

GROUP CORPORATE SOCIAL RESPONSIBILITY POLICY

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Pages in the document – 14

Contents

Amendment Control	3
CORPORATE SOCIAL RESPONSIBILITY POLICY	4
Compliance, monitoring and reporting	4
1. CODE OF BUSINESS ETHICS	5
1.1 Basic Standards of Conduct	5
1.2 Employees.....	5
2. SAFETY AND SECURITY	7
2.1 Safety	7
2.2 General Statement	7
3. EMPLOYMENT.....	9
3.1 Equal Opportunities and Diversity Policy	9
3.2 Human Rights.....	10
3.3 Data Protection.....	11
4. CUSTOMER AND COMMUNITY	12
4.1 Customers.....	12
4.2 Suppliers	12
4.3 Community	13
5. ENVIRONMENT	14
5.1 Environmental Policy	14
5.2 Climate Change Policy	14

Amendment Control

All changes are recorded on the Amendment Record detailed below.

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CORPORATE SOCIAL RESPONSIBILITY POLICY

Hawkins Group of Companies 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 its 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 Hawkins Group of Companies Ltd 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 Hawkins Group of Companies Ltd and provide practical guidance for our managers and employees on the ground.

Compliance, monitoring and reporting

Compliance with this policy will be continuously monitored and subject to review by the directors and senior managers of Hawkins Group of Companies Ltd, supported by Harris Safety Solutions Ltd.

Each local 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 line manager, senior management, or other mechanisms established by Hawkins Group of Companies Ltd 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.

Hawkins Group of Companies 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 Hawkins Group of Companies Ltd's Code of Business Ethics, which is set out in Section 1. The other areas covered by this policy are Employment (Section 2), Customer and Community (Section 3) and Environment (Section 4).

1. CODE OF BUSINESS ETHICS

This code applies to all of the operations of Hawkins Group of Companies Ltd and sets out the minimum standards which Hawkins Group of Companies Ltd expects from staff in their internal and external dealings with colleagues, customers, stakeholders 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

Hawkins Group of Companies Ltd

- 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) Hawkins Group of Companies Ltd is committed to providing safe, value for money, high quality, and consistent, accessible and reliable services to its customers.

1.4 Shareholders

- a) Hawkins Group of Companies Ltd 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 and Stakeholders

- a) We aim to develop strong relationships with our suppliers, stakeholders 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) Hawkins Group of Companies Ltd will conduct their operations in accordance with the principles of fair competition and applicable regulations.

1.6 Compliance with Law

- a) All members of Hawkins Group of Companies Ltd 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

- a) No Hawkins Group of Companies Ltd 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, Hawkins Group of Companies Ltd Legal Director or General Counsel.
- b) Hawkins Group of Companies Ltd accounting and other records and supporting documents must accurately describe and reflect the nature of the underlying transactions.
- c) No undisclosed or unrecorded account, fund or asset will be established or maintained.
- d) Hawkins Group of Companies Ltd will not facilitate, support, tolerate or condone any form of money laundering.

1.8 The Environment

- a) Hawkins Group of Companies Ltd is committed to making continuous improvement in the management of its environmental impact.
- b) We will work with our partners to promote environmental care, increase understanding of environmental issues and disseminate good practice.

1.9 Community Involvement

- a) Hawkins Group of Companies Ltd 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 Hawkins Group of Companies Ltd respects the privacy of its employees, all Hawkins Group of Companies Ltd employees are expected to avoid personal activities and financial interests, which could conflict with their responsibilities to Hawkins Group of Companies Ltd.
- b) Hawkins Group of Companies 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 line manager.
- e) 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.
- f) Where information is confidential, that confidentiality must be respected.

2. SAFETY AND SECURITY

2.1 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 you cannot do it safely, 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:

2.2 General Statement

It is the policy of Hawkins Group of Companies Ltd to manage its activities without causing unnecessary and unacceptable risks to the health, safety and welfare of its employees, customers, members of the public and others who may be affected by its activities; so far as reasonably practicable. It also recognises its responsibility for other persons when they are on our / Hawkins Group of Companies Ltd premises.

The Director/s at Hawkins Group of Companies Ltd are committed to ensuring, so far as reasonably practicable, the health and safety at work of all its employees. This commitment extends to the provision of the human and material resources necessary for the proper discharge of its own statutory duties and for the proper discharge of the duties and responsibilities of its managers, supervisors and workforce in connection with health and safety at work. As well as complying with the statutory requirements of the Health and Safety at Work etc Act 1974 and other statutory instruments; the Directors aim is to establish best practice and to use best, established methods of management within our operations as we seek to further develop this through a process of continual improvement.

Each employee will be given such information, instruction and training necessary to enable the safe performance of work activities.

Competent people will be appointed to assist us in meeting our statutory duties including, where appropriate, specialists from outside the organisation.

The Director/s of Hawkins Group of Companies Ltd expect that all of its employees will act in a responsible manner and fully co-operate in the implementation of Hawkins Group of Companies Ltd Health and Safety Policy and in ensuring that safe working is an integral part of each and every task. Each individual has a legal obligation to take reasonable care for his or her own health and safety, and for the safety of other people who may be affected by his or her acts or omissions.

Hawkins Group of Companies Ltd actively encourages employees to suggest improvements to further improve safe systems of work.

In order to achieve the process of continual improvement, annual management objectives are established at the beginning of each calendar year. Planning and implementing of this Policy is achieved through the process of risk management, observance of legal requirements and suitable management arrangements, as laid out in our Health and Safety Management Systems.

The Director/s of Hawkins Group of Companies Ltd undertake to ensure that suitable and sufficient resources - in terms of time, finance and personnel are made available to carry this policy to full effect.

This policy will be regularly monitored, reviewed in the light of legislative or organisational changes and on an annual basis and updated as necessary.

The nine key safety principles with which all Hawkins Group of Companies 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 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 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 supervisor or manager.

We also require contractors to comply with this policy whilst they are working at our premises or sites.

3. EMPLOYMENT

In formulating its employment policies, Hawkins Group of Companies 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 Hawkins Group of Companies Ltd and its subsidiaries.

3.1 Equal Opportunities and Diversity Policy

- a) The Directors of Hawkins Group of Companies Ltd is committed to equality of as an employer. This policy sets out Hawkins Group of Companies Ltd's commitment to treat equally and with fairness at all times its employees, customers, contractors 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 Directors of Hawkins Group of Companies Ltd:
 - 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.
- d) Legislation and Codes of Practice
 - We will comply with and exceed where possible, current national and international legislation and relevant codes of practice in the countries
 - Where we operate. We will monitor our compliance with this policy and the requirements of relevant underpinning legislation as appropriate.
- e) Partner Organisations
 - We are committed to actively working with partner organisations to ensure our policies, procedures and practices are in line with best practice.
- f) Access to Company Premises
 - We will take all reasonable steps to ensure that our buildings and premises are accessible to disabled employees, customers and visitors as required by the Disability Discrimination Act (DDA) in the United Kingdom.

g) Recruitment

- 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.

h) Staff Training

- We will provide our staff with the necessary guidance and training to ensure the effective implementation of this policy and to ensure we are an inclusive employer.

i) Complaints

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

j) Reporting

- We are committed to monitoring and reporting on our actions and achievements in relation to implementing this Diversity policy both internally and externally.

k) Audit

- 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

Hawkins Group of Companies 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 staff.

- a) We will treat all employees fairly and honestly, regardless of where they work. All staff will have agreed terms and conditions in accordance with local law or practice and will be given appropriate job skills training.
- b) We 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) We 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. We 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) We will negotiate in good faith with the properly elected representatives of our employees.
- g) We will abide by the non-discrimination laws in every country where we operate.

- h) We will not use or condone the use of corporal punishment, mental or physical coercion or verbal abuse. We have disciplinary procedures for any member of staff whose conduct falls below the required standard.
- i) We have formal grievance procedures through which staff can raise personal and work-related issues.
- j) All staff will be given reasonable access to bathroom and rest facilities.

3.3 Data Protection

- a) We will comply with the relevant principles governing data protection in each country in which we operate.

4. CUSTOMER AND COMMUNITY

4.1 Customers

We will:

- act in accordance with fair business, marketing and advertising practices and take all reasonable steps to ensure the safety of our services.
- respect the human rights of our customers – our security and revenue protection arrangements are consistent with international standards for law enforcement.
- not make representations or omissions nor engage in any other practices that are deceptive, misleading, fraudulent or unfair.

4.2 Suppliers

Ethical Purchasing Policy

- We purchase a wide range of goods and services required in the operation of our business and we also rely heavily on a number of key suppliers for the delivery of our core services. Good working relationships with our suppliers are therefore central to the success of our business. For this reason, we clearly state our purchasing policy as part of ensuring that our business standards are integrated throughout the supply chain.
- We are committed to obtaining and retaining competitive goods and services while at the same time ensuring they are from sources which have not jeopardised human rights, safety or the environment.
- We aim to develop strong relationships with our suppliers, based on mutual trust, understanding and respect.
- More specifically we expect our suppliers to:
 - Adhere to business principles consistent with our own.
 - Ensure that their products and services are produced and delivered to comply with all legislation relevant to their business.
 - Seek to maintain continuous improvement in their supply chain relationship with us.
 - Ensure they adopt and implement acceptable safety, environmental, product quality, product stewardship, labour, human rights, social and legal standards in line with our own code and to ensure these issues are acceptably managed within the supply chain for any products supplied to us.
- We will seek to work with our key suppliers to:
 - Develop long-term meaningful relations to the benefit of both parties.
 - Improve the quality, environmental performance and sustainability of goods and services where this can be achieved to the benefit of both parties.

4.3 Community

Hawkins Group of Companies Ltd considers its role in local communities to be an integral part of the business and we are proud of the communities we both live and work in.

We actively seeks to:

- Employ local people and utilise local subcontractors and suppliers
- Become involved with local business and professional forums
- Support local charities and events

Equally important is how our many construction sites respond to the communities they interact with. No matter how hard we try, we know that construction work can sometimes cause disturbance such as noise, dust, vibration and disruption to traffic.

We are committed to ensuring those people who may be affected by our activities are always aware of what will be happening and that any inconvenience is minimised. We communicate with local people through a variety of methods including newsletters, letter drops, notice boards, personal visits, our website, local press, and when appropriate, special open days.

We encourage employees to become actively involved in fundraising for charities chosen on a local or personal level.

Our employees are also often involved with local schools and universities, giving their time to promote construction as a career and aid students' personal development. Employees help with guided site tours and project presentations and by hosting students and mentoring them in particular specialist areas of our business.

5. ENVIRONMENT

5.1 Environmental Policy

We fully recognise our responsibility to manage the impact of our activities on the environment and are committed to good environmental practice.

Our employees undergo mandatory and ongoing training in environmental awareness. Our Consultant advisors provide assistance and guidance in environmental matters, including the widespread use of environmental opportunity and risk assessments on all projects

Waste management is of the utmost importance. To divert waste away from landfill we operate a reduce, reuse, recycle hierarchy, starting with careful selection, ordering and use of materials. We are committed to the development of our environmental key performance indicators and the fulfilment of our waste minimisation strategy.

Wherever possible we will use our influence with clients and their designers to improve the whole-life environmental performance of construction projects, to establish energy-efficient and sustainable solutions.

We are taking steps to monitor our carbon emissions and are already measuring some sources of CO2 emissions that are easily quantified, including:

- Electricity and gas usage in offices
- On site fuel usage
- Use and methods of transport

In the near future this information will be used to set targets for reduction.

5.2 Climate Change Policy

Climate change has now been recognised as an international issue with national governments on both sides of the Atlantic committed to taking action to reduce greenhouse emissions. As a major transport operator we recognise that we emit greenhouse gases from operating our vehicle fleet. At the same time we have a role in supporting governments and communities to reduce the impacts of climate change from road transport by helping to reduce traffic congestion and air pollution by offering a real alternative to the car. We are committed to reducing the greenhouse gas emissions from our operations in a way which supports national government strategies and in line with our commitment to our passengers to provide safe, efficient and reliable services.

Our key climate change commitments are:

- To assess the potential impact to our business from evolving climate change policies as part of our on-going risk management processes.
- To work actively with our suppliers to improve the fuel efficiency of our vehicles.
- To report annually on our greenhouse gas emissions from all vehicles and property in our ownership.
- To actively promote improved energy efficiency and fuel efficiency within our business.
- To support research into transport policy and the use of alternative fuels.
- To stay abreast of alternative fuel developments and continue to assess their commercial viability.