

## CORPORATE SOCIAL RESPONSIBILITY POLICY

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### CSR POLICY STATEMENT

TEi defines Corporate Social Responsibility (CSR) as actions, which positively impacts on our, customers, shareholders, people, suppliers and the communities around our business above and beyond our legal or regulatory obligations. Examples of our commitment to corporate responsibility include:

- Investing for the long term future of the company to bring out the best in our people
- Managing our environmental impacts to minimise the organisations effect on the environment
- Maintaining effective safety, health, environmental and quality management systems
- Investing in our local communities

TEi recognises Corporate Social Responsibility (CSR) as being a form of corporate self-regulation, which is integrated into our business model and management system (IMS).

While our aim is to maintain a profitable and sustainable business model thus securing the long-term future of the company and its employees, positive public engagement & relations coupled with high ethical standards serve to reduce business and legal risk by taking responsibility for our corporate actions.

Our CSR strategy is designed to make a positive impact on the environment and stakeholders including customers, employees, investors, communities, suppliers and others.

### WHO IS COVERED BY THE POLICY?

This policy covers all individuals working for TEi or at any of our premises irrespective of their status, level or grade. It therefore includes all employees, managers, directors, officers, consultants, contractors, trainees, homeworkers, casual and agency staff (collectively referred to as staff in this policy).

## **INTRODUCTION**

Corporate Social Responsibility represents a commitment by TEi to behave equitably and responsibly. It re-enforces our goals of contributing towards economic development, company longevity and the subsequent security of our employees, while enhancing their quality of life. We acknowledge, recognise and are fully engaged in ensuring that our activities positively contribute to our local community, our operational sites, customers, suppliers, neighbours and to society at large.

It is the aspiration of TEi to capture our existing principles relating to CSR under one framework document. Subsequently, the principles contained within this framework document are designed to cover all areas of our operations and processes.

## **EQUAL OPPORTUNITIES**

TEi wholeheartedly supports the principal of equal opportunities in employment and opposes all forms of unlawful or unfair discrimination on the grounds of sex, race, nationality, ethnic or national origin, marital status, sexual orientation, age or disability.

The Company will take every step to ensure that individuals are treated equally and fairly, and that decisions on recruitment and selection, on training, promotion and career development are taken solely on job based criteria.

The Company believes that it is in their best interests, and those of all who work in the Company, to ensure that the human resources, talents and skills available throughout the community are considered when employment opportunities arise. Discrimination of any kind which prevents the Company from doing so is a misuse and a waste of human resources, and it is also illegal in many instances.

We will put in place any and all reasonable measures and/or adjustments within the workplace for those employees who become disabled during their tenure or for disabled appointees.

TEi provides equal opportunities to all existing and prospective employees recognising that our reputation is dependent on the quality, effectiveness and skill base of our employees. We are committed to the fair and equitable treatment of all our employees and specifically to prohibit discrimination on the grounds of race, religion, sexual orientation, nationality or ethnic origin or disability.

### **AGE DISCRIMINATION**

TEi is committed to ensuring that all staff are treated fairly irrespective of their age and has taken measures to ensure that it fully meets the requirements of the Employment Equality (Age) Regulations 2006 and the Equality Act 2010.

Age will not be a factor in any decisions made concerning recruitment & selection, access to employee benefits, opportunities for promotion or training, performance management, application of discipline or capability procedures or selection for redundancy.

For policy details please see HR11 – Age Discrimination Policy.

### **HUMAN RIGHTS**

TEi supports and respects the protection of internationally proclaimed human rights. Subsequently we support, promote and respect the moral obligations of this principle and work within the legislative requirements of local (Human Rights act 1998) and any salient international human rights legislation or convention. As part of our set of core principles, TEi provides equal opportunities to all existing and prospective employees, customers and stakeholders. We are committed to the fair and equitable treatment of the aforementioned. TEi does not utilise forced labour of any kind. We do not condone, support or utilise child labour of any kind. We adhere to the salient in-Country laws governing labour standards and the convention of human rights.

## **WORKPLACE**

The Health & Safety of our employees is paramount. Our number one core principle is “Nobody Gets Hurt”. We make the appropriate investment in equipment and training to ensure that accidents and injuries are avoided. We provide a safe working environment. All work locations (offices, laboratories, workshops & sites) are required to comply with the appropriate health & safety procedures contained within our Integrated Management System (IMS).

TEi recognises the value of our employees. We seek to attract, employ and retain high-caliber employees and to enhance the work/life balance of the individual. Employee long-term retention forms a key part of the company’s goals and objectives. We offer a range of benefits including a pension scheme, maternity & paternity leave and a generous holiday entitlement, including enhanced entitlement based on longevity of service scheme.

Communication with our employees is a priority and we actively seek opportunities to engage with our staff. We welcome feedback from our employees and listen carefully to suggestions.

TEi recognises the right of collective bargaining. Our site employees are typically engaged and remunerated under the National Joint Council (NJC) for the Engineering Construction framework agreement. This is sometimes referred to as the ‘Blue Book’, or NAECI agreement. The NJC’s objectivity, authority and independence fosters cohesive working relationships. For further details see HR4 Industrial Relations Policy.

All employees of TEi are entitled to work in an environment which respects their personal dignity. The working environment shall be free from bullying, harassment and any other forms of intimidation. TEi has a detailed grievance procedure which provides a mechanism for resolving issues in an equitable manner. Details of the grievance procedure are available to all employees – see HR16 Staff Information Pack.

## **COMMUNITY**

TEi acknowledges that our activities may have a direct impact on social, economic or environmental aspects. We understand our responsibilities we have within the communities in which we operate and are subsequently committed to develop a positive role wherever we can. We are actively involved in local community and academic sponsorships and work with local schools and colleges.

TEi regularly contributes to the communities in which we operate, particularly those neighbouring our sites, through the support of community initiatives and/or local charities. Some safety initiatives directly benefit local charities by their successful outcomes.

## **CUSTOMERS**

We recognise that our business and livelihood depends upon our customers and each and every TEi employee is responsible for ensuring that customer contact is professional and appropriate.

Customer satisfaction is integrated into our business processes and actively reviewed at Senior Management and Board level.

We work closely with our customers to help deliver a product that meets stringent statutory and legislative requirements and exceeds customer expectations.

## **ENVIRONMENT**

TEi is an environmentally conscious organisation. It is our aim to minimise the impact of our operations. We recognise the importance of protecting our environment and minimising the effect of our operations to our employees, customers, neighbours and any other stakeholders.

TEi are aware of the effects that motor vehicle emissions have on the environment and by reducing distances travelled, TEi can help the environment and the health of our staff and the general public.

Our company policy is to purchase and operate efficient commercial vehicles with the aim of achieving a 'greener' fleet.

TEi employs recycling & re-use techniques of existing materials where possible in order to minimise waste.

We actively promote the development of emissions reduction technologies within our designs wherever practical, in order to contribute to the reduction of climate change. TEi is committed to energy reduction in all of its activities wherever practical.

We encourage environmentally acceptable principles & practices, sourcing methods & manufacturing techniques from our supply chain & delivery processes.

## **ETHICS & TEI BEHAVIOURS**

### ***ANTI-BRIBERY AND ANTI-CORRUPTION***

It is the Company's Policy to comply with all laws, rules and regulations governing bribery and corruption law everywhere we operate. The Company has a zero tolerance approach to acts of bribery and corruption, by employees or anyone acting on its behalf. Any breach of Policy will be regarded as a serious matter by the Company which may result in disciplinary action and possibly criminal proceedings.

The Company, its' employees and contractors must never seek, accept or give a bribe, facilitation payment, kickback or any other improper payment and must ensure that they operate with appropriate transparency in all business dealings.

Our employees shall reject any involvement in unlawful, unethical or fraudulent behavior and should report any suggested or implied arrangements. Any employee who reports such alleged conduct will be afforded the appropriate confidentiality & protection as prescribed in the Public Interest Disclosure Act 1998.

For policy details please see HR24 – Anti-Corruption and Anti-Bribery Policy.

### ***ANTI-BULLYING AND ANTI-HARRASSMENT***

At TEi we want to ensure that all staff are treated and treat others with dignity and respect, free from harassment and bullying. All staff should take the time to ensure they understand what types of behaviour are unacceptable under the Anti-Harassment and Anti-Bullying policy.

Workplace harassment or bullying can occur both in and out of the workplace, such as on business trips or at events or work-related social functions. The TEi policy covers bullying and harassment by staff and also by third parties such as customers, suppliers or visitors to our premises.

Staff must treat colleagues and others with dignity and respect, and should always consider whether their words or conduct could be offensive. Even unintentional harassment or bullying is unacceptable.

We will take allegations of harassment or bullying seriously and address them promptly and confidentially where possible. Harassment or bullying by an employee will be treated as misconduct under our Disciplinary Procedure. In some cases it may amount to gross misconduct leading to summary dismissal.

For policy details please see HR19 – Anti-Harassment and Anti-Bullying Policy.

### ***ALCOHOL AND DRUG ABUSE***

The company policy is to ensure that the possible consequences of alcohol or drug abuse on the individual, other employees, public and the environment are reduced to a minimum. The Drug and Alcohol Policy applies to everyone in the organisation and as such indicates the company concern for health, safety and wellbeing of its employees and is complementary to the Employer's Duty of Care under Section 2 of the Health and Safety at Work etc. Act 1974.

Similarly Section 7 of the same Act requires employees to take reasonable care of the health and safety of themselves and others who may be affected by their acts or omissions. Alcohol or drug abuse will lead to health problems and impair judgement and performance at work.

Due to the varied nature of our work activities within a factory environment and construction activities on other occupiers' premises it is not permissible for any employee or sub-contractor's employee under the company's control to be under the influence of alcohol or drugs while at work.

Therefore every employee shall not:

- Perform any work or attend a site while under the influence of alcohol or any controlled substance
- Misuse legitimate drugs or possess, use, distribute or sell illicit or unprescribed controlled substances on company business or contracting site premises
- Consume, possess, use, distribute or sell alcoholic beverages on any company premises or contracting site premises.

Any person found in breach of the policy will be subject to the established Company Disciplinary and Appeal Procedures. For further policy details see HR12 – Substance Abuse Policy.

### **MODERN SLAVERY ACT**

TEi acknowledges and recognises the implementation of the “Modern Slavery Act – 2015”. Subsequently, we will ensure compliance within our organisation and will endeavour to ensure the transparency of goods & services supplied to our company are sourced via an ethical supply chain. TEi undertakes due diligence and screening of our supply chain and maintains an approved vendor list.

For policy details see HR10 – Modern Slavery Act.

### **WHISTLEBLOWING**

Staff should disclose any instances of behaviours that contravene this policy of which they become aware to their line manager.

Everyone involved in the operation of the policy, whether making a complaint or involved in any investigation, is responsible for observing the high level of confidentiality that is required. Details of the investigation and the names of the person making the complaint and the person accused must only be disclosed on a “need to know” basis.

Information about a complaint by or about an employee may be placed on the employee's personnel file, along with a record of the outcome and of any notes or other documents compiled during the process. Breach of confidentiality may give rise to disciplinary action under our Disciplinary Procedure – HR16 Staff Information Pack.

No Staff member will suffer any detriment as a result of raising genuine concerns around contravention of this policy, even if they turn out to be mistaken.

Ideally Staff will feel able to make a disclosure within the TEi organisation. For Staff who feel unable to raise an issue internally, another option is to externally disclose information to a prescribed person. Prescribed persons are mainly regulators and professional bodies but include other persons and bodies such as MPs. The relevant prescribed person depends on the subject matter of the disclosure, for example a disclosure about wrongdoing in a care home could be made to the Care Quality Commission.

A complete list of prescribed persons can be found here:

<https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies>

## **WHO IS RESPONSIBLE FOR THIS POLICY?**

Our board of directors (the board) has overall responsibility for the effective operation of this policy but has delegated day-to-day responsibility for overseeing its implementation to the Managing Director.

All managers have a specific responsibility to operate within the boundaries of this policy, ensure that all staff understands the standards of behaviour expected of them and to take action when behaviour falls below its requirements. Managers will be given training in order that they may do so.

Questions about this policy and requests for training or information regarding this policy should be directed to your line manager in the first instance.

## **MONITORING AND REVIEW OF THE POLICY**

This policy will be reviewed to ensure compliance with legislation in force from time to time by the Board.

Following a formal investigation under this policy, the Director and investigator involved should consider whether this policy has been effective in addressing the issues and report any problems or suggestions for improvement to the board.