

# CORPORATE SOCIAL RESPONSIBILITY & ETHICAL CONDUCT POLICY

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## Policy Statement

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Carmichael<sup>UK</sup> is committed to operating its business in a manner that is both sensitive and responsible with proper regard to its legal obligations and according to relevant directives, regulations and codes of practice. It is also committed to supporting the Government's vision for Corporate Social Responsibility in terms of businesses taking account of their economic, social and environmental impacts, specifically:

- Promoting business activity that brings simultaneous economic, social and environmental benefits.
- Encouraging innovative approaches and continuing development and application of best practices.
- Ensuring best minimum levels of performance in areas such as health & safety, the environment and equal opportunities.
- Creating a framework that facilitates business practices that balance profit and success with achievement of social and sustainability goals.
- Taking an active part in supporting the local community and social causes
- Creating real opportunities for local people and local enterprise development.
- Providing a rewarding, challenging and great place to work.

Corporate Social Responsibility is also touched on in several other company policies including:

- Ethics & Business Integrity Policy.
- Environmental Policy.
- Health & Safety Policy.
- Equality, Diversity & Inclusion Policy.
- Anti-Bribery & Anti Corruption Policy.

## Commitment to Corporate Social Responsibility

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The company recognises that its operations have an effect on the communities and environment in which it operates. In light of this, the company is committed to operating in a socially responsible manner, supporting a number of local communities and social causes, as well as operating in an environmentally sustainable manner.

## Local Community & Social Responsibilities

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Carmichael<sup>UK</sup> is proud to support local community projects as well as a range of deserving and charitable causes. To prevent funding or charitable donations from being misappropriated or

interpreted as a bribe, we carry out appropriate due diligence to ensure that the recipients are bona fide and that money raised is used for its intended purpose. This includes ensuring that donations are made to legitimate organisations or that beneficiaries are identified. Donations over the last 4 years can be found in Appendix A

It is our objective to ensure that charitable donations, contributions or sponsorships genuinely benefit the causes to which they are given and that funds are not misappropriated or interpreted as bribery. As a company we will carry out due diligence to ensure that the recipients of any donations, contributions or sponsorships are bona fide and that the funding will be used for the purpose that it is intended. We will do this by ensuring that:

- Donations are only made to registered charities or that the recipients of any other donations are researched to ensure that they are legitimate and the beneficiary (be that an individual, company or charity) is identified and approved in advance unless otherwise authorised by the Managing Director.
- An audit trail is maintained of all donations and sponsorships to enable them to be monitored to ensure funds are being used as agreed.

## Our Staff

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We are committed to ensuring that we provide a motivational, fulfilling and fun environment in which to work. We focus hard on recruiting and retaining the best people, recognising their achievements and rewarding their efforts.

We believe that much of our success can be attributed to the values that we hold and that are embedded throughout the organisation which include:

- Honesty
- Integrity
- Professionalism

## Clients & Candidates

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Carmichael<sup>UK</sup> is an active member of the Recruitment & Employment Confederation (REC) and The Employment Agents Movement (TEAM). We encourage and support our consultants to become members of the REC giving us the assurance that we are fair and professional in our dealings with both clients and candidates. As members of REC and TEAM we also abide by their codes of conduct / practice and meet all legislative and best practice standards.

## Environmental Management Programme & Objectives

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Whilst Carmichael<sup>UK</sup> does not produce any emissions or pollutants that come under the Integrated Pollution Prevention and Control Regulations, the company has identified that it's most significant impacts on the environment include:

- Disposal & recycling of waste (including paper, consumables and electronic equipment).
- Energy & water usage.
- Transport and company car usage.

- Purchase of consumables.
- Maintenance of buildings.

Methods for meeting the objectives within the Environmental Management Programme include:

- Maximising the reuse, recycling and sustainable disposal of waste.
- Minimising unnecessary energy usage and waste.
- Minimising the impact of company car usage.
- Purchasing consumables in an environmentally sustainable and fair manner.
- Minimising unnecessary water usage and waste.
- Ensuring that buildings are maintained in a manner that minimises environmental impact.

We have in place a full environmental policy which details how these impacts will be monitored, managed and wherever possible, reduced.

## Equal Opportunities

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It is the aim of Carmichael<sup>UK</sup> is to create an environment that encourages and values diversity within its workforce and builds on the differences individuals bring, enabling the company's continued success. We aim to draw upon the widest possible range of views and experiences in order to meet the changing needs of our staff, clients and partners.

We seek to promote diversity and to respond to the needs of all individuals in a fair and equitable manner, whilst observing our commitment and responsibility to current legislation (including the Equality Act 2010).

Our approach to equal opportunities applies equally to both our own employees and the way in which our recruitment services are offered to clients and candidates.

## Health & Safety

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It is the Company's duty to ensure, so far as is reasonably practicable, the health, safety and welfare at work of all employees. This requires that regard is paid in particular to:

- Maintaining safe premises, as well as a healthy and safe working environment.
- Providing and maintaining safe systems at work.
- Providing health and safety information and training.
- Publishing and regularly updating a Company Safety Policy.
- Ensuring safety in the use of articles and substances.
- Conducting special risk assessments for expectant, new mothers and young persons
- Providing such information, training, instruction and supervision as is necessary to ensure the health and safety at work of all employees.

## Ethical Purchasing & Procurement

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Carmichael<sup>UK</sup> is committed to procuring its works, goods and services in an ethically and environmentally sensitive way, yet with proper regard to its commercial obligations, ensuring that suppliers deliver to agreed timescales, quality and cost.

Purchasing is undertaken in a manner that encourages competition, and offers fair and objective evaluation of offers from all potential suppliers.

Purchase of goods and services with an annual value in excess of £10,000 excluding VAT will be conducted according to the following principles:

- Completion of a business case to evidence the need to purchase.
- Procurement practices will be transparent, auditable and fair.
- Research will be conducted to ensure a clear understanding of the risks associated with the purchase of goods and services, and purchasing decisions will include contingency and risk mitigation strategies.
- Tendering (if appropriate) is based on both quality and cost, is evaluated in a fair, objective, and structured manner that actively encourages competition.
- We will encourage all protected groups/communities to participate in the procurement process.
- Company employees responsible for purchasing will not accept corporate gifts, or any type of solicitation that could be construed as enticement.
- The procurement process demonstrates that the approach taken to competition is rigorous, balanced and driven by service needs and market intelligence.
- Potential suppliers are ethical, sensitive to the environment and operate within EU and UK legislation and uphold similar ethical and moral standards to Carmichael<sup>UK</sup>. Carmichael<sup>UK</sup> reserves the right to investigate the ethical record of potential new suppliers before entering into any agreement and to request information from suppliers regarding the production and sources of goods supplied.
- The Company reserves the right to withdraw from any agreement or other arrangement with any supplier or partner who is found to have acted in contravention of the spirit or principles of this policy.
- Suppliers are able to demonstrate their ability to deliver continuous improvement and cost savings throughout the life of the contract.
- Business transactions will, where possible be conducted electronically.

## Information & Confidentiality

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Information received by employees, contractors or agents of the company will not be used for any personal gain, nor will it be used for any purpose beyond that for which it was given. The company will at all times ensure that it complies with all applicable requirements of data protection legislation in force from time to time.

## Conflict of Interests, Corporate Gifts & Hospitality

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Carmichael<sup>UK</sup> holds the trust and confidence of those with whom it deals, including clients, suppliers

and employees as fundamental to its success. Conflicts of interest potentially undermine the relationship of the Company with its partners. In order to help preserve and strengthen these relationships, the Company has developed rules and guidelines concerning the conduct of its officers and employees aimed at minimising the possibility of conflicts of interest.

The Bribery Act 2010 states that “genuine hospitality or similar business expenditure that is reasonable and proportionate” is not illegal and should not be counted as bribery. Employees, however, may not accept corporate hospitality or gifts which could be considered an incentive or enticement, particularly if they have the potential to place the recipient under any obligation or if they have the potential to create any type of conflict of interest.

Any corporate gifts or hospitality (whether being given or received) must be disclosed to and approved by the Managing Director prior to being given / accepted. Details of such gifts including the purpose of the gift, the giver and recipient, the nature of the gift/hospitality, its value and who has approved it must be fully documented in the Gifts/Hospitality Register. This register will then be audited by the Managing Director on a quarterly basis. Any corporate gift must be given openly (not in secret) in the name of the company and not be construed as coming from a particular individual. Gifts should not include cash or a cash equivalent.

Corporate gifts are aimed at thanking customers or suppliers for their loyalty and custom and not as an incentive or inducement for future favourable treatment or business.

Promotional gifts without significant value (e.g. stationery, chocolates, or other gifts under the value of £75) need not be disclosed, but should be shared with other employees. If it is felt that any gift received might constitute an act of bribery, then the gift must be passed to the Managing Director who will return it to the donor explaining the company policy.

Carmichael<sup>UK</sup> will operate in accordance with the policies, procedures and restrictions of its clients in relation to corporate hospitality, gifts or incentives where such information forms part of a contract or has been specified in writing to the company.

## Human Rights

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Carmichael<sup>UK</sup> is vehemently opposed to the use of slavery in all forms; cruel, inhuman or degrading punishments; and any attempt to control or reduce freedom of thought, conscience and religion.

The company will ensure that all of its employees, agents and contractors are entitled to their human rights as set out in the Universal Declaration of Human Rights.

The company will not enter into any business arrangement with any person, company or organisation which fails to uphold the human rights of its workers or who breaches the human rights of those affected by the organisation’s activities, in compliance with the Modern Slavery Act 2015.

## Review

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This policy will be reviewed regularly and may be altered from time to time in light of legislative changes or other prevailing circumstances.

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## Appendix A – Donations

Company Charitable Donations: Annual donation between £1,000 and £2,000 given to chosen Charity.

- Donation to the Pakistan Floods Appeal (£500)
- Damian Regan and The Christie Hospital (£200)
- Haiti Appeal (£2000)
- Donation to the St. Leonards Choir (£500)
- Wear it PINK day (£60)
- Lighthouse Charity (£20)
- Thame Youth Memorial Trust (£200)
- Donated prizes to local schools auction (prize raised roughly £500)
- Children In Need (£100)
- The Gurkha Welfare Trust (£500)
- Donation to the Make-A-Wish Foundation (£2,000)
- Equipment donation to Reading Deaf Club
- Donation to Helen & Douglas House (£2,000)
- Donation of £100 to Alexander's Fund
- Donation of £2000 to Construction Youth Group
- Donation of £200 to Meningitis Trust – Luke Farrelly Memorial
- Donation to Movember (£200)
- Donation to Latton GFC Soccer Team (£200)
- Donation to DEC Nepal Earthquake Appeal £1000
- Donation to Help the Philippines (£100)
- Donation to Bam Nuttall Christmas Toy Appeal (£706.91)
- Donation to Hochtief Christmas Raffle (Kindle HD)
- Donation Costain Foundation £200
- Donation BAM Nuttall Help for Heroes McMillan £750
- Donation ABC electrification Christmas Charity Auction £500

Funding for Employee / Contractor & Client Sponsored Activity:

- Sponsored Employees to run the London Marathon (£500 each on an annual basis)
- Sponsored Agency at Fitzpatrick Contractors to run the London Marathon (£200)
- Sponsored staff from BAM Nuttall to take part in the 3 Peaks Challenge (£500)
- Sponsored staff from Bam Nuttall to take part in the RBS Caledonian Challenge (£200)
- Sponsored employee at Nuttall to Walk for Life Charity (£200)
- Sponsored staff from Bam Nuttall for Wateraid (£200)
- Sponsored staff from Costain to take part in the 3 Peaks Challenge (£200)
- Sponsored staff from Costain to complete a 65 mile bike Challenge (£200)
- Sponsored staff from Costain to complete The London Rat Race (£200)

- Sponsored staff from Fitzpatrick to complete The Movember Challenge (£100)
- Sponsored staff from Balfour Beatty to complete The Comrades Marathon (£200)
- Sponsored staff from Costain to compete in the Care Construction Challenge Marathon (£200)
- Donation to Marie Curie Cancer Care (£100)
- Sponsored staff from Birse to complete in the Virgin London Marathon (£100)
- Sponsored staff from Balfour Beatty to compete in the Bupa Great North Run (£100)
- Sponsored staff from BAM Nuttall to compete in the London to Brighton Bike Ride (£200)
- Donation to Building Better Futures (£200)
- Donation to Ferrovial for the Employee of the Month Scheme (£50)
- Donation to Children with Cancer with Leukaemia (£100)
- Donation of two Chelsea v Arsenal match tickets to Bam Nuttall for Red Nose Raffle
- Sponsored Fiona Brunton for Race for Life (£50)
- Sponsored staff from Taylor Woodrow Bam Nuttall JV for Cancer Research UK, British Red Cross and The Passage (£200)
- Donation to Vinci (£200)
- Sponsored staff from Hillier Hopkins for PACE Flag Relay (£50)
- Sponsored staff for Stoptober (£100)
- Sponsored Sean Cavanagh VFL – London to Paris bike ride £200
- Sponsored to Graham Hoare – Three Peaks Challenge £200
- Sponsored London Lemurs RFC team £1000
- Paid for trench & water pump at Horsewyse (£10000)
- Young Carers Fun Day 2014 (£2000)
- Young Carers Halloween 2015 (£2000)
- Dogs for the Deaf (£2000)
- Young Carers Fun Day 2015 (£2000)
- Sponsored staff from VolkerFitzpatrick for the 3 Peaks Challenge - £200
- Sponsored Leigh Graham for the London Marathon - £200
- Sponsored Abel Lugar & Braam Truter from Dyer & Butler for the London Marathon - £200
- Sponsored client for the Real Rally - £200
- Sponsored client charity Supershoes - £200
- Sponsored a hearing dog at Hearing Dogs for the Deaf - £10,000
- Donation to VolkerFitzpatrick for their Charity Aquatic Relay - £100

#### Paid Time off & Voluntary work for Company Employees for Charitable & Sponsored Events

- Charity golf day (£320. + £200 donation)
- Attended Charity Ball (£450 + £340 auction bid)
- Attended Charity Dinner/Dance (£480)
- Two employees' erected log Cabins for local School (£50)
- 10 hours volunteered to Horsewyse for digging a trench for new water pump
- Give & Gain Charity Shop Day – 15 staff
- Give & Gain Gardening Day – 10 staff
- Give & Gain Painting Day – 10 staff
- Young Carers Fun Day 2014 – 10 staff
- Young Carers Halloween Party 2015– 10 staff
- Young Carers Fun Day 2016 – 10 staff

Carmichael<sup>UK</sup> lives its values by providing free support to jobseekers from the local communities in terms of acquiring job market skills. This includes providing individual help with:

- Focused job search activity;
- CV writing;
- Interview Techniques.