



# Corporate and Social Responsibility Policy and Human Rights and Ethical Policy



# CORPORATE AND SOCIAL RESPONSIBILITY POLICY

## Overview

We acknowledge that running our business has an effect on society. In particular, we have a responsibility to our clients, our employees and contractors as well as the broader community in which we operate.

We are committed to taking responsibility for our actions and encourage a positive contribution towards improving standards for our clients and employees, minimising our impact on the environment and improving the quality of the local community.

By putting CSR into practice, we are committed, wherever possible, to:

- Conducting ourselves responsibly and in an ethical manner
- Creating a positive and supportive working environment
- Supporting local communities
- Improving service levels to clients
- Acting fairly in our dealings with suppliers and other third parties
- Minimising the impact on our environment.

# Communication

We communicate this policy to our staff, clients and other stakeholders by means of our website, publicity materials, and internal memos.

We provide our staff with training on our CSR strategy and this policy and seek to raise awareness of any negative impacts of our business and methods to reduce them.

# **Responsibility and review**

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Kathryn Jeffers, who is the firm's nominated officer, has overall responsibility for our CSR strategy and for implementing this policy. She has a key role in ensuring the systems and controls we have in place are effective.

All members of staff have a role to play in complying with our CSR objectives and are encouraged to make further suggestions in relation to initiatives we could undertake. If anyone has a suggestion, they should contact Kathryn Jeffers.

We are fully committed to the highest possible standards of openness, honesty and accountability. In line with that commitment, in accordance with our *Whistleblowing Policy*, we actively encourage all staff members who have serious concerns about any real or perceived departure from the high ethical standard that we set to voice those concerns openly. Our *Whistleblowing Policy* can be found *in our Office Manual*.

We are committed to ensuring our policy remains effective. As part of our ongoing commitment, this policy is reviewed at least annually to verify its effective operation. Records of the reviews are maintained and any necessary amendments are made to the policy, as appropriate.

# **Our CSR principles**

#### Our conduct

We aim to adopt the highest professional standards and not to act in such a way as to compromise our firm's integrity.

We actively promote respect between our staff members in their dealings with each other and with clients and other third parties.

#### Our working environment

We recognise that our staff are our most important resource. We actively seek to offer our staff a positive and healthy working environment and ensure that they have rewarding careers and job satisfaction.

We maintain an Office manual, which sets out the rights and expectations of all members of staff.

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We seek to ensure that all staff have access to the training they need both for their own development and to enable them to deliver a high quality service. Our procedures in relation to training and development can be found within our Office Manual.

We consider all staff members to be equal and we aim to create a working environment which is free of unlawful discrimination. In this regard, we maintain an <u>Equality and</u> <u>Diversity Policy</u>.

### Our community

In considering our impact on the community we have resolved to sponsor or otherwise support local charities.

We will allow members of staff time off work to enable them to carry out work in support of their chosen charity and to encourage dialogue with local communities and groups for mutual benefit.

### Our clients

We are committed to delivering a high level of service to all our clients. We understand that our business exists in a very competitive market and in order to retain our clients we need to deliver a professional and courteous service.

Wherever possible, we take steps to promote equal opportunity in relation to access to the legal services that we provide. We take account of the diversity of the communities we serve in order to ensure that, subject to funding constraints, our services are accessible to all clients.

## Suppliers

We are committed to eliminating unlawful discrimination and to promoting equality and diversity in our professional dealings with suppliers and other third parties. Our Equality and Diversity Policy can be found in our Office Manual.

We build long term partnerships with, and source products from suppliers who share our commitment to CSR and audit them regularly to ensure compliance.

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We endeavour to enter into clear and fair contracts with our suppliers. We commit to the timely settlement of suppliers' invoices.

Wherever possible, we aim to support the local economy by contracting with local suppliers.

#### Environment

We are committed to behaving responsibly and to minimising our impact on the environment. We aim to minimise our impact on the environment by:

- Minimising waste and adopting sensible recycling policies; we currently recycle over 80% of our waste products
- Promoting the company's ISO14001 system which covers all areas of environmental commitment
- Providing safe and comfortable working conditions
- Encouraging staff to walk or cycle to work
- Ensuring that electrical equipment and lights are off when not in use
- Ensuring that heating is turned off or down outside office hours

# Responsibility

Responsibility for this policy, including an annual review of the policy to:

- Ensure that it remains up to date, compliant and relevant to the needs of the organisation and its clients
- Verify it is in effective operation across the practice.

# HUMAN RIGHTS AND ETHICAL POLICY

Young persons under the age of 16 shall not be employed and young persons under 18 shall not be employed at night or in hazardous conditions.

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

## **Collective Bargaining**

Workers without distinction have the right to join or form trade unions of their own and their organisational activities.

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

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

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 of bargaining.

## Working Conditions

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.

Workers shall receive regular and record health and safety training and such training shall be repeated for new or re-assigned workers.

Access to clean toilet facilities, and to portable water and the provision of sanitary facilities and food storage areas.

The company shall assign responsibility for health and safety to a senior management representative.

### Working Hours

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Working hours comply with national laws and benchmark industry standards, whichever afford the greater protection.

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 unless on agreement, shall not be demanded on a regular basis and shall always be compensated.

## Discriminated

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

#### Summary

The company has in place ISO certified quality, security and environmental management systems. The Company also have Fast Forward ethical certification. These externally audited systems are monitored on a yearly basis but are maintained continually internally as part of our commitment to these standards and their concepts form a foundation to our daily working ethic.

Nitecrest's unique structure ensures that all levels of the organisation from shop floor, across management and company directors are included in, and are actively working towards maintaining and promoting our CSR. Our CSR is discussed as part of the company's management meeting held every 6 months. This meeting encompasses all relevant managers and directors from each of the business so that key topics and plans can be actioned efficiently as needed.

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