



Corporate Social Responsibility Policy

COLE Group is committed to creating business growth whilst ensuring that impact on the environment is minimized and that well-trained and qualified employees conduct all activities safely.

The following summarizes our policies and procedures.

Overall responsibility for developing corporate policies on social, ethical and environmental matters and for reviewing their effectiveness lies with the COLE Group Board. It is then the responsibility of individual managers to communicate and apply that policy within their particular business area taking account of legislation to ensure compliance with the policy and to maintain, review and refine procedures accordingly.

COLE Group policies and procedures, including those relating to social, environmental, health and safety, employment and ethical matters, are communicated to all staff via the COLE Group Employee Handbook. All policies and procedures are reviewed regularly and any updates are communicated to staff.

The three key areas of corporate social responsibility at COLE Group are:

- Environment
- Health and Safety
- Human rights, employment and ethics

Environment

COLE Group is committed to adopting environmentally responsible policies and our environmental policy statement can be found within our HSE Policy and H&S handbook.

Health and safety

COLE Group recognizes its health and safety duties and responsibilities and complies with the relevant health and safety legislation. The Managing Director has overall responsibility for health and safety.

Human rights, employment and ethics

It is our policy to adhere to all legislation relating to employment rights and equal opportunities, with particular reference to non-discrimination on the basis of ethnic origin, religion, gender, age, marital status, disability or sexual orientation.

We ensure that physical, verbal and psychological abuse, or sexual or other forms of harassment towards employees are not tolerated.



We ensure that disabled persons are recruited, trained and promoted on the basis of aptitude and ability. If employees become disabled, every effort is made to retain them and when necessary re-train them for appropriate posts.

We pay wages and benefits that meet or exceed national minimum requirements and adhere to working time regulations where applicable.

We do not use forced labor nor employ workers under the school-leaving age.

We provide a safe and secure workplace and promote good health and safety and environmental practices.

We adhere to applicable laws regarding the freedom of employees to associate or bargain collectively without fear of discrimination.

All employees are expected to behave with integrity and honesty and adhere to the code of ethics.

Employees may report any concerns they may have over unethical business practices or conduct, dangers to Health and Safety, or breach of company policies. Any such disclosures are appropriately investigated. In addition, COLE Group is committed to protecting the career and reputation of employees who report wrongdoing in accordance with established procedures, as long as their disclosures are delivered in good faith and seek to safeguard the best interests of the company.

We do not give or receive any bribes, extra contractual gratuities, inducements, facilitation fees or similar payments.

We do not give to customers or business contacts, or allow by employees to receive any gifts, whether in cash or kind, unless in the course of normally accepted business entertainment or the subject of prior written approval by management.

We do not donate (including sponsorship, subscriptions or provision of employee time or facilities) to any political party or similar organization.

We ensure we purchase legal licenses to all software in use.

We try to ensure that there are no conflicts of interest between employee's private financial activities and their part in the conduct of COLE Group businesses.

COLE Group recognizes the value that its employees create for the business and its commitment to training and personal development, together with remuneration policies that are designed to reward achievement and emphasize the importance of retaining staff.

COLE Group provides information to employees on a regular basis. This information includes matters relating to company performance, its prospects and the future outlook for business.

Signed:.....


Position: Managing Director.....

Date: 5th April 2019.....