

**CORPORATE SOCIAL
RESPONSIBILITY POLICY**



DARLOW LLOYD & SONS

Part of the Darlow Lloyd Group Ltd

Darlow Lloyd & Sons 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 Darlow Lloyd & Sons Ltd 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.

The Darlow Lloyd & Sons Ltd Board of 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 Darlow Lloyd & Sons Ltd Company and provide practical guidance for our managers and employees on the ground.

Compliance, monitoring and reporting

Compliance with this policy will be periodically reviewed by the Board of Darlow Lloyd & Sons Ltd Directors.

Each Operations 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 Operations 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 Board of Darlow Lloyd & Sons Ltd 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 Darlow Lloyd & Sons Ltd and sets out the minimum standards which the Board of Darlow Lloyd & Sons Ltd expects from staff in their internal and external dealings with colleagues, customers, stake holders and third parties.

1.1 Basic Standards of Conduct

- (a) 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.
- (b) We will respect the legitimate interests of third parties with whom we have dealings in the course of our business.
- (c) 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

Each Darlow Lloyd & Sons Ltd employee

- (a) Is committed to creating and maintaining a safe and healthy working environment for its employees.
- (b) 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.
- (c) 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.
- (d) 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.
- (e) Will maintain good communications with employees through our information and consultation procedures.
- (f) Will assist employees in realising their potential.

1.3 Customers

- (a) Darlow Lloyd & Sons Ltd is committed to providing safe, value for money, high quality, and consistent, accessible and reliable services to its customers.
- (b) Darlow Lloyd & Sons Ltd will conduct its operations in accordance with the principles of good corporate governance.
- (c) We will provide timely, regular and reliable information on the business to all our customers.

1.4 Business Partners

- (a) We aim to develop strong relationships with our customers, clients, suppliers, and others with whom we have dealings, based on mutual trust, understanding and respect.
- (b) In those dealings, we expect our partners to adhere to business principles consistent with our own.
- (c) Darlow Lloyd & Sons Ltd will conduct their operations in accordance with the principles of fair competition and applicable regulations.

1.5 Compliance with Law

- (a) All employees of Darlow Lloyd & Sons Ltd will comply with the laws and regulations applicable wherever they do business. Appropriate training, supervision and instruction will be provided for employees as necessary.

1.6 Business Integrity

- (a) No Darlow Lloyd & Sons Ltd 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.
- (b) 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 Divisional Manager or Director.
- (c) Darlow Lloyd & Sons Ltd accounting and other records and supporting documents must accurately describe and reflect the nature of the underlying transactions.
- (d) No undisclosed or unrecorded account, fund or asset will be established or maintained.
- (e) Darlow Lloyd & Sons Ltd will not facilitate, support, tolerate or condone any form of money laundering.

1.7 The Environment

- (a) Darlow Lloyd & Sons Ltd is committed to making continuous improvement in the Management of its environmental impact.
- (c) Darlow Lloyd & Sons Ltd will work with our clients, customers to promote environmental care, increase understanding of environmental issues and disseminate good practice.

1.8 Community Involvement

- (a) Darlow Lloyd & Sons Ltd 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

- (a) Whilst Darlow Lloyd & Sons Ltd respects the privacy of its employees, all Darlow Lloyd & Sons Ltd employees are expected to avoid personal activities and financial interests, which could conflict with their responsibilities to Darlow Lloyd & Sons Ltd.
- (b) Darlow Lloyd & Sons Ltd employees and consultants must not seek gain for themselves or others through misuse of their positions or company property.
- (c) 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 Divisional Manager.
- (d) 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.
- (e) Where information is confidential, that confidentiality must be respected.

SECTION 2 SAFETY AND SECURITY

2.0 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 it's not safe 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:

(a) General Statement

The Board of Managing Directors of Darlow Lloyd & Sons Ltd is 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 customers and others.

(b) 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

(c) The Directors of Darlow Lloyd & Sons Ltd 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 employees 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 Darlow Lloyd & Sons Ltd 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 manager will:
- Present a monthly report on health and safety.
- All fatal and notifiable injuries are to be notified within 24 hours to the relevant bodies i.e HSE.

The nine key **safety principles** with which all Darlow Lloyd & Sons Ltd 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 Divisional 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 Divisional 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 Site Supervisor or Divisional Manager.**
Darlow Lloyd and Sons Ltd also require contractors to comply with this policy whilst they are working on Darlow Lloyd and Sons Ltd premises.

SECTION 3

EMPLOYMENT

In formulating its employment policies, Darlow Lloyd & Sons Ltd is guided by the framework established by the Organisation for Economic Co-operation and Development (OECD) in its Guidelines for Multinational Enterprises. These Guidelines encourage companies to foster openness, sustainability and respect for employee rights. Our employment policies cover all employees of Darlow Lloyd & Sons Ltd.

3.1 Equal Opportunities and Diversity Policy

(a) The Board of Directors of Darlow Lloyd & Sons Ltd is committed to equality of opportunity both in the provision of services to the public and as an employer. This policy sets out Darlow Lloyd & Sons Ltd's commitment to treat equally and with fairness at all times its employees, customers, contractors, clients and those who come into contact with the company.

(b) 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.

(c) The Board of Directors of Darlow Lloyd & Sons Ltd 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 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

(d) Darlow Lloyd and Sons Ltd will comply with and exceed where possible, current national and international legislation and relevant codes of practice in the countries where we operate.

Other Organisations

(e) We are committed to actively working with other organisations to ensure our policies, procedures and practices are in line with best practice. In accordance with our accreditations with CHAS and ISO 9001, 14001, 45001.

(f) Each division and operating 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 Information

(g) Darlow Lloyd and Sons Ltd will seek to ensure that information is made available to our customers and employees in alternative formats as required.

Recruitment

(h) 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.

Employee Training

(i) Darlow Lloyd and Sons Ltd will provide our employees 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

j) 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 and clients who feel they have grounds for complaint may pursue these through our operating company complaints procedures. We will ensure our complaints / feedback procedures can be used by everyone.

Audit

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

3.2 Human Rights

Darlow Lloyd & Sons Ltd 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 employees.

a) Darlow Lloyd & Sons Ltd will treat all employees fairly and honestly, regardless of where they work. All employees will have agreed terms and conditions in accordance with local law or practice and will be given appropriate job skills training.

b) Darlow Lloyd & Sons Ltd will pay a fair wage reflecting local markets and conditions. We will always meet any national minimum wage.

c) Working hours shall not be excessive. They shall comply with industry guidelines and national standards where they exist.

d) Darlow Lloyd & Sons Ltd will not employ illegal child labour, forced or bonded labour, forced overtime or condone illegal child labour.

e) Employees have the rights of freedom of association and collective bargaining. Darlow Lloyd & Sons Ltd respect the right of our employees to choose whether or not 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.

f) Darlow Lloyd & Sons Ltd will negotiate in good faith with the properly elected representatives of our employees.

g) Darlow Lloyd & Sons Ltd will abide by the non-discrimination laws in every country where we operate.

h) Darlow Lloyd & Sons Ltd will not use or condone the use of corporal punishment, mental or physical coercion or verbal abuse.

Darlow Lloyd & Sons Ltd have disciplinary procedures for any employees whose conduct falls below the required standard.

i) Darlow Lloyd & Sons Ltd have formal grievance procedures through which employees can raise personal and work-related issues.

j) All employees will be given reasonable access to bathroom and rest facilities.

3.3 Data Protection

(a) Darlow Lloyd & Sons Ltd will comply with the relevant principles governing data protection.

4 Community

Darlow Lloyd and Sons have a responsibility to those living and working nearby as well as being a significant employer.

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 customers.

- Engagement with the local communities in which we operate on the quality of our services and any changes to those services;
- Working with local authorities, businesses and other interested parties to promote sustainable travel to reduce congestion and improve quality of life;
- 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 employees and the community
- 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.

Name: Donna Lloyd

Signature:

A handwritten signature in black ink, appearing to read 'D. Lloyd', written in a cursive style.

Position: Company Secretary

Date:15/01/2024

Review Date 01/01/2024



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