or receiving the gift or hospitality? If it doesn't feel right, it probably isn't.

You must always seek prior approval from your Line Manager before offering or accepting any gift or hospitality.



There are some kinds of gifts or hospitality which should never be considered as acceptable. We have assessed that the following areas are of risk and as such, you should not give, offer, receive or approve any:

- a. Gifts or hospitality involving third parties involved in any competitive bid or tender process that you are – or may considered to be – involved in;
- b. Payments of cash (or cash equivalents) or paying someone else's personal bills or expenses;
- c. Any hospitality that may be considered indecent or inappropriate as part of a business relationship or which may have a negative effect on the Company's reputation; and
- d. Gifts or hospitality that you are not prepared to report or seek approval for internally irrespective of whether you use personal or company hospitality.

Record Keeping

No undisclosed or unrecorded account, fund or asset shall be established or maintained by any person or organisation. Full and proper records shall be kept of all transactions involving the Company. Supporting documents shall be readily available, genuine and shall accurately describe the nature of any transactions undertaken.

Conflict of Interest

You are required to avoid any contact that might lead to, or suggest, a conflict of interest between your personal activities and the business of the Company or its clients. All employees are required to disclose family links or other close relationships with a relevant decision maker in a client, supplier or competitor organisation; financial interests in a client, supplier or competitor organisation and activities on behalf of a client or another in such a way that the trust vested in the Company by a third party (client or other business partner) may be abused.

How to Raise a Concern

If you have a concern or know of or suspect a violation of this policy we want you to speak up immediately. Please don't ignore it. Speaking up can be a difficult thing to do, so be reassured that all information received will be treated seriously and investigated appropriately.

If you act in good faith, believing your information is accurate, we will protect you even if you are wrong. Doing the right thing will not disadvantage your career or adversely affect your relationships at work. And that is why we will not tolerate any form of discrimination or bullying of someone who has spoken up in good faith.

Some concerns can be addressed by speaking to the person whose conduct is a cause for concern. We understand that this is not always possible so we suggest that you speak to your supervisor or line manager. If, for whatever reason, you don't feel comfortable doing this, you can contact any member of the Human Resources.



We will treat your information in confidence and if you prefer, and the law allows it, you can report anonymously.

June, 2016

A handwritten signature in black ink, appearing to read 'wfe', enclosed in a light grey rectangular box.

Warren Few
Managing Director
Lee Warren Fabrication and Design Ltd.