

ETHICAL TRADING POLICY

Policy Statement

The Regional Director and all SCCS personnel are responsible for maintaining the highest standards within our business operations.

The Company aims to trade in an ethical manner within all its business interactions thus promoting fair & responsible trading with its business partners.

The Company operates in a sustainable and fair manner.

This policy demonstrates our Company values. These include (but are not limited to):

- Carrying out business operations with complete integrity (never compromising on doing the right thing).
- Carrying out business operations in a manner consistent with all applicable legislation including, but not limited to, safety and employment legislation.
- Observing recognised best practices and implementing them.
- Striving to operate in a manner that reduces the impact of its operations upon the environment.
- Working closely with interested stakeholders to meet required industry standards.
- Working closely with our supply chain to ensure the highest standards are adopted throughout its supply chain.
- Maintaining suitable policies and procedures (clearly communicated) setting out required methods of working and how these will be monitored/reviewed.
- Providing a clearly communicated structure for personnel within the Company to report any ethical or other concerns (for resolution) without fear of recrimination.

This policy should be read in conjunction with the Company Code of Business Conduct.

Scope

This policy statement applies to:

- All Company business operations for the purpose of the supply, hire, repair, service and calibration of surveying equipment to its customers.
- All Company business operations for the purpose of providing technical support, consultancy and training pertaining to surveying equipment to its customers.
- All business operations pertaining to the procurement of services & products from its business partners/suppliers.
- All business operations pertaining to the engagement of personnel for the purpose of carrying out Company business operations.

ETHICAL TRADING POLICY

Policy Reference:	011.6.2016.PL
Revision No:	9
Date of 1 st Issue:	29/02/2016
Date of Revision:	17/11/2023
Reviewed by:	Roz Wankling
Approved by:	Kevin Smith

Definitions

“**Company**” shall mean SCCS.

“**Management Team**” shall mean the Regional Director and such other senior personnel as deemed appropriate.

Responsibilities

Management is responsible for ensuring personnel are provided with the guidance required to complete the duties for which they are retained in a manner consistent with Company policies and practices.

Management is responsible for monitoring the implementation, review and audit of this and all Company policy/practices although this may be delegated as deemed appropriate.

Management is responsible for acting consistently with Company policy creating a positive role model to personnel.

Management is responsible for listening to concerns and responding appropriately in accordance with this and all other relevant Company policy.

SCCS personnel (whether directly or indirectly retained on behalf of the Company) are responsible for ensuring they have understood the remit of this policy (and all applicable Company policies).

SCCS personnel are responsible for working in accordance with Company policy, practices and as trained.

SCCS personnel are responsible for undertaking the role for which they are retained in a manner consistent with the highest ethical standards, integrity, and respect.

SCCS personnel are responsible for reporting ethical or other concerns to Management in accordance with Company policy.

Policy Aim & Commitments

Company Commitment:

The Company is committed to:

- Work with its supply chain to encourage suppliers to adopt & adhere to acceptable codes of practice within their operations.
- Act in manner which is fair and transparent within its business dealings.
- Adhere to all applicable UK and other Employment Legislation.
- Adhere to all applicable UK and other Safety Legislation.

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- Adhere to all applicable legislation pertaining to its operations such as (but not limited to) human rights and working time regulations.
- Adhere to Government recognised trading practices.
- Not trade with those it believes are violators of human rights.
- Not trade with those it believes to be exploiting humans or the environment.
- Work with its supply chain to ensure the highest standards of business practice are achieved and all supplies sourced are fit for purpose and compliant with UK legislative requirements.
- Develop close working relationships with its key suppliers to ensure sourcing of supplies is ethical & sustainable.
- Promote a collective commitment to good working practices.

Company Aims

The Company aims to:

- Carry out its operations in an open & transparent manner.
- Actively recruit from its local employment base whilst actively encouraging a diverse range of applicants to encourage diversity within its personnel.
- Provide safe & hygienic working conditions.
- Provide a fair and comparable (market rate) wage above national living wage rates to its personnel compared to other employers carrying out similar business operations (within its geographical region).
- Promote equality of opportunity within the workplace.
- Actively take steps to reduce the environmental impact the Company has on the environment in which it operates.
- Operate a zero-tolerance regime to bullying, discrimination, harassment within the workplace.
- Operate a zero-tolerance regime toward bribery & corruption within the workplace.
- Operate a zero-tolerance attitude toward modern slavery practices within its supply chain, own operations, and business partners.
- Work closely with its carefully selected suppliers to ensure suitable standards of business practices are operated by our business partners.

Conflicts of interest

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A conflict of interest can happen when our personal, social, financial, or political activities interfere, or appear to interfere, with our responsibilities to the Company.

There are two types of conflict of interest: workplace and commercial. The Company requires its personnel (and those acting on its behalf) to avoid these.

A workplace conflict of interest occurs when an outside activity or connection could cause, or be perceived to cause, a conflict with the role for which they are retained (or the decisions they make in that role).

Examples:

- Undertaking external duties that might cause fatigue thus creating a conflicting priority with that individual's role with the Company.
- Making decisions that result in preferential treatment given based on an established connection already held (influencing the decision made).

A commercial conflict of interest could occur if an association already held with a particular supplier/company affects, or appears to affect, your impartiality when making business decisions.

Examples:

- Approving a supplier for use because you know a person rather than following procedures.
- Favouring a supplier or external company that you are an ex-employee of.

SCCS personnel (and persons acting as an agent on behalf of the Company) must take all reasonable steps to ensure their outside activities do not interfere with their ability to fulfil the requirements of the role for which they are retained.

SCCS personnel (and persons acting as agent on behalf of the Company) must take all reasonable steps to ensure that strict business confidentiality (and all data protection requirements) are always observed.

All SCCS personnel (and persons acting as an agent on behalf of the Company) are required to report potential conflicts of interest in accordance with associated company policy (such as the Company Whistleblowing policy).

Framework for conducting Ethical Trading

The Company will strive to attain & surpass its aims through:

- Management business planning.
- Monthly departmental one to one sessions.
- Operating an open-door policy to all its personnel.

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- Operating a Quality Control and Health & Safety Management system which has been audited and approved by RISQS.
- Produce annual safety/environmental targets and monitor success against targets set.
- Actively work with its personnel to help them achieve their full potential and realise suitable opportunities within the workplace.
- Work closely with its supply chain in accordance with its supplier procedure practices.

Compliance & Review

The Management Team will be responsible for managing the compliance of all personnel with the remit of this quality policy and all working procedures.

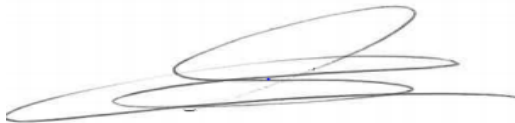
The Management Team are responsible for managing corrective action resolution.

The Management Team are responsible for the appropriate review of the remit of this policy and appropriateness of its working procedures to meet its quality objectives.

These requirements may be delegated (by Management) as deemed appropriate.

All SCCS personnel are responsible for working as trained and in accordance with Company policy and practice.

Signed:



Print name: Kevin Smith

Position: Regional Director UK

Revision

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Date: 17th November 2023

Next review: 16th November 2024