

Corporate Social Responsibility

Company Policy





G&E Projects Ltd seeks to be a good corporate citizen in everything that it does

We have therefore 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 of corporate 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 and the UN Convention against Corruption.

G&E Projects directors supports the principles set out in those codes and standards and the aim of this policy is to translate that support into a set of guidelines and standards that set a common approach for G&E Projects 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 directors of G&E Projects. 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, senior management, or other mechanisms established by G&E Projects to report such breaches. We recognise that employees may be reluctant to report concerns for fear of 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.

The Directors of G&E Projects will not criticise management for any loss of business resulting from adherence to the principles set out in this policy. All sections of this policy are underpinned by the G&E Projects Code of Business Ethics, which is set out in Section 1. The other areas covered by this policy are Safety and Security (Section 2), Employment (Section 3), Customer and Community (Section 4) and Environment (Section 5).

SECTION 1 CODE OF BUSINESS ETHICS

This code applies to all the operations of G&E Projects and sets out the minimum standards which the Directors of G&E Projects expects from staff in their internal and external dealings with colleagues, clients and third parties.

Basic Standards of Conduct

- 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.
- We will respect the legitimate interests of third parties with whom we have dealings during our business.
- 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.



Employees

Each G&E Projects employee is committed to creating and maintaining a safe and healthy working environment for its employees.

G&E Projects Ltd. will:

- will strive to create a workplace in which there is mutual trust and respect, and where every person feels responsible for the performance and reputation of our company.
- will respect the individual and each other's rights, customs and traditions including the right to freedom of association and the right to decide whether to join a trade union, and will negotiate in good faith with the properly elected representatives of its employees.
- will work towards achieving a diverse workforce, recruiting, employing, and promoting employees only on the basis of objective criteria and the qualifications and abilities needed for the job to be performed.
- will maintain good communications with employees through our information and consultation procedures.

will assist employees in realising their potential.

Customers

G&E Projects is committed to providing safe, value for money, high quality, consistent, accessible, and reliable services to its clients.

Shareholders

G&E Projects will conduct its operations in accordance with the principles of good corporate governance. We will provide timely, regular, and reliable information on the business to all our shareholders.

Business Partners

We aim to develop strong relationships with our suppliers and others with whom we have dealings, based on mutual trust, understanding and respect.

In those dealings, we expect our partners to adhere to business principles consistent with our own. G&E Projects will conduct their operations in accordance with the principles of fair competition and applicable regulations.

Compliance with Law

All members of G&E Projects will comply with the laws and regulations applicable wherever they do business. Appropriate training will be provided for employees as necessary.

Business Integrity

No G&E Projects employee shall offer, give, seek, or receive, either directly or indirectly, inducements or other improper advantages for business or financial gain and no employee may offer, give, seek or receive any gift or payment which is, or could be construed as such. If an employee is in any doubt as to whether he or she may accept an offer, that employee should discuss the issue with his or her manager or director.

G&E Projects accounting and other records and supporting documents must accurately describe and reflect the nature of the underlying transactions. No undisclosed or unrecorded account, fund or asset will be established or maintained. G&E Projects will not facilitate, support, tolerate or condone any form of money laundering.



The Environment

G&E Projects is committed to making continuous improvement in the management of its environmental impact. We will work with our partners to promote environmental care, increase understanding of environmental issues and disseminate good practice.

Community Involvement

G&E Projects strives to be a good corporate citizen and to fulfil our responsibilities to the societies and communities in which we operate.

Conflicts of interest and confidentiality

Whilst G&E Projects respects the privacy of its employees, all G&E Projects employees are expected to avoid personal activities and financial interests, which could conflict with their responsibilities to the company. G&E Projects employees and consultants must not seek gain for themselves or others through misuse of their positions or company property.

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. Information received by anyone during his or her employment must not be used for personal gain or for any purpose other than that for which it was given. Where information is confidential, that confidentiality must be respected

SECTION 2

SAFETY & SECURITY

Safety

The health and safety of our employees and clients is our paramount concern. Safety underpins all our operations, and our central motto is "If you cannot do it safely, don't do it". We have developed the following high-level health and safety policy, which underpins all of our operational health and safety policies:

General Statement

The Directors of G&E Projects are committed to ensuring, so far as is reasonably practicable, the health, safety and welfare of all of its employees at work and also the safety of clients and others.

This policy seeks continuous improvement and compliance with legislation, having proper regard to the protection of people, premises, property, and the environment. It is based on the principles that:

- All injuries can be prevented
- The goal is zero injuries
- Safety is the responsibility of all employees
- Working safely is a condition of employment

The Managing Director and Directors are tasked to ensure that so far as is reasonably practicable:

- There are adequate arrangements and organisation for health and safety in place within their area of responsibility
- Responsibilities for carrying out these arrangements are clearly allocated
- All staff are given appropriate information, instruction, and training
- Adequate supervision is provided to ensure compliance with policies and safe systems of work



- All other legal and statutory duties on health and safety incumbent upon G&E Projects are complied with in all their operations and locations
- Performance targets are set to achieve a step change in safety performance
- Adequate resources are allocated, and competent persons are appointed to support the achievement of the above objectives.
- We will continually monitor the health and safety performance of our operations which will be subjected to periodic safety audits to assess performance.

The nominated directors will:

- Present a monthly report on health and safety to the company.
- Report to the directors all fatal and notifiable injuries to staff or other persons within 24 hours.

The nine key safety principles with which all G&E Projects employees are required to comply are set out below:

- Do not endanger yourself or others. Report any hazardous condition or practice that may cause injury to people property or the environment.
- Obey all rules, signs and instructions. If you do not understand speak to your manager before you start work.
- Keep your work area clean and tidy. Disorder causes accidents, wastes time, energy, and materials.
- Wear protective clothing and equipment as required. Keep it in good condition, wear it correctly and ask for a replacement if it becomes damaged or unfit for use.
- All accidents, incidents and near misses must be reported to your manager. Seek immediate help and first aid (if necessary).
- Do not adjust modify or repair any piece of work equipment unless you are competent and authorised to do so.
- Use only the correct tools and equipment for the job. Check that they are in good condition before use and use them safely.
- Before lifting, assess the load and your capability to move it. Make sure you get help with any heavy or awkward items and follow approved techniques.
- If you have any suggestions to improve safety in your workplace, tell your supervisor or manager. We also require contractors to comply with this policy whilst they are working for G&E Projects.

Security

General Statement

Security is a key issue for our staff and our business. We recognise the range of security issues which can arise and have implemented the following high level security policy. The Directors of G&E Projects is committed to ensuring, so far as is reasonably practicable, the security of our services, our employees at work and our property.

The threats to security are wide ranging, significant and, in the main, driven by external influences. The ability to control risks varies. However, we can address or mitigate all the threats which apply. To be successful in this we need the cooperation and engagement of all our staff.



Security is an area in which we seek continuous development and improvement and compliance with existing and emerging legislation. We will heighten the profile of security to ensure all members of staff understand why they should and how they can play their part. Our efforts will bring greater personal and corporate security and business benefit.

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 property.

We aim to achieve, so far as is reasonably practicable:

- A secure environment for clients using our services
- A secure environment for staff in their work
- Security of our property
- Security of our systems and processes
- We will develop systems to monitor our performance on security within our operations. All operations will be subject to periodic inspection and review.
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- The Managing Director will provide regular reports on group security to the Directors.

G&E Projects 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:

- A security strategy is in place, which underpins our policy, identifies the key strategic security issues for the business and the approach being taken to address these. This is designed to provide a structure, which allows measurement, review, and ongoing refinement.
- The importance of security is emphasised to all staff through regular security briefings. This provides security advice and guidance and contact details for key security personnel. It also ensures our security specialists can be accessed by all our staff when they are needed.
- Staff are actively encouraged to report security concerns. This is specifically designed to give staff the confidence to report their concerns even in circumstances where they may find conventional line management routes difficult.

This approach to security allows us to ensure we have a process to translate our policy into effective implementation within the organisation. It also allows us to formally recognise and demonstrate our commitment to the need for continuous development and improvement in this important aspect of our business.

We also require sub-contractors to comply with this policy whilst they are working for G&E Projects

SECTION 3

EMPLOYMENT

In formulating its employment policies, G&E Projects is guided by the framework established by the Organisation for Economic Co-operation and Development (OECD) in its guidelines. These guidelines encourage companies to foster openness, sustainability and respect for employee rights. Our employment policies cover all employees of G&E Projects.



Equal Opportunities and Diversity Policy

The Directors of G&E Projects are committed to equality of opportunity both in the provision of services to the public and as an employer. This policy sets out G and E Projects commitment to treat equally and with fairness at all times its employees, clients, contractors, and those who come into contact with the company. 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.

The Directors of G&E Projects 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 clients are treated fairly
- They can demonstrate continuous improvement in practices to promote diversity and equal opportunities for all

Legislation and Codes of Practice

We will comply with and exceed where possible, current national and international legislation and relevant codes of practice. We will monitor our compliance with this policy and the requirements of relevant underpinning legislation as appropriate.

Partner Organisations

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

The company will put in place practices and standard operating procedures to ensure the commitments in this policy are applied and implemented throughout the organisation.

Access to Company Premises

We will take all reasonable steps to ensure that our premises are accessible to disabled employees, clients and visitors as required by the Disability Discrimination Act (DDA) in the United Kingdom.

Access to Information

We will seek to ensure that information is made available to our clients and employees in alternative formats as required.



Recruitment

All recruitment will be carried out regarding 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

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

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. Clients who feel they have grounds for complaint may pursue these through our company customer complaints procedures. We will ensure our complaints/feedback procedures can be accessed and used by everyone.

Reporting

We are committed to monitoring and reporting on our actions and achievements in relation to implementing this Diversity policy both internally and externally.

Audit

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

Human Rights

G&E Projects 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.

- 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.
- We will pay a fair wage reflecting local markets and conditions. We will always meet any national minimum wage.
- Working hours shall not be excessive. They shall comply with industry guidelines and national standards where they exist.
- We will not employ illegal child labour, forced or bonded labour, forced overtime or condone illegal child labour.
- Employees have the rights of freedom of association and collective bargaining. We respect the right of our employees to choose whether to join a trade union without influence or interference from management. Furthermore, we support the right of our employees to exercise that right through a secret ballot.
- We will negotiate in good faith with the properly elected representatives of our employees.
- We will abide by the non-discrimination laws in every country where we operate.
- We will not use or condone the use of corporal punishment, mental or physical coercion or verbal abuse. We have disciplinary procedures for any member of staff whose conduct falls below the required standard.



We have formal grievance procedures through which staff can raise personal and work-related issues. All staff will be given reasonable access to bathroom and rest facilities.

Data Protection

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

SECTION 4 CUSTOMER & COMMUNITY

Clients

Our aim is to be the best we can be. By aiming for the top in everything that we do, and helping each other, we can deliver the highest levels of safety and service and give greater client and employee satisfaction. We will share all the success of our Company.

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 – 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.

Suppliers

Ethical Purchasing Policy

We purchase a wide range of goods and services required in the operation of our business and we also rely heavily on several key suppliers for the delivery of our core services. Good working relationships with our suppliers are therefore central to the success of our business. For this reason, we clearly state our purchasing policy as part of ensuring that our business standards are integrated throughout the supply chain.

We are committed to obtaining and retaining competitive goods and services while at the same time ensuring they are from sources which have not jeopardised human rights, safety, or the environment. We aim to develop strong relationships with our suppliers, based on mutual trust, understanding and respect.

More specifically we expect our suppliers to:

- Adhere to business principles consistent with our own.
- Ensure that their products and services are produced and delivered to comply with all legislation relevant to their business.
- Seek to maintain continuous improvement in their supply chain relationship with us.



- Ensure they adopt and implement acceptable safety, environmental, product quality, product stewardship, labour, human rights, social and legal standards in line with our own code and to ensure these issues are acceptably managed within the supply chain for any products supplied to us.

We will seek to work with our key suppliers to:

- Develop long-term meaningful relations to the benefit of both parties.
- Improve the quality, environmental performance and sustainability of goods and services where this can be achieved to the benefit of both parties.

Community

Our relationships with the local communities we serve are therefore very important to us and are an essential part in the growth of our business. When developing our services, we have a role to play in improving services for the community as a whole and not just our individual clients.

In line with our core values, our community strategy incorporates the following elements:

- Offering employment opportunities to all sectors of the community through non-discriminatory policies and promoting opportunities to disadvantaged and vulnerable groups
- Promoting engagement between our staff and the community
- Supporting local community groups and charities
- Improving the environment in and around our operations
- Promoting broader opportunities for workplace learning
- Supporting local initiatives for the development and education of young people in the areas we serve; and in addition, local companies provide support to community based charities and projects in their respective areas including support for employees' efforts in fund raising and for small-scale projects.

SECTION 5 ENVIRONMENT

Environmental Policy

Through our core business activities, we are committed to providing good quality, reliable and cost effective service to all our clients. Our policy is to strive to achieve continual improvement in environmental performance.

We are committed to:

- preventing pollution and reducing the overall impact of our operations on the environment.
- maintaining an internal management structure for the management of environmental issues which includes clearly defined responsibilities for environmental management capable of delivering this policy commitment
- complying with, and where possible exceeding applicable legal and other requirements relating to the organisation
- monitoring our environmental performance and setting objectives and targets for improvement
- providing appropriate training and awareness programmes for our staff.

Signed:



1st November 2022
Colin Houghton
Managing Director
G And E Projects Limited