

## **0.0 CORPORATE SOCIAL RESPONSIBILITY**

### **THE POLICY**

#### **Introduction**

SFM (UK) LTD is 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 Company's operations and have been developed and continue to be reviewed against and updated by reference to relevant codes governance and international standards including:

- The United Nations (UN) Universal Declaration of Human Rights
- The International Labour Organisation (ILO)
- Declaration on Fundamental Principles and Rights at Work
- The Guidelines for Multinational Enterprises established by the Organisation for Economic Cooperation and Development (OECD)
- The Rio Declaration on Environment and Development
- The UN Convention against Corruption.

The Directors of SFM (UK) LTD support the principles set out in those codes and standards. The aim of this policy is to translate that support into a set of guidelines and standards that set a common approach for SFM (UK) LTD 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 subject to review by the Managing Director and supported by the Directors. Compliance will be reported through the Company's Annual Report or its annual Corporate Social Responsibility Report. Each Manager is responsible for ensuring that the principles set out in this policy are communicated to, understood and observed by all employees and for ensuring compliance in their area of responsibility. Employees who reasonably suspect that there has been a breach of this policy must report it to their line manager or senior management in order for the report to be investigated and action taken in respect of such breaches.

We recognise that employees may be reluctant to report concerns for fear of possible 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.

### **SECTION 1 CODE OF BUSINESS ETHICS**

This Code of Business Ethics sets out the standards we expect from our employees in their internal and external dealings with colleagues, customers 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**

We are committed to:

- a. Developing a workforce where there is mutual trust and respect, free from bullying and harassment, where every person feels responsible for the performance and reputation of our company.
- b. Respecting the rights of individuals, their customs and traditions and their right to freedom of association.
- c. Recruiting, employing and promoting employees on the basis of objective criteria and the qualifications and abilities needed for the job to be performed in line with our Equal Opportunities Policy.
- d. Maintaining good communications with employees through our information and consultation procedures.
- e. Providing our employees with suitable training and assisting them in realising their potential.
- f. Ensuring the privacy and confidentiality of our employees' personal information is respected.
- g. Suitably rewarding our employees for their contribution to the success of the business.
- h. Providing mechanisms whereby employees can raise legitimate concerns confidentially, regarding malpractice and ensuring no one will be victimised for a report made in good faith.
- i. Providing employees with the appropriate information and training to comply with this Code and the associated policies.
- j. Seeking to protect our employees from third party abuse that might be injurious to their safety, health or well-being.

## **1.3 Business Integrity**

- 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 those with whom we do business to adhere to business principles consistent with our own.
- c. We will conduct our operations in accordance with the principles of fair competition and applicable regulations.
- d. SFM (UK) LTD's accounting and other records and supporting documents must accurately describe and reflect the nature of the underlying transactions.
- e. No unrecorded account, fund or asset will be established or maintained.
- f. We will comply with the laws and regulations applicable wherever we do business. We will obtain legal advice where felt necessary to comply with this commitment.
- g. We will review and track our business risks including social and environmental risks.
- h. SFM (UK) LTD will not facilitate, support, tolerate or condone any form of money laundering.
- i. To ensure that our business is run in an ethical and effective manner we will maintain internal controls in line with SFM (UK) LTD's Minimum Standards of Business Control.

#### **1.4 National and International Trade**

- a. We will seek to compete fairly and ethically within the framework of applicable competition and anti-trust laws and we will not prevent others from competing fairly with us.
- b. We will comply with all applicable export control laws and sanctions when conducting business around the world.

#### **1.5 Personal Conduct**

- a. All employees are expected to behave in accordance with the principles set out in this Code of Business Ethics.
- b. Employees are expected to protect and not misuse company assets such as buildings, vehicles, telephones, equipment, cash and procurement cards.
- c. Employees are expected to use e-mail, internet, IT and telephones in a manner appropriate for business purposes in line with the principles contained in this Code and any applicable IT policies.

#### **1.6 Bribery**

- a. No SFM (UK) LTD employee, individual or business working on our behalf must accept or give a bribe, facilitation payment or other improper payment for any reason.
- b. This applies to transactions with government officials, any private company or person anywhere in the world. It also applies whether the payment is made or received directly or through a third party.
- c. SFM (UK) LTD shall ensure that adequate procedures are in place to prevent the risk of bribery and that these are effectively communicated and implemented throughout in line with the requirements of the Bribery Act 2010.

#### **1.7 Gifts, Entertainment and Improper Payments**

- a. Accepting or giving any entertainment or gift that is designed to, or may be seen to influence business decisions, is not acceptable. No SFM (UK) LTD employee shall offer, give, seek or receive, either directly or indirectly, inducements or other improper advantages for business or financial gain. If an employee is in any doubt as to whether he or she may accept an offer/gift, that employee should discuss the issue with his or her line manager, Director or the Managing Director.
- b. Any gift or hospitality given or received by an employee should be reported for inclusion on the Company Hospitality and Gift Registers. In the UK this applies to any gift or hospitality with an estimated or actual value of £50 or more.

#### **1.8 Conflicts of Interest**

- a. Whilst we respect the privacy of our employees, all SFM (UK) LTD employees are expected to avoid personal relations, activities and financial interests, which could conflict with their responsibilities to SFM (UK) LTD.
- b. SFM (UK) LTD 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. Employees who have access to price sensitive information are prohibited from being involved in dealings in SFM (UK) LTD securities unless given clearance by the Managing Director. There should be no unauthorised disclosure of price sensitive information to third parties.

### **1.9 Confidentiality**

- a. 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.
- b. Where confidential information is obtained in the course of business that confidentiality must be respected.

### **1.10 Political Activity**

- a. SFM (UK) LTD does not make any donations to political parties or take part in party politics. However, when dealing with Government we do make legitimate concerns known and will seek to influence Governments in relation to issues that could affect us our customers or the local community.
- b. These relationships are conducted in accordance with this Code.

### **1.11 Health and Safety**

- a. We are committed to creating and maintaining a safe and healthy working environment for our employees, customers and the community.
- b. Our commitment to ensuring the safety and security of our employees is set out detailed Health and Safety Policy.
- c. We strive to avoid emergency situations but recognise the need to be prepared. We are committed to having effective emergency response procedures in place.

### **1.12 The Environment**

- a. SFM (UK) LTD is committed to making continuous improvement in the management of its environmental impact as set out in our Environmental Policy.
- b. All employees are expected to adhere to the requirements of the local environmental management system and support the improvement in our environmental performance.

### **1.13 Customers**

- a. SFM (UK) LTD is committed to providing safe, value for money, high quality, consistent, accessible and reliable services to its customers.
- b. All employees are expected to behave respectfully and honestly in all their dealings with customers and the general public in accordance with the principles set out in this Code.
- c. In particular we will safeguard and protect the welfare of vulnerable people who come into contact with our employees. Employees will be made aware that they hold a position of trust and that they must at all times maintain the highest standards of personal conduct that reflects this trust being placed with them.



#### **1.14 Shareholders**

- a. SFM (UK) LTD currently has a very limited number of shareholders but will abide by this code.
- b. SFM (UK) LTD will conduct its operations in accordance with the principles of good corporate governance.
- c. We will provide timely, regular and reliable information on the business to all shareholders.

#### **1.15 Supply Chain**

- a. Whilst SFM (UK) LTD only purchases a limited number of goods and services required in the operation of our business we do rely heavily on a number of contractors for the delivery of our core services. Good working relationships with our suppliers and contractors are therefore central to the success of our business.
- b. Whilst we are committed to obtaining and retaining competitive goods and services we will at the same time seek to ensure they are from sources that have not jeopardised human rights, safety or the environment.
- c. We expect our suppliers to adhere to business principles consistent with our own. We expect them to adopt and implement acceptable safety, environmental, product quality, product stewardship, labour, human rights, social and legal standards in line with our Supplier Code of Conduct.
- d. We will seek to work with our suppliers to develop long-term meaningful relationships to benefit both parties with the aim of improving the quality, environmental performance and sustainability of goods and services.

#### **1.16 Community Involvement**

- a. Our operations touch members of the community daily, whether as customers, neighbours, employees, businesses or residents. We are committed to fostering good relationships with the communities in which we work and building community partnerships that deliver positive change.

## **SECTION 2**

### **HEALTH & SAFETY AND SECURITY**

#### **2.1 Health & Safety Policy**

##### **General Statement**

Injury Prevention is our commitment to health and safety at SFM (UK) LTD. It is our core value and part of our way of life and applies to everything we do. Its purpose is to ensure the health and safety of all our employees, safety of our customers and safety of others affected by our businesses.

We believe that:

- All injuries are preventable
- Our goal is zero injuries

##### **Responsibility**

Injury Prevention is the responsibility of every employee and working safely is a condition of employment. Managing Directors, Operations Directors and Managers must ensure that all employees are safe at all times by ensuring:

- Our Injury Prevention processes are properly organised and appropriately resourced
- Staff are given information, instruction and training on risk assessment and Injury Prevention
- There is full compliance with Health and Safety laws and Company policies on Health and Safety
- PPE is available and worn at applicable points in time

##### **Monitoring and reporting**

We will monitor progress on Injury Prevention in all our operations and will conduct periodic audits to assess performance. In addition:

- The Operations Director will receive and review a report from each task conducted
- All serious incidents will be reported promptly to the Operations Director and Managing Director in order to be reviewed for future Injury Prevention actions

Remember: Injury Prevention – ‘If you cannot do it safely, don’t do it’.

#### **2.2 Injury Prevention Principles**

- a. What employees must do to keep themselves and others safe?
  - Prevent injury to themselves and to others
  - Be aware of any hazardous condition or practice that may cause injury to people or damage to property or the environment
  - Report any H&S issues immediately to their line manager
- b. Perform all necessary safety checks and risk assess within the work area and job before they commence with any work.
  - Speak to their supervisor or line manager before commencing work if they are unsure

- c. Follow all safety procedures, signs and instructions.
  - If they do not understand, they must speak with their supervisor or line manager before you start work
- d. Keep the work area clean and tidy at all times.
  - Untidy areas could cause injury to themselves or their colleagues and waste time and energy
- e. Wear PPE as required.
  - Keep PPE it in good condition
  - Wear PPE correctly
  - Replacement PPE if it becomes damaged or unfit for use
- f. Use only the correct tools and equipment that they are authorised and trained to use for the job. Check that they are in good condition before use and use them safely.
- g. Do not adjust or repair any piece of work equipment unless trained and authorised to do so.
  - Never modify any equipment, which changes the designed use of the equipment
- h. Before lifting, employees must assess the load and my capability to move it.
  - Make sure help is gained with any heavy or awkward items and follow the correct techniques for lifting and carrying
- i. Report all injuries, incidents and near misses to supervisors or line managers.
  - Always seek immediate help and first aid (if necessary)
- j. If employees have any suggestions to prevent injuries in my workplace, they should inform their supervisor or line manager

## **2.3 Security**

### **General Statement**

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

- a. The Managing Director and Directors of SFM (UK) LTD are committed to ensuring, so far as is reasonably practicable, the security of passengers using our services, our employees at work and our property.
- b. The threats to security are wide-ranging, significant and, in the main, driven by external influences.
- c. The ability to control risks varies. However, we have the ability to address or mitigate many of the threats, which apply. To be successful in this we need the co-operation and engagement of all of our staff.
- d. Security SOPs is an area in which we seek continuous development and improvement and compliance with existing and emerging legislation.
- 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 and our customers.

- f. We aim to achieve, so far as is reasonably practicable:
  - A secure environment for our employees
  - A secure environment for our staff in their work place
  - 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. The Operations Director will provide regular reports on the company security status to the Managing Director.
- i. SFM (UK) LTD 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.
- j. We are committed to operating in a safe and secure way. Within this commitment it is recognised that, despite our best efforts and perhaps due to events beyond our control, an emergency situation may occur. In these circumstances it is appropriate that, however remote the possibility, the business is able to respond effectively if such a situation does arise.
- k. SFM (UK) LTD has developed an overarching emergency response procedure, which applies in all of our constituent businesses. Our approach is designed to prioritise the needs of our customers and our staff who may become involved.

## **SECTION 3**

### **EMPLOYMENT**

Our employment policies cover all employees of SFM (UK) LTD and its contractors.

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

- a. The Directors of SFM (UK) LTD are committed to equality of opportunity both in the provision of services to the public and as an employer. This policy sets out SFM (UK) LTD's commitment to treat equally and with fairness at all times its employees, customers, contractors and those who come into contact with the company.
- b. We are committed to seeking continuous improvement and compliance with legislation based on the following principles.
  - Everyone has the right to be treated with dignity and respect
  - We will not discriminate on the grounds of race, gender, disability, nationality, religion, philosophical belief, political belief, age, sexual orientation, family status, trade union activity or any other factor
  - We will adopt fair and inclusive practices throughout our operations and will seek to eliminate all prejudice, discrimination, bullying and harassment
  - All employees have a personal responsibility for the practical application of this policy in their day-to-day activities and must support the policy at all times
  - Non-compliance with this policy will be treated seriously and will not be tolerated
- c. The Directors of SFM (UK) LTD and the Managing Directors are required to ensure:
  - They create a productive and safe working environment, promoting diversity and inclusion in their workforce
  - They develop new practices, as appropriate, to ensure all employees, contractors and customers are treated fairly
  - They can demonstrate continuous improvement in practices to promote diversity and equal opportunities for all

#### ***Legislation and Codes of Practice***

- (a) We will comply with and exceed where possible, current national and international legislation and relevant codes of practice in the countries where we operate. We will monitor our compliance with this policy and the requirements of relevant underpinning legislation as appropriate.

#### ***Partner Organisations***

- (b) We are committed to actively working with partner organisations to ensure our policies, procedures and practices are in line with best practice.

#### ***Practices and Standard Operating Procedures***

- (c) SFM (UK) LTD is committed to ensuring that we have the most up to date and effective set of operating instructions, which will be reviewed at regular intervals.

### ***Access to Company Premises***

- (d) SFM (UK) LTD will take all reasonable steps to ensure that our buildings and premises are accessible to disabled employees, customers and visitors as required by the Disability Discrimination Act (DDA) in the United Kingdom.

### ***Access to Information***

- (e) We will seek to ensure that information is made available to our customers and employees in alternative formats as required.

### ***Recruitment***

- (f) All recruitment will be carried out with regard to fairness, equality and consistency for all candidates at all times. Recruitment practices will be inclusive and we will endeavour to ensure there are no barriers to employment of suitable candidates.

### ***Staff Training***

- (g) We will provide our staff with the necessary guidance and training to ensure the effective implementation of this policy and to ensure we are an inclusive employer and service provider.

### ***Complaints***

- (h) Any employee who feels that he or she has grounds for complaint in relation to bullying, discrimination, harassment or victimisation has the right to pursue the complaint through our grievance procedures.
- (i) Customers who feel they have grounds for complaint may pursue these through our operating company customer complaints procedures. We will ensure our complaints/feedback procedures can be accessed and used by everyone.

### ***Reporting***

- (j) We are committed to monitoring and reporting on our actions and achievements in relation to implementing this policy both internally and externally where applicable.

### ***Audit***

- (k) We are committed to ensuring that our operations comply with the requirements of this policy and will periodically internally audit its implementation.

## **3.2 Human Rights**

SFM (UK) LTD 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:

- a. We will treat all employees fairly and honestly, regardless of where they work. All staff will have agreed terms and conditions in accordance with local law or practice and will be given appropriate job skills training.
- b. We will pay a fair wage reflecting local markets and conditions. We will always meet any national minimum wage.
- c. Working hours shall not be excessive. They shall comply with industry guidelines and national standards where they exist.

- d. We will not employ or condone illegal child labour, forced or bonded labour.
- e. Employees have the rights of freedom of association.
- f. We will abide by the non-discrimination laws in every country where we operate.
- g. We will not use or condone the use of corporal punishment, mental or physical coercion or verbal abuse.
- h. We have disciplinary procedures for any member of staff whose conduct falls below the required standard.
- i. We have formal grievance procedures through which staff can raise personal and work-related issues.
- j. All staff will be given reasonable access to bathroom and rest facilities.

### **3.3 Data Protection**

- a. We will comply with the relevant principles governing data protection in each country in which we operate.

## **SECTION 4**

### **CUSTOMER SERVICE**

#### **4.1 Customers**

Customer Service: Delivering our promise to our customers is one of our core values. Our commitment is to provide safe, reliable, customer focused, innovative and sustainable services.

We will:

- Act in accordance with fair business, marketing and advertising practices and take all reasonable steps to ensure the safety of our services
- Respect the human rights of our customers ensure our security and revenue protection arrangements are consistent with international standards for law enforcement
- 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 customer privacy and provide protection for personal data in accordance with the relevant local law

## **SECTION 5**

### **ENVIRONMENT**

#### **5.1 Environmental policy**

We are continually looking for ways to reduce the environmental impact due to our activities with the office and our travel impact. SFM (UK) LTD is dedicated to promoting awareness and decisions that contribute to achieving environmentally sustainable development.

We aim to reflect our commitment to delivering sustainability in our own business practices and through our values and policies. We recognise this to be a continuous process of improvement. We seek to improve our performance and that of our suppliers, over time.

The Environmental Policy expresses our commitment to achieving this aim within our own organisation.

#### **Our Commitment**

To deliver this Policy, our Management Team has the following objectives:

- To oversee and review our environmental policy and all of our purchasing practices and operations and to set the future direction of our environmental practices, conduct monitoring and seek continuous improvement in our environmental performance
- To set objectives, targets and programmes to improve our environmental performance, including sustainable sourcing, carbon management, preventing pollution and the pursuit of recognised environmental standards amongst our suppliers such as ISO14001 compliance and ensuring they have an Environmental Policy in place
- To comply with relevant legislative and regulatory requirements, identifying and applying the best available techniques wherever possible
- To provide information and appropriate training for and seek feedback from all staff on our environmental procedures and goals
- To regularly review and audit our environmental practices and work with partners to improve our performance and that of our industry generally
- To work towards the relevant certification(s) for a company of our size and industry
- To use our resources, to meet these commitments in a manner that reinforces our activities
- To measure our progress in pursuing these objectives

