

Ethical Policy

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1. General Statement

CCM Facilities Ltd (referred to as CCM) and associated companies are committed to protecting employees, clients, suppliers and the company from illegal or damaging actions by individuals, either knowingly or unknowingly.

CCM recognise the responsibility that we share with our suppliers to provide services and source products in an ethical manner. We want our customers to be confident that the people who are employed by CCM and make our products are treated fairly, are not exploited and are not exposed to unsafe working conditions.

Our Ethical Policy is a core element of our commitment to fairness, honesty and integrity supported by associated policies based on fundamental human and business ethics.

CCM’s Ethical Policy is based on following an Ethical Trading Code (ETC) covering:

1. Employment is freely chosen
2. Freedom of association and the right to collective bargaining are respected
3. Working conditions are safe and hygienic
4. Child labour shall not be used
5. Remuneration -Living wages are paid
6. Working hours are not excessive
7. No discrimination is practised
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed
10. Entitlement to Work
11. Compliance with relevant statute Laws & Regulations

<p>Endorsed by;</p>	 <p>Greg Doherty, Managing Director:</p>	<p>Dated: 01/06/2019</p>
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We encourage initiatives to pay relevant living wages in the UK, subject to client agreement. We fully support all minimum wage requirements.

As a precondition of trading business with CCM we intend that suppliers meet agreed standards for the implementation of codes of labour practice with transparent performance measures. This Ethical Policy seeks to make substantial improvements in the lives of poor working people around the world by developing a set of standards through the Ethical Trading Code (ETC) and encouraging its use by suppliers.

This Code of Conduct applies to CCM and all suppliers that produce goods or services for CCM or any of its associated companies. Suppliers to CCM are from predominantly in the UK but may source from different countries, nationalities and cultures. The Supplier Code of Conduct represents a commitment to source goods and services only from persons and firms that achieve UK and internationally recognised standards and practices in dealing with their workers and their working environment.

2. Definition

Relating to moral principles or the branch of knowledge dealing with these.

3. Scope

CCM and all its suppliers currently meet and will continue to meet, so long as they act as a supplier to CCM, each of the following standards:

1. Employment is freely chosen

There is no forced, bonded or involuntary prison labour.

Workers are not required to lodge monetary deposits or their identity papers with their employer and are free to leave their employment after reasonable notice.

2. Freedom of association and the right to collective bargaining are respected

Workers have the right to join or form trade unions of their own choosing and to bargain collectively.

The employer adopts an open attitude towards the activities of trade unions and their organisational activities.

Workers' representatives are not discriminated against and have access to carry out their representative functions in the work place.

Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates and does not hinder the development of parallel means for independent and free association.

3. Working conditions are safe and hygienic

A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards.

Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable the causes of hazards inherent in the working environments.

Workers shall receive regular and recorded health and safety training.

Workers are provided with access to clean toilet facilities and to potable water, and, if appropriate sanitary facilities for food storage shall be provided.

Accommodation where provided, shall be clean, safe and meet the basic needs of the workers.

A senior management representative shall be responsible for Health & Safety.

4. Child labour shall not be used

There shall be no use of child labour.

In the event of any child found to be performing child labour, they shall be removed from the workplace immediately. The supplier shall then participate and contribute to the provision for the transition of the child to enable her or him to attend quality education until no longer a child.

Young persons under 18 shall not be employed at night or in hazardous conditions.

These policies and procedures relating to Child Labour shall conform to the provisions of the relevant International Labour Organisation (ILO) Standards.

5. Remuneration

Wages and benefits paid for a standard working week meet, at a minimum, national legal or industry benchmark standards, whichever is higher. In any event wages shall always be enough to meet basic needs and to provide some discretionary income.

All workers shall be provided with written and understandable information about their employment conditions including information with respect to wages before they enter employment, and about the particulars of their wages for the pay period concerned each time they are paid.

Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

6. Working hours are not excessive

Working hours must comply with national laws, collective agreements, and the provisions defined in the clauses below, whichever affords the greater protection for workers.

Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week *

The hours worked in any 7 day period shall not exceed 60 hours

7. No discrimination is practised

There is no discrimination in hiring, salary, Benefits, compensation, access to training, promotion, discipline, termination or retirement based on colour, race, caste, national origin, religion, age disability, gender, marital status, maternity, sexual orientation, union membership or political affiliation.

8. Regular employment is provided

To every extent possible work performed must be on the basis of recognised employment relationships established through national law and practice.

Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting and home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

9. No harsh or inhumane treatment is allowed

Suppliers provide a workplace in which any form of harassment is unacceptable. Examples include physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidations.

10. Entitlement to work

Only workers with a legal right to work in the country should be employed.

For both workers and agency workers, original documents should be reviewed and then returned to workers to verify right to work.

11. Compliance with relevant statute Laws & Regulations

CCM and its suppliers will comply with all laws and regulations to which it is subject, including those applicable to the environment.

13. Charitable Donations

CCM continue to make a number of Charitable Donations each year. No 'Political' donations are made.

4. Ethical Strategy

Our Ethical Policy strategy will be delivered through the CCM Associated Policies, CCM Staff Handbook issued to all employees and the Suppliers Pre-Qualification Questionnaire Selection & Compliance Process

5. Policy

5.1 Directors Commitment to Ethics

Senior leaders and Directors within CCM must set a prime example. In any business practice, honesty and integrity must be top priority for Directors.

Directors must have an open door policy and welcome suggestions and concerns from employees. This will allow employees to feel comfortable discussing any issues and will alert Directors to concerns within the work force. Directors must disclose any conflict of interests regard their position within CCM.

5.2 Employee Commitment to Ethics

CCM employees will treat everyone fairly, have mutual respect, promote a team environment and avoid the intent and appearance of unethical or compromising practices. Every employee needs to apply effort and intelligence in maintaining ethics value. Employees must disclose any conflict of interests regard their position within CCM. Employees will help CCM to increase customer and vendor satisfaction by providing quality services, products and timely response to inquiries. Employees should consider the following questions to themselves when any behaviour is questionable:

- Is the behaviour legal?
- Does the behaviour comply with all appropriate CCM policies?
- Does the behaviour reflect CCM values and culture?
- Could the behaviour adversely affect company stakeholders?
- Would you feel personally concerned if the behaviour appeared in a news headline?
- Could the behaviour adversely affect CCM if all employees did it?

5.3 Company Awareness

Promotion of ethical conduct within interpersonal communications of employees will be rewarded.

CCM will promote a trustworthy and honest atmosphere to reinforce the vision of ethics within the company.

5.4 Maintaining Ethical Practices

CCM will reinforce the importance of the integrity message and the tone will start at the top. Every employee, manager, director needs consistently maintain an ethical stance and support ethical behaviour.

Employees at CCM should encourage open dialogue, get honest feedback and treat everyone fairly, with honesty and objectivity.

CCM has established a best practice disclosure committee to make sure the ethical code is delivered to all employees and that concerns regarding the code can be addressed.

5.5 Unethical Behaviour

CCM will avoid the intent and appearance of unethical or compromising practice in relationships, actions and communications.

CCM will not tolerate harassment or discrimination.

Unauthorized use of company trade secrets & marketing, operational, personnel, financial, source code, & technical information integral to the success of our company will not be tolerated.

CCM will not permit impropriety at any time and we will act ethically and responsibly in accordance with laws.

CCM employees will not use corporate assets or business relationships for personal use or gain.

5.6 Policy Compliance

Compliance Measurement

The CCM Compliance Team will verify compliance to this policy through various methods, including but not limited to, business tool reports, internal and external audits, and feedback.

Exceptions

None.

5.7 Non-Compliance

An employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

6. Associated Policies & Points of Reference

Our associated policies & Points of Reference to further support the Ethical Policy are the following:

- Mission Statement
- Living Wage Foundation Member
Recognised Service Provider
- Staff Handbook

- Anti-Slavery Policy & Statement Policy
- Bribery Policy
- Business Continuity Policy
- Community Involvement Policy
- Corporate Social Responsibility Policy
- Data Protection Policy
- Disciplinary Policy & Procedure
- Diversity Policy
- Employment of Young People & Children
- Environmental Policy & Statement
- Equal Opportunities Policy
- Equality & Diversity Training Policy
- Ethical Policy
- Green Transport Policy
- Green Waste Policy
- Grievance Policy & Procedure
- Health & Safety Policy/Manual
- Home Workers Policy
- Integrated Management System (IMS) Policy & Statement
- Maternity, Paternity, Adoption & Parental Leave Policy
- Recruitment Policy
- Safety from Violence & Abuse at Work Policy
- Sickness Absence Policy
- Stress Policy
- Sub-contractors Policy & Control
- Sustainability Policy
- Training & Development Policy
- Water Efficient Practices Policy

All CCM Policies are available on request to CCM's head office or via our Website at www.ccmfacilities.com