



# Corporate and Social Responsibility Policy

## PURPOSE

The aim of this policy is to highlight four key areas of corporate and social responsibility that are important to our company:

- Working with our neighbours in ways which result in a positive effect on our local communities.
- Ensuring a safe workplace where staff are properly trained and deployed, and all stakeholders are fairly treated.
- Striving to work with others in our marketplace that share these same aims.
- Striving to buy from suppliers that share these same aims

We take seriously all feedback that we receive from our stakeholders and, where possible, maintain open dialogue to ensure that we fulfill the requirements outlined within this policy. We have an Anti-bribery and Corruption Policy which clearly communicates how we conduct business, and which directly applies to all of our employees, subcontractors and other stakeholders in our business.

We are open, straightforward and sincere in communicating our strategies, targets, performance and governance to all of our stakeholders in relation our continual commitment to sustainable development. This policy will be communicated to our stakeholders and published on our website.

The Chief Operating Officer (COO) is responsible for the implementation of this policy and will make appropriate resources available to support the realisation of our corporate responsibilities. The responsibility for our performance in accordance with the objectives set out in this policy requires contribution from all employees throughout the company.

## SCOPE

This policy applies to all employees of the Newscast Media Group Ltd. and all of the companies within the Group. Employees must observe the highest standards of integrity and must act with care, diligence and fairness in all our business activities.

We recognize that we must integrate our business values and operations to meet the expectations of our customers, employees, regulators, investors, suppliers, the community and the environment. It is our expectation that our suppliers, sub-contractors and other business partners hold the same values as we do and meet at least the same standards.



# Corporate and Social Responsibility Policy

## POLICY AND PROCEDURE

### 1. The Community Around Us

Our standing within the local community is important to us and we encourage dialogue with local communities for our mutual benefit. We advertise all relevant jobs locally and work to maintain good relationships with local communities through the following fundamental activities:

- We will register and resolve complaints from the community in a prompt and attentive manner.
- We shall support and encourage our employees to help local community organisations and activities in our region including taking part in charitable events.
- Wherever possible we look to support local businesses by using them for our equipment servicing, building projects etc.
- The company has where appropriate taken on students from universities all over the UK for up to 1 year placements and from local schools giving children work experience. We also visit local schools with science awareness programmes.
- The company holds open days where our neighbours and other interested parties have the opportunity to visit our premises and can see what we do.

### 2. The Workplace

The well-being of our employees and other stakeholders is very important to us whilst in our workplace. We are committed to the continual improvement of labour standards and facilities within our company. The most important factor is that our employees and other stakeholders are safe whilst under our care and on our premises, much of this is detailed in our Health and safety policy. In addition:

- Our legal obligations on minimum working age will always be complied with. The use of forced labour or child labour is illegal – we will not form any business relationships where these practices are discovered or suspected.
- We provide, and will strive to maintain, a clean, safe and healthy working environment and we have policies in place to ensure this. We ensure that our employees working conditions suit the job they are doing and specifically they are properly trained, and resourced with the correct equipment and local environment (eg, lighting and temperature) that they need.
- We have a Dignity at Work Policy which operates to provide safeguards to ensure that all employees are treated with respect and without discrimination (sexual, physical or mental harassment or bullying of any kind).
- We operate an equal opportunities policy at all times.
- We offer our employees clear and fair terms of employment.
- We offer our employees relevant training when they need it and career development opportunities when we can in order to enable the continual development of the employee within the company.



# Corporate and Social Responsibility Policy

## The Workplace

- We maintain a clear and fair employee remuneration policy and maintain a well defined appraisal scheme.
- We will review employee working hours quarterly as recorded by door swipe in/out to ensure that no employees are inadvertently working outside of the European Working Time Regulations 1998
  - ◇ Audit quarterly door entry swipe in/out records and calculate: time on premises and weekend working hours
  - ◇ Highlight and discuss exceptional working time records with staff members if they occur
  - ◇ We will include and record the discussion of working hours in employee 6 monthly appraisals / review with line managers.
  - ◇ Agency workers shall be employed as per agreements we have with the Agencies and at least to the minimum standard required in law
- Notwithstanding any of the above, we fairly apply at least the minimum standards in all aspects of employment as defined by current UK employment law or the prevailing laws in the countries in which we are operating.



# Corporate and Social Responsibility Policy

## A separate statement on Modern Slavery

This statement is made to pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes Newscast Media Group Ltd. slavery and human trafficking statement.

### Introduction

Newscast Media Group Ltd. recognises that all businesses have an obligation to prevent slavery and human trafficking. Every company must do its share to eradicate this modern-day scourge. Newscast Media Group Ltd. will do everything within its power to prevent slavery and human trafficking within its business and within the supply chains through which it operates.

Newscast Media Group Ltd. recognises that, because of the nature of its business and clients and the need to comply with its quality standard, this reduces the risk that it will be engaging directly in human trafficking and slavery but, nevertheless, acknowledges that it has a part to play.

### Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Newscast Media Group Ltd. operates to ensure fairness in the recruitment, retention and development of all employees and it seeks to comply with all applicable employment legislation. The company seeks to provide a work environment where employees are treated with respect, dignity, and consideration.

Newscast Media Group Ltd. monitors its supply chains, and its suppliers so ensure, so far as is possible, that slavery and human trafficking are not taking place within those supply chains.

### Due diligence process for slavery and human trafficking

As part of our commitment to identify and eradicate slavery and human trafficking from within our business and from those businesses with which we interact, we:

- Work closely with our supply chains to ensure compliance with legislative obligations and we expect those organisations to have suitable anti-slavery and human trafficking policies and processes. In the absence of those policies, we expect our suppliers to acknowledge and abide by this policy.
- We seek to build long standing relationships with suppliers and to make clear our expectations of ethical business behaviour from them.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.



# Corporate and Social Responsibility Policy

## Supplier adherence to our values

Newscast Media Group Ltd. has a zero-tolerance view to slavery and human trafficking and we expect that view to prevail in our supply chain and contractors. Senior Managers within Newscast Media Group Ltd. are responsible for compliance in their respective departments, insofar as there is perceived to be a risk of encouraging, engaging or sustaining slavery and human trafficking.

### Training

To ensure appropriate levels of risk awareness in respect of modern slavery and human trafficking, we provide training to relevant members of staff and, in particular, to senior Managers in our Procurement Department and our Human Resources Department. All Directors in the business have been briefed on the subject.

### Our effectiveness in combating slavery and human trafficking

We rely upon direct, one-to-one recruitment processes, with subsequent monitoring of performance and the attainment of regulatory standards. We believe our exposure within our human resources to human trafficking and slavery is extremely low.

## 3. The Marketplace

We want to conduct business with companies and people that hold similar values in corporate and social responsibility to ourselves (some of this is detailed in our Purchasing Policy). This does not mean that the people we work for or with, need to have a written policy although we would encourage this. It is important to us and to all stakeholders that our business is sustainable and dependable with a secure future. To achieve this, we shall:

- register and resolve customer, supplier and contractor complaints in accordance with our written procedures;
- ensure a high level of business performance while minimizing and effectively managing risk;
- uphold the values of honesty, partnership and fairness in our relationships with stakeholders;
- clearly set out the agreed terms, conditions and the basis of our relationship within our contracts;
- publish our terms and conditions on our websites;
- always operate in ways that safeguard against unfair business practices;
- encourage our suppliers and contractors to adopt responsible business policies and practices for our mutual benefit; and
- hold certifications and accreditations from various external bodies where our performance and standards are regularly audited. We make the outcome from such audits available to our customers on demand and allow customers to audit our processes and premises by appointment.



# Corporate and Social Responsibility Policy

## 4. Procurement

We want to buy goods from companies that share our standards and commitment to Corporate and Social Responsibility:

- All our suppliers will receive a copy of this policy;
- We will audit our suppliers by questionnaire regularly to ensure minimal compliance.
- We will audit new suppliers by questionnaire within one month of their first use;
- Scores for each supplier will be calculated based on questionnaire returns and our own internal data:

⇒ *Company*

- ◆ Copy of most recent published accounts available on demand
- ◆ H&S incident/ accident statistics current/ previous year
- ◆ Environmental policy available on demand
- ◆ Membership of any known accredited bodies
- ◆ Bribery & anti-corruption policies available on demand
- ◆ Modern slavery and human trafficking policy available on demand
- ◆ Management-/organisation chart available on demand
- ◆ Disaster recovery plan/ risk assessment to supply chain available on demand
- ◆ Acceptance of a commitment to the continuous improvement of labour standards
- ◆ Corporate and Social Responsibility policy available on demand OR agreement to the terms of this Policy

⇒ *Service*

- ◆ Communication/Help- Finance
- ◆ Communication/Help- Procurement
- ◆ Communication/Help- End User
- ◆ Handling of problems
- ◆ Response time to problems
- ◆ Technical assistance



# Corporate and Social Responsibility Policy

## Procurement

### ⇒ Products / our Risk

- ◆ Quality of product - (right first time)
- ◆ Delivery - on time
- ◆ £ our spend
- ◆ No of products supplied and/or product uniqueness
- ◆ Recycling service available
- ◆ Packaging- amount per item
- ◆ Packaging- recycled material used

### ⇒ Sales

- ◆ Product knowledge
- ◆ Communication/help-Sales
- ◆ Sale visits
- ◆ Suppliers not replying to questionnaire will be evaluated for risk based upon our own reasonable assessment of the above criteria.
- ◆ Suppliers engaging with the process will be provided with their scores and the average scores for all our suppliers thereby highlighting room for improvement.



# Corporate and Social Responsibility Policy

## 5. Customers

We want to sell our products and services to customers that share our standards and commitment to Corporate and Social Responsibility. We are a British company and understand that certain territories have trade restrictions imposed on them by the UK foreign office and, or the United Nations.

In addition, in some circumstances we may also choose NOT to trade with:

- Individuals, businesses, Institutes, or territories which are harmful to us or our reputation. We will not form business relationships with organisations that take advantage of modern slavery or human trafficking. All employees can raise concerns with their line manager with regard to working with any particular client. The final decision will require Executive management deliberation and any conclusion not to trade and the reasoning behind it will be explained to the client.

**We will check for UK government (or UN) imposed trade restrictions every twelve months, or when notified by a third party, or upon review of this policy – whichever comes soonest.**

- Individuals, businesses or Institutes that have failed to prove that they can pay for our products or services. This decision will always receive Executive management consideration and notwithstanding this decision we will always make reasonable endeavors' to allow debtors time to settle with us before taking other action.

## 6. Review and continual improvement

- This Policy document will be formally reviewed at least every year (as set in iPassport). Improvements to this policy can be made at any time.
- Actions, disclosures and discoveries as a result of this policy will be formally reviewed annually at the company Annual Management Review which is formally minuted and copies of the minutes stored in the company records.
- The company will expect continual improvement in supplier questionnaire scores. Our expectation levels being set following first issue of the questionnaire. The company will expect a year on year improvement in the average score across all suppliers.