



## CORPORATE & SOCIAL RESPONSIBILITY POLICY

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## Qdos 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 Rio Declaration on Environment and Development and the UN Convention against Corruption.

Qdos 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 Qdos 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 Qdos, supported by their external consultants. Compliance will be reported at Management Review annually. The Managing Director 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 the Company 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 Qdos 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 Company's 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 of the operations of Qdos and its subsidiaries and sets out the minimum standards which the Directors of Qdos expects from staff in their internal and external dealings with colleagues, customers, contractors and third parties.

### 1.1 Basic Standards of Conduct

1. 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.
2. We will respect the legitimate interests of third parties with whom we have dealings in the course of our business.

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3. 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

Qdos:

1. is committed to creating and maintaining a safe and healthy working environment for its employees.
2. 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.
3. 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 or not to join a trade union and will negotiate in good faith with the properly elected representatives of its employees.
4. 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.
5. will maintain good communications with employees through our information and consultation procedures.
6. will assist employees in realising their potential.

## 1.3 Customers

1. Qdos is committed to providing safe, value for money, high quality, consistent, accessible and reliable services to its customers.

## 1.4 Shareholders

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

## 1.5 Compliance with Law

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

## 1.6 Business Integrity

1. No Qdos company 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 the Managing Director

2. Qdos accounting and other records and supporting documents must accurately describe and reflect the nature of the underlying transactions.

3. No undisclosed or unrecorded account, fund or asset will be established or maintained.

4. Qdos will not facilitate, support, tolerate or condone any form of money laundering.

### 1.7 The Environment

1. Qdos is committed to making continuous improvement in the management of its environmental impact.

2. We will work with our partners to promote environmental care, increase understanding of environmental issues and disseminate good practice.

### 1.8 Community Involvement

1. Qdos strives to be a good corporate citizen and to fulfil our responsibilities to the societies and communities in which we operate.

### 1.9 Conflicts of interest and confidentiality

1. Whilst Qdos respects the privacy of its employees, all Qdos employees are expected to avoid personal activities and financial interests, which could conflict with their responsibilities to Qdos.

2. Qdos employees and consultants must not seek gain for themselves or others through misuse of their positions or company property.

3. 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.

4. 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.

5. Where information is confidential, that confidentiality must be respected.

## SECTION 2 - SAFETY AND SECURITY

### 2.1 Safety

The health and safety of our employees and customers 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 health and safety policy:

It is the policy of Qdos that activities carried out by the company are in accordance with the requirements of the Health and Safety at Work Act 1974. The company accepts its responsibilities as an Employer towards its employees and any other person who may be affected by the work undertaken by the company. The Company also aims to limit adverse effects on or adjacent to land where its work activities are carried out.

The Company will as far as is reasonably practicable aim to:

- Provide and maintain safe and healthy working environments that are without risk to health, safety and welfare.
- Provide training and instruction to enable employees to perform their work safely and efficiently.
- Consider safety at all stages from quotation stage to completion by setting standards that comply with the relevant statutory requirements relating to health, safety and welfare with regard to the effect on employees, contractors, visitors and the public.
- Make a priority of risk avoidance or reduction to safeguard employees and others from foreseeable hazards connected with work activities, processes and working systems.
- Make available necessary safety devices and protective equipment and supervise their use.
- Ensure that when new substances, plant, equipment, processes or locations are introduced that adequate guidance, instruction, training and supervision are provided for safe methods of work to be developed.
- Train all employees to be aware of their own responsibilities in respect of relevant health and safety matters and ensure they participate in the prevention of accidents and co-operate in the control of occupational and non-occupational disorders and diseases.
- Maintain a continuing interest in health and safety matters applicable to the Company's activities and to co-operate with the appropriate authorities and technical organisations to ensure policies are updated and standards reviewed to reflect best practice.
- Make resources available to carry out all the above and to audit / review the policy on an annual basis or as legislation or working practices change.

Each employee shall recognise personal responsibility for observing the Company's Safety Policy.

All Managers and Supervisors will enforce the policy.

**The nine key safety principles with which all Qdos employees are required to comply are set out below:**

1. Do not endanger yourself or others. Report any hazardous condition or practice that may cause injury to people property or the environment.
2. Obey all rules, signs and instructions. If you do not understand speak to your manager before you start work.
3. Keep your work area clean and tidy. Disorder causes accidents, wastes time, energy and materials.
4. Wear protective clothing and equipment as required.
5. Keep it in good condition, wear it correctly and ask for a replacement if it becomes damaged or unfit for use.
6. All accidents, incidents and near misses must be reported to your manager. Seek immediate help and first aid (if necessary).

7. Do not adjust modify or repair any piece of work equipment unless you are competent and authorised to do so.
8. Use only the correct tools and equipment for the job. Check that they are in good condition before use and use them safely.
9. 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 at our premises.

## 2.2 Security

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.

1. The Directors of Directors of Qdos is committed to ensuring, so far as is reasonably practicable, the security of passengers using our services, our employees at work and our property.

2. The threats to security are wide ranging, significant and, in the main, driven by external influences. The ability to control risks varies.

However, we have the ability to address or mitigate all of the threats which apply. To be successful in this we need the co-operation and engagement of all of our staff and our passengers.

3. 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. We will also work on ways to involve passengers. Our efforts will bring greater personal and corporate security and business benefit.

4. 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, our customers and our property.

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

- A secure environment for customers using our services
- A secure environment for staff in their work
- Security of our property
- Security of our systems and processes

6. We will develop systems to monitor our performance on security within our operations. All operations will be subject to periodic inspection and review.

7. The Managing Director will provide regular reports on security.

8. Qdos 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.

9. A specialist SHEQ Team has been developed which operates across all of our United Kingdom sites.

10. The importance of security is emphasised to all staff through regular security toolbox talks and updates. This provides security advice and guidance and contact details for the SHEQ Team. It also ensures our SHEQ Team can be accessed by all our staff when they are needed.

11. Staff are actively encouraged to report security concerns.

12. 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 contractors to comply with this policy whilst they are working at our premises.

### **SECTION 3 - EMPLOYMENT**

In formulating its employment policies, Qdos is guided by the Employment Equality Framework Directive. These Guidelines encourage companies to foster openness, sustainability and respect for employee rights. Our employment policies cover all employees of Qdos and its subsidiaries.

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

1. Qdos is committed to equality of opportunity both in the provision of services to the public and as an employer. This policy sets out Qdos' commitment to treat equally and with fairness at all times its employees, customers, contractors and those who come into contact with the company.

2. 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.

3. The Directors of Qdos are required to ensure:

They create a productive and safe working environment, promoting diversity and inclusion in their workforce;

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They develop new practices, as appropriate, to ensure all employees, contractors and customers are treated fairly; and they can demonstrate continuous improvement in practices to promote diversity and equal opportunities for all.

#### Legislation and Codes of Practice

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

#### Partner Organisations

5. 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

6. 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

7. We 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

8. We will seek to ensure that information is made available to our customers and employees in alternative formats if/as required.

#### Recruitment

9. 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

10. 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

11. 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.

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.



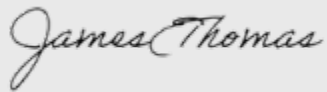
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## Reporting

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

## Audit

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



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modular & portable  
building association