

# Ethics Policy

## INTRODUCTION

This Ethics Policy is supported by the Managing Directors of South West Steel Supplies Ltd, it sets out standards of professionalism and integrity to be maintained by our own business and in our supply chain.

Every employee in South West Steel Supplies Ltd has a right to expect the Company and businesses in our supply chain to maintain proper standards and in turn all employees of the company and those in our supply chain have a duty to maintain these standards through their decisions, actions and communications.

South West Steel Supplies Ltd has a zero tolerance of modern slavery in all its forms, in our own company and in our supply chain. This means not using forced or compulsory labour, & / or labour held under slavery or servitude. South West Steel Supplies Ltd will comply with the Modern Slavery Act 2015 and will seek to work with suppliers to identify and manage areas of risk in our and in their supply chain.

This policy provides guidance on the way all employees of the company and those in businesses in our supply chain are expected to conduct themselves, operating with integrity, fairness and in compliance with the law Modern Slavery Act, the International Labour Organization's core conventions and the UN Global Compact, as well as local labour rules and regulatory requirements.

## POLICY STATEMENT

South West Steel Supplies Ltd expects all its employees, and those of the businesses in our supply chain, to operate with integrity and to high standards of ethical conduct when carrying out their duties on behalf of and for the Company, by;

- Behaving honestly and fairly.
- Complying with all legal and regulatory requirements.
- Promote the awareness of modern slavery and human trafficking .
- Conducting themselves in a manner that will promote the reputation of SWSS Ltd and those of the businesses in our supply chain.
- Treating people with respect.
- Safeguarding the assets and property of SWSS Ltd and those of the businesses in our supply chain.
- Not using their authority or position for personal gain.
- Not recruiting or promoting employees other than on their ability.
- Not taking unfair advantage of others through dishonest, unethical or illegal practices.
- Not knowingly making any false or misleading statements.

- Not misappropriating the assets or property of the company or those of our supply chain businesses.
- Create a transparent supply chain that seeks to improve ethical standards of working.

## **GENERAL**

This policy provides general guidance on business ethics to all employees of the company and those of our supply chain businesses, but should be read in conjunction with other relevant policy statements and the provisions of contracts of employment.

This policy will be enforced and any infringements could result in disciplinary action being taken against a company employee or a supply chain business in accordance with formal procedures. In the most serious cases this may result in dismissal from the Company, a police referral for criminal prosecution and a claim for recovery of loss or damage.

Any person suspected of any infringement of this policy will be given the opportunity to explain their actions before formal disciplinary procedures commence.

## **COMPLIANCE WITH LAWS, RULES AND REGULATIONS**

All company Directors will take all reasonable steps to be aware of the laws and regulatory requirements affecting their areas of operation and where necessary should seek advice from specialists.

The Managing Directors are responsible for ensuring that this policy is communicated with employees and that they are familiar with the contents of it.

## **CONFIDENTIALITY**

All employees must maintain the privacy of non-public confidential information entrusted to them by the Company, its customers or any other party with whom the Company conducts business.

Specific categories of confidential information that should never be disclosed to persons outside the Company, except where disclosure is authorized or legally required would include:-

- 1 Business operating information, business and marketing plans, volume data, pricing policies, contract terms, customer and supplier data as well as personal data under the Data Protection Act.
- 2 Unpublished financial results, sales details, budgets, incentive targets and business initiatives under consideration falling within the normal definition of inside information.

- 3 Confidential information should not be improperly collected, stored or distributed, lost or destroyed.

## **CONFLICTS OF INTEREST**

All employees owe a duty of care to the Company to avoid situations which may give rise to a conflict of interest. A conflict of interest occurs when the private interests or actions of an individual may interfere with the interests of the Company as a whole and make it difficult for an individual to perform his or her work objectively and effectively. All such potential conflicts of interest must be notified to the individual's immediate line manager.

## **REPORTING ANY ILLEGAL OR UNETHICAL BEHAVIOUR.**

An open door approach is encouraged throughout the Company so that, if necessary, any queries and concerns can be brought to the attention of line management.

The Whistleblowing facility provides access to a helpline for any employee who would prefer to report matters on a confidential basis. The confidential helpline is available on (MHR Manager – 07703 582200) The Directors will not tolerate reprisal or bullying of anyone who in good faith reports a serious breach of this or any other Company policy. All employees are expected to co-operate fully in any internal investigation into illegal or unethical behavior.

## **FINANCIAL COMPLIANCE AND FINANCIAL RECORDS**

### **ANTI-CORRUPTION**

Corruption causes loss and damage, inhibits business growth, is harmful to the reputation of the business, and may result in criminal and civil liability and penalties for the Company and employees.

The Company prohibits its employees, from engaging in any form of corruption in relation to its business and affairs.

### **ACCOUNTABILITY AND SUPPORT**

The Directors are accountable and responsible for ensuring compliance with MJP financial and other policies, including this Ethics Policy, and where applicable, ensuring that adequate records are maintained to demonstrate compliance. Support is also provided through:-

- 1 The use of external auditors who audit SWSS Ltd financial statements.
- 2 Internal Audits and controls and/or through the Whistleblowing Policy.
- 3 Financial risk assessment process.

## **SUPPLIER ACCOUNTABILITY**

South West Steel Supplies Ltd expects the businesses in our supply chain to:-

- Comply with all legal and regulatory requirements.
- Support and respect the culture, social, political and legal diversity of all societies and protect internationally proclaimed human rights.
- Uphold the freedom of association and the effective recognition of the right to collective bargaining.
- Declare themselves in favour of prohibiting all kinds of forced, bonded and involuntary prison labour.
- Employ no child labour, in line with minimum age laws within the country you operate.
- Identify the areas of high risk and understand the impact to your supply chain.
- Raise awareness with your employees and your immediate supply chain to understand the risks of Modern Slavery and Human Trafficking.
- Develop a clear process for reporting unethical activity that is communicated throughout your business.
- Conduct frequent due diligence supplier checks for those suppliers deemed high risk.
- Implement an improvement plan to support ongoing commitment towards the ethos of Modern Slavery Act 2015.

This policy has been endorsed by Mr. Mark Derrick, Director with full support of the management, and the workforce.

Signed .....  ..... on behalf of **South West Steel Supplies Ltd**

**Name:** Mark Derrick

**Position:** Director

**Date:** 22/05/2018