

Social Responsibility Policy

This policy applies to all of the operations of Contraflow and sets out the minimum standards which the Directors expect from staff in their internal and external dealings with colleagues, customers and third parties. This policy will be reviewed annually and emailed to all appropriate staff within the business.

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

Contraflow

- (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.
- (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) Contraflow is committed to providing safe, value for money, high quality, consistent, accessible and reliable services to its customers.

1.4 Shareholders

- (a) Contraflow will conduct its operations in accordance with the principles of good corporate governance.
- (b) We will provide timely, regular and reliable information on the business to all our shareholders.

1.5 Business Partners

- (a) We aim to develop strong relationships with our 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) Contraflow will conduct its operations in accordance with the principles of fair competition and applicable regulations.

1.6 Compliance with Law

- (a) All employees will comply with the laws and regulations applicable wherever they do business. Appropriate training will be provided for employees as necessary.

1.7 Business Integrity and Anti Bribery

- (a) Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest in the circumstances.
- (b) Bribery can be defined as offering, promising or giving a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way which a reasonable person would consider improper in the circumstances. Corruption is any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery.
- (c) Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a decision.
- (d) All employees must note the following
 - (i) No 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. 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.
 - (ii) Business accounting and other records and supporting documents must accurately describe and reflect the nature of the underlying transactions.
 - (iii) No undisclosed or unrecorded account, fund or asset will be established or maintained.
 - (iv) Contraflow will not facilitate, support, tolerate or condone any form of money laundering.
- (e) The firm will investigate thoroughly any actual or suspected breach of this policy, or the spirit of this policy. Employees found to be in breach of this policy may be subject to disciplinary action which may ultimately result in their dismissal.
- (f) This policy is not intended to prohibit what is deemed as either receiving or offering appropriate and proportionate entertainment, so long as this is fully recorded and authorised by their line manager.

1.8 The Environment

- (a) Contraflow is committed to making continuous improvement in the management of its environmental impact.
- (b) We will work with our employees to promote environmental care, increase understanding of environmental issues.

1.9 Community Involvement

- (a) Contraflow strives to be a good corporate citizen and to fulfil our responsibilities to the societies and communities in which we operate.

1.10 Conflicts of interest and confidentiality

- (a) Whilst Contraflow respects the privacy of its employees, all employees are expected to avoid personal activities and financial interests, which could conflict with their responsibilities to Contraflow.
- (b) Contraflow employees 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 line 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.

Signed



Position Managing Director

Date 23rd October 2017