

00-02-17

## Human Resource Management System

### Corporate Responsibility & Sustainability Policy

Name	Position	Signature	Date
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## 2. Introduction

The services provided by LOFT touch the lives of thousands of people throughout the UK and involve the business working closely with local communities and their environment. This drives our Corporate Responsibility (CR) activities in which we seek to maximise the positive impact on the communities we serve and the environments in which we operate. Our CR approach is based around four key impact areas

- Business Integrity
- The Environment
- Our People
- Our Communities

## 3. CR Policy Statement

All of LOFT share the vision to be the leader in delivering to our valued customers technologically proven and cost certain solutions.

Working in strategic partnership with our customers, we strive to provide

- Cost and delivery certainty
- Accountability both as individuals and as a team on delivering our commitments
- Innovation and value led solutions
- Professionalism, and an ease of doing business with.

Our Directors, Management and colleagues uphold the values of

- Making a positive difference in our customers' success
- Making LOFT a great place to work, through success and personal development
- Always doing the right thing, even in difficult circumstances

LOFT acknowledges that a company will be judged not solely on its financial performance, but increasingly on its wider impact and role within society. Sustainability is therefore a central principle of LOFT. To ensure we have the smallest possible impact on the environment whilst benefiting our clients, staff and local community LOFT endeavour to:

- Manage our environmental impacts by monitoring and using natural resources efficiently, sourcing responsibly and reducing waste
- When tendering for contractors and consultants, seek organisations with Environmental Management Systems in place.
- Incorporate biodiversity considerations, mitigating and enhancing where appropriate, in project plans from inception
- Provide appropriate training for staff to enable them to operate sustainably.
- Provide adequate facilities to support sustainable travel for building users.
- Invest in people to provide them with the skills to thrive in an adapting world
- Support the communities in which we operate and those impacted upon by our activities
- Ensure the health and safety of all those who work for us, and those that can be affected by our services.
- Run an ethical business

LOFT consider strong governance, stakeholder engagement and transparency essential elements of sustainability and as such the Directors will set key objectives based around these policy principles within the Company's Sustainability Plan with quantifiable delivery targets supported by focussed programmes to deliver them. In addition, the Directors will

- Review this policy annually and ensure it is made available to all staff
- Identify and engage with our stakeholders to seek feedback on our Sustainability Plan
- Publish the Company's Sustainability Plan via both the LOFT Internet and Intranet systems so it is available to all
- Communicate and annually report on our sustainability performance

Ben Hall, Managing Director

## 4. Policy

### 4.1. Business Integrity

#### a. Fraud, Bribery & Corruption

LOFT takes extremely seriously the effective prevention and detection of fraud, bribery and corruption and any other fraudulent or corrupt activity. It will not tolerate them in any form. The Board is fully committed to promoting a zero tolerance approach across the group. As well as being illegal, fraud, bribery, corruption and any other fraudulent or corrupt activity are damaging to all parties who engage in them.

We will not offer, give or receive bribes or improper inducements for any purpose whether directly or via a third party. We expect all staff to act honestly and with integrity to safeguard LOFT and our customers' assets, including information, goodwill, property and equipment. We each have a responsibility for fraud prevention, detection and reporting and the Board encourages anyone with reasonable suspicions of fraud or corruption to report them. No employee will suffer as a result of reporting reasonable suspicions.

#### b. Conflict of Interest

All LOFT people must disclose or seek direction on any issues that could potentially conflict with their responsibilities to the company. LOFT people should not, directly or indirectly, engage in, or have any interest, financial or otherwise, in any other business enterprise which interferes or is likely to interfere with their independent exercise of judgement in LOFT best interest.

Generally a conflict of interests exists when an employee is involved in an activity which

- provides products or services directly to, or purchase products or services from LOFT.
- subjects the employee to unreasonable time demands that prevent the employee from devoting proper attention to his or her responsibilities to LOFT
- is so operated that the employee's involvement with the outside business activity will reflect adversely on LOFT.

#### c. Disclosure & Whistleblowing

All LOFT people have a responsibility to protect LOFT assets, including information and goodwill as well as property. LOFT encourages its people to raise genuine concerns about malpractice at the earliest possible stage and in the right way. Concerns will be treated seriously and investigated appropriately; where possible you will be kept up to date with progress.

Any employee who has a concern about malpractice should use the option below he/she feels most comfortable with to raise concerns:

- Line Manager;
- Head of HR;
- Company Director.

#### d. Supplier Engagement

The implementation of a supplier engagement strategy supports the delivery of improved quality and reduced costs. In addition, it reduces risk of supplier failure, cost aversion, or quality shortfall. In today's global business environment, success depends more than ever on our supplier relationships. It is therefore LOFT policy to develop collaborative partnerships in which our suppliers help us achieve our business objectives.

LOFT will

- Strategically select efficient and sustainable suppliers
- Explore collaboration opportunities where benefits can be shared
- Share knowledge to maximise the development of closer relationship and associated mutual benefits
- Identify opportunities to increase supplier engagement year on year

We will engage with our supply chain partners through the following activities:

- provision of LOFT policies
- requests for information on partner's operations via a standard questionnaire containing questions relating to key sustainability issues.
- discussions and regular communications
- partner forums, information sessions and workshops as appropriate.

#### **e. Ethical Procurement**

Sustainability is paramount in our business and supply chain and our commitment to sustainable procurement is reflected in our dealings with our supply chain partners. We must ensure that we maintain our ethical standards and behave respectfully when working with others. The relationships with our suppliers and business partners are based on the principle of fair and honest dealings at all times and in all ways.

We expect our suppliers and business associates to extend the same high standards to all others with whom they do business, including employees, sub-contractors and other third parties specifically we expect our supply chain partners to

- Treat people fairly and with respect, so there is a culture of equality and equity
- Comply with the International Labour Organisation's core conventions as well as local labour laws and regulations
- Understand our safety, sustainability, quality, time and cost management requirements and provide competent people that will continuously deliver to our standards
- Effectively manage and mitigate their environmental impacts
- Continually improve their social and environmental performance
- Commit to and participate in continuous improvement programmes
- Apply these principles fairly and consistently to their supply chain to ensure that key risks are understood and managed

#### Procurement Policy

#### **f. Stakeholder Relations**

We have a range of stakeholders - both externally and internally – and we see all of them as an important part of the LOFT team. In support of this

- We will conduct an annual survey of our employees to monitor employee engagement and identify areas where we can improve
- We will conduct an annual survey of our clients to monitor client satisfaction and identify areas where we can improve
- We will look to engage with Small and Medium Enterprises (SMEs) within all of our contracts, understanding the important role they play within the UK economy and creating sustainable local economies. We will build long-term partnerships with SMEs as they work with us to deliver our commitments to our customers.

### **4.2. Environment**

#### **a. Environmental Management**

We make every effort to be a responsible organisation when it comes to safeguarding natural resources and biodiversity for future generations. We are committed to ensuring sound environmental management practices. It is our intention to effectively manage and improve our environmental performance and minimise the impacts of our business on the environment. We are committed to doing this through driving continual environmental improvement by ensuring effective management of our environmental impacts and implementing environmental management systems in compliance with EN ISO 14001:2004

## **b. Carbon Management**

The implication of carbon emissions upon climate change has been recognised as one of the most serious long term threats on normal everyday life. LOFT are aware of the risks which climate change poses to both our business model and the wider environment. We will continue to improve the accuracy and completeness of our carbon footprint to enable us to reduce carbon intensity of business

Our reduction strategies will involve not only low carbon technologies and products but also encouraging the involvement of employees to adapt their behaviour to reduce emissions related with their daily routines. Active participation of employees is a vital step in reducing emissions as it is their actions that could substantially reduce emissions associated with property and business travel.

## **c. Waste Management**

LOFT are committed to move towards a 'zero waste business'. This doesn't mean that no waste will exist rather it is a policy where resources are fully valued, financially and environmentally. It means we reduce, reuse and recycle all we can, and throw things away only as a last resort. Waste prevention, which is the best option for the environment, is our highest priority, followed by preparing for re-use, recycling, other recovery and disposal.

Hazardous waste is essentially waste that contains hazardous properties which if mismanaged has the potential to cause greater harm to the environment and human health than non-hazardous. We are committed to send zero non-hazardous waste to landfill by 2020. For us, this is not just an environmental imperative, but a valuable efficiency driver in a competitive market.

## **d. Environmental Incidents**

It is our intent to demonstrate an ongoing and determined commitment to improving the environment in which we work and operate. LOFT recognises that the overall aim of any incident reporting process is to seek to adopt a proactive culture, which records and reports all incidents that do occur, in order to learn from mistakes. LOFT believe that all environmental incidents are preventable however should an incident occur, LOFT will ensure a full and thorough investigation takes place. Any lessons learnt from such events will be used to take corrective action to prevent recurrences.

## **4.3. People**

### **a. Human Rights**

We support the belief that human rights are universal and adhere to the principles of human rights in our operations. We support the United Nations Universal Declaration on Human Rights and work hard to ensure that in all areas of interaction with our employees, clients, suppliers and third parties, that everyone is protected and treated absolutely fairly.

### **b. Equality & Diversity**

LOFT will make every effort to ensure that all employees are treated with courtesy, dignity and respect irrespective of race, nationality, colour, ethnic or national origin, age, sex, marital status, sexual orientation, religion, creed or disability.

LOFT aims to be an equal opportunity employer and is determined to ensure that no applicant or employee receives less favourable treatment on the grounds of race, nationality, colour, ethnic or national origin, age, sex, marital status, sexual orientation, religion, creed or disability, or is disadvantaged by conditions or requirements which cannot be shown to be justifiable.

This policy is underpinned by a range of employment policies and procedures designed to ensure fairness and equity when dealing with problems which may affect people at work.

## **c. Training & Development**

LOFT are committed to creating an environment that encourages development for all members of staff. The Company recognises that the development of rounded individuals with a broad range of skills and interests brings both individual and organisational benefits and is, therefore, fully committed to providing opportunities for staff to enable them to reach their full potential.

LOFT recognises the need to invest in the training and development of all its employees in order to deliver the best possible services to its clients. By providing opportunities, facilities and, where appropriate, financial assistance, LOFT aims to ensure that all staff possess the knowledge, skills and behaviours necessary to perform successfully in their current and future roles

## **d. Health, Safety & Wellbeing**

LOFT does not compromise when it comes to the health, safety and wellbeing of our people and those working for and on our behalf. The health and wellbeing of LOFT employees is not simply the right thing to do, it is vital to the long-term success of our business. We have well-established policies and systems in place to manage health and safety.

We will identify desired and undesired behaviours for all our people. Additional desired and undesired behaviours will be identified for supervisors and managers, who will be expected to show leadership in health and safety. We will engage with our workforce on health and safety and act on issues raised.

## **4.4. Communities**

### **a. Education & Employment**

As an employer, having a prepared talent pool of future employees is essential. LOFT is committed to providing opportunities and pathways to employment for the next generation.

- We will focus our community education initiatives on young people within schools and educational establishments local to our offices.
- To further develop employees of the future for all levels and across all disciplines within LOFT, we will seek to offer
  - Apprenticeships
  - New Entrant Programmes
  - Undergraduate Placement Programmes
  - Graduate Development Programmes
- We will look to engage with Small and Medium Enterprises (SMEs) within all of our contracts, understanding the important role they play within the UK economy and creating sustainable local economies. We will provide practical and tailored advice, guidance and support to these organisations in support of their own growth, creating further opportunities for local employment.

### **b. Charitable Involvement**

We believe LOFT can make a positive difference to the development of our local communities. Our policy will be delivered by enabling and actively encouraging our people, our supply chain and stakeholders to participate in charitable activities as part of development programmes, workplace initiatives or individual voluntary work.

## **5. Related Legislation & Standards**

ISO26000 – Social Responsibility (reference only)

Bribery Act 2010 (as amended 2012)

Human Rights Act 1998

Equality Act 2010

Health & Safety at Work etc. Act 1974

ISO 14001 Environmental Management  
The EU Waste Framework Directive

## 6. Related Procedures & Forms

- 00-02-03 Anti-Bribery Policy
- 00-02-12 Modern Slavery Act Statement
- 00-02-13 Anti-Slavery & Human Trafficking Policy
- 00-02-21 Corporate Gift & Hospitality Policy

## 7. Updates

Revision	Date	Updated By	Changes
1	March 2018	Nerys Stead	Document creation