

Corporate Social Responsibility Policy

Aspen Build (East Anglia) Ltd is very aware of its corporate social responsibility and the detrimental impact our construction activities and that of our supply chain could have to the local, national and worldwide environment, ecology and civilian populations. It is our intention to ensure our activities' impact is as low as practicably possible.

The principles encompassed in this policy cover all areas of the companies operations and have been developed and continue to be reviewed against and updated by reference to relevant codes of corporate governance and international standards. The company supports the principles set out in those codes and standards and the aim of this policy is to translate that support into guidelines and standards that set a common approach for Aspen Build (East Anglia) Ltd to provide practical guidance for our managers and employees.

Compliance and reporting in relation to this policy will be continuously monitored and subject to review.

Each 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 have reason to suspect that there has been a breach of this policy must report it to their line manager or senior management in accordance with mechanisms established by the company to report such breaches.

We recognise that employees may be reluctant to report concerns for fear of retaliation. We 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.

The Company 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 Aspen Build (East Anglia) Ltd code of business ethics.

SECTION 1 CODE OF BUSINESS ETHICS

This code applies to all of the operations of Aspen Build (East Anglia) Ltd and sets out the minimum standards which the senior management team 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 Our Employees

- (a) We are committed to creating and maintaining a safe and healthy working environment for our employees and supply chain members.
- (b) We 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) We 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) We 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) We will maintain good communications with employees through our information and consultation procedures.
- (f) We will assist employees in realising their potential.

1.3 Our Clients

- (a) Aspen Build (East Anglia) Ltd is committed to providing safe, value for money, high quality, consistent, accessible and reliable services to its' clients.

1.4 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) Aspen Build (East Anglia) will conduct their operations in accordance with the principles of fair competition and applicable regulations.

1.5 Compliance with Law

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

1.6 Business Integrity

- (a) No Aspen Build (East Anglia) Limited member of staff 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 a bribe. If an employee is in any doubt as to whether he or she may accept an offer, that employee should discuss the issue with the Managing Director.
- (b) All 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) Aspen Build (East Anglia) Ltd will not facilitate, support, tolerate or condone any form of money laundering.

1.7 The Environment

- (a) Aspen Build (East Anglia) Ltd is committed to making continuous improvement in the management of its' environmental impact.
- (b) We will work with our supply chain partners to promote environmental care, increase understanding of environmental issues and disseminate good practice.

1.8 Community Involvement

- (a) Aspen Build (East Anglia) Ltd strives to be a good corporate citizen and to fulfil our responsibilities to the societies and communities in which we operate.

1.9 Conflicts of interest and confidentiality

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

SECTION 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 "Think Safe, Be Safe!" We have developed the following high-level health and safety policy, which underpins all of our operational health and safety policies:

- a) Aspen Integrated Management system (AIMS)

Section 3 Safety Health and Environment Policy & Manual sets out procedures that have been developed and issued to all staff members and are available for reference in the head office and site offices.

The procedures within the SHE policy should be followed by all staff members.

Michael Betts

Michael Betts
Managing Director

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