



Ethical Code of Conduct Policy Statement

Camscaff Limited will conduct its business honestly and ethically wherever we operate. We will constantly improve the quality of our services, products and operations and will create a reputation for honesty, fairness, responsibility, integrity, trust and sound business judgement.

Our ethical behaviour will be displayed to our in the following ways:

- **Safety, Health and the Environment** – fundamental to all our operations and impacting on all our stakeholders, we have comprehensive safety, health and environment and sustainability policies and report regularly on performance.
- **Employees** – to attract and retain the services of individuals who are properly and appropriately skilled. We are committed to treating all employees with respect and consideration. We will invest in their development and seek to maintain regular two-way communication to ensure they feel part of our business and are enabled to make a full contribution to our future. We respect human dignity and the rights of individuals.
- **Communities** – we will develop strong relationships within the communities where we work promoting community projects both internally and externally. The projects will reflect the priorities of these communities and sustainability.
- **Customers, Business Partners and Supply Chain** – based on fair, sound ethical practice, our relationships with our customers, suppliers, subcontractors and business partners will enable long-term relationships which are mutually beneficial.

Supporting policies, procedures and monitoring

To guide and support our code of ethical practices and behaviour, the following internal company policies, procedures and processes for monitoring are in place:-

- **Public interest disclosure** – otherwise known as '*whistle blowing*' or '*speaking out*'. This policy provides a confidential and secure means to enable our employees, suppliers, business partners and other stakeholders to raise concerns about conduct which is contrary to our values. We are committed to protecting any employee who reports a breach or suspected breach of the Code of Ethics.
- **Competition Law Compliance** – Camscaff Limited is entirely supportive of open and fair competition and committed to adhering strictly to all competition laws in this regard as well as procurers' published terms of engagement and enquiries. We do not condone any activity which might in any way unfairly restrict the level of competition expected by our customers and procuring authorities.
- **Anti-Bribery and Corruption**- Gifts and Hospitality may be permissible if they are not excessive or hidden. However, we require our employees to inform and have the approval of the line management. They must never be requested. **Bribery** is not tolerated within Camscaff Enterprises Ltd.
- **Confidentiality** – we respect the need to keep certain information confidential to the company and identify information which may not be disclosed, communicated or used upon leaving the company. Retention of confidential information includes customer, prospective customer and in-company information. A clause is included in the contract of employment.



- **Conflicts of interest** – we require our employees to perform their duties honestly and to avoid conflict between any personal financial or commercial interests and their responsibilities to Camscaff Limited. Any potential conflicts of interest must be discussed with the management. A clause to this effect is included in the contract of employment.
- **Equal Opportunities** – we promote equality in the workplace, as stated in this policy and are keen to eliminate all forms of unfair discrimination.
- **Dignity at Work –Disciplinary and Grievance** – statements and processes are in place regarding disciplinary action together with guidance on how grievances should be managed.
- **Drug and Alcohol Policy** – defines the company’s stance on zero tolerance of substance abuse, explains testing routes and those steps which those who may be dependent can take.
- **Email and Internet** – the care which should be taken when working in this medium, the inherent dangers and unacceptable activity defined as abuse are explained in these separate policies.
- **Sustainable Procurement Policy** – we recognise that our activities have an impact upon the environment and the communities in which we work. Our sustainability strategy provides clear direction and leadership for our businesses to deliver a more sustainable approach to the way we work and the solutions we deliver to our customers.

A Behaviour Challenge

At Camscaff Limited we believe that honesty is the best policy. It is an individual’s choice – whether to steal, whether to lie, whether to deceive, but your decision affects the company as a whole.

Challenge yourself with the following questions if you are in any doubt about the action you need to take. Challenge others also if, in your view, they may be likely to, or are, behaving unethically.

- Does it feel right?
- Does it look too good to be true? If so, it probably is. Sound it out with a colleague, manager, director, another department. Test it!
- Does the decision I have taken look ethical? Could it be misconstrued as dishonest or inappropriate?
- Have I all the information I need to make this decision? If not, you may be misinterpreting the situation.
- How would others – the company, senior management, supplier or customer feel if they became aware of my actions?
- Would I want to read about it in the newspaper or hear about it on the local television news?
- Does it, or might it, hurt anyone – physically, emotionally or by reputation?
- Finally, am I complying with the spirit and the intent of the company’s policies and procedures?

Whistle blowing in the public interest

Anyone who has a genuine concern about wrongdoing at work should feel confident that their concerns will be fully investigated and their confidentiality maintained. You can report your concerns to your line manager or director. Alternatively, if you do not wish to do this, you may contact the Managing Director, in full confidence.

This policy will be reviewed annually by the Managing Director.

Stephen Rowan
Managing Director