

CORPORATE & SOCIAL RESPONSIBILITY POLICY

Policy Statement

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, managers, staff and sub-contractors. West Lancashire Group Ltd strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

West Lancashire Group Ltd are fully committed to the principles and practices of Corporate Social Responsibility. These principles and practices are embedded, as appropriate, into our existing policies, systems and processes, for the benefit of staff as well as the wider community. Our objectives and strategies plus associated policies and procedures will continue to build on this in the future.

West Lancashire Group Ltd stated overall objective affirms that in all key aspects we will be the best performing, and most respected, Medium Sized UK Contractor as determined by our Clients, suppliers and employees.

To achieve this objective, we aim to be recognised as an organisation that is transparent and ethical in all its dealings as well as making a positive contribution, by maximising the social value, to the communities in which we operate.

The principles encompassed in this policy cover all areas of the Group's operations and have been developed and continue to be reviewed against and updated by reference to relevant codes of corporate governance, UK and EU Legislation plus relevant international standards including:

- The Global Compact principles derived from the United Nations (UN) Universal Declaration of Human Rights
- The International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work
- The UN Convention against Corruption
- The Ethical Trading Initiative 'Base Code'

We ensure that employment is chosen freely, freedom of association is respected, working conditions are safe and hygienic, child labour is not used, wages are not lower than the minimum wage, working hours are not excessive, no discrimination is practised, regular employment is provided and no harsh or inhumane treatment is allowed.

Guiding Principles

West Lancashire Group Ltd is an owner-managed business, our guiding principles, based on our retained and practiced family values recognise that we must integrate our business values and operations to meet the expectations of our own, and our Clients, stakeholders. They include customers, employees, suppliers, the community and the environment. We:

- Recognise that our social, economic and environmental responsibilities to these stakeholders are integral to business. We aim to demonstrate these responsibilities through our actions and within our corporate policies
- Take seriously all feedback, compliments and complaints, that we receive from our stakeholders
- Will, in our continual commitment to sustainable development, be open and honest in communicating our policies, strategies, targets, performance and governance to our stakeholders
- Will, where practical and reasonable, make the necessary resources available to realise our corporate responsibilities. The responsibility for delivery lies with all employees.

We are committed to the following core values in all aspects of our work, including the fulfilment of our social responsibility:

Health and Safety, Wellbeing and Welfare

- Maintain high safety performance as our principal underlying core value, delivering the highest standards of Health and safety for our people, and all those affected by our operations, shall consistently remain as our top priority.
- Maintain and enhance our Behavioural Safety Programme “All Ways Safely”, investing significantly, and consistently, in the training, coaching and development of all employees to embed and implement the programme at every level of our organisation.
- Focus our efforts on identifying the health and safety risks inherent in our activities and applying the principles of prevention to eliminate, mitigate and reduce all risks to the lowest practical level.
- Work hard to improve the occupational health and wellbeing of our workforce as vital part of our Health and Safety programme.
- Achieve continual improvement in all aspects of Health, Safety, Welfare, Occupational Health and Wellbeing through continual monitoring and review of our performance using defined and agreed Key Performance Indicators.

Environment / Sustainability

- Continue to assess the potential impact to our business from evolving climate change policies as part of our on-going risk management processes.
- Respect the environment and undertake our works with the utmost environmental awareness and protection, seeking always to protect and enhance biodiversity.
- Comply with, and where possible exceed, applicable legal and other requirements.
- Further develop our environmental management skills, delivering practices that minimise waste and maximise efficiencies.
- Actively promote improved energy and fuel efficiency within our business, taking all reasonable and practical steps to reduce CO2 emissions related to our activities.
- Show exemplary environmental standards in all our operations embracing sustainability by maximising the use of recycled materials.
- Take all reasonable steps to reduce water consumption and any reliance upon potable supplies in all of our operations.
- Achieve continual improvement in all aspects of Environmental / Sustainability performance through continual monitoring and review of our performance using defined and agreed Key Performance Indicators.

Customers

- We shall uphold the values of honesty, partnership and fairness in our relationships with customers.
- We will take all necessary steps to avoid all forms of fraud and corruption.
- We shall treat stakeholders and other interested parties as we would want to be treated ourselves.
- We will record and resolve customer complaints in accordance with our published standards of service.

Community

- We will work with our Clients to maximise the Socioeconomic benefits and the Social Value that can be realised from the projects we deliver by monitoring our progress against agreed targets for local recruitment, training, the engagement of local companies and maximising the value of locally procured goods and services.
- We will take all reasonable and practical steps to minimise disruption to communities and stakeholders affected by our works.
- In selecting either, a charity or community programme to support, West Lancashire Group will only support

programmes that are inclusive in nature and reach across all social and community backgrounds.

- We shall respond promptly to complaints and enquiries from interested parties and the public and provide relevant information regarding our activities.

Supply Chain

- Continue to enhance our supply chain selection, strategy, communication and relationships ensuring we support and enable our supply chain to perform to their abilities in delivering our requirements.
- Behave legally, honourably and ethically always.
- Trade and compete fairly, within a framework of applicable competition law.
- Seek to be fair and honest in our relationships with suppliers and subcontractors.
- Employ the principles of the “Fair Payment Policy” and pay in accordance with contractual terms.
- Take all reasonable and practical steps to ensure that the goods are procured from reputable organisations and manufactured ethically in accordance with local pay and conditions.
- 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 and be transparent in their own procurement practices
 - Seek to maintain continuous improvement in their supply chain relationship with us
 - Adopt and implement acceptable safety, environmental, product quality, product stewardship, labour, human rights, anti-slavery and human trafficking, social and legal standards in line with our own Policies and Procedures.

Governance and People

- We shall, through clear direction and strong leadership, ensure a high level of business performance while minimising and effectively managing risk.
- Everyone has the right to be treated with dignity and respect, respect for people is embedded in our business we will treat all people as we wish to be treated ourselves.
- We shall operate an equal opportunities policy for all present and potential future employees, valuing and harnessing the benefits of equality, diversity and inclusion.
- We will adopt fair and inclusive practices throughout our operations and will adopt a zero-tolerance approach to all prejudice, discrimination, bullying and harassment.
- We will offer our employees clear, fair terms of employment, and provide resources to enable their continued development.
- We will provide and maintain a range of open channels for effective two-way communication / consultation with our employees.
- We will address the needs and aspirations of staff through the continuing development of diversity, work-life balance, occupational health and wellbeing policies and initiatives.
- We shall provide safeguards to ensure that all employees are treated with respect and without harassment.

Compliance, Monitoring and Reporting

Compliance with this policy will be continuously monitored and subject to review by the West Lancashire Group’s Board of Directors.

All of our Directors and Senior Managers are 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.

CSR activity undertaken by West Lancashire Group’s Staff will be reported to the Management Board on a regular basis. Directors and Senior Managers will maintain a framework of current and future CSR programmes that are

run within their business areas and report on these to the Board.

West Lancashire Group's Corporate Social Responsibility Policy will be successfully implemented with the support of all employees through the following corporate policies and procedures:

- Health & Safety Policy
- Environmental Policy
- Quality Policy
- Energy Management Policy
- Anti-Bribery and Corruption Policy
- Anti-Slavery and Human Trafficking Policy
- Sustainable Development Policy
- Whistleblowing Policy
- HR Policies and Procedures
- Occupational Health, Welfare and Wellbeing

Our performance against these policies and the commitments therein will be monitored, measured and reviewed against the policy statement on an annual basis by the Directors and Senior Managers.

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 West Lancashire Groups to report such breaches e.g. our Whistleblowing Policy. The Whistleblowing Policy recognises that employees may be reluctant to report concerns for fear of retaliation. West Lancashire Group 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.

Signed:



Mr. K. O'Toole (Managing Director)

7th March 2019