



Spliceteq South Communications Ltd (hereinafter in this document referred to as the Company) seeks to be a good corporate citizen in everything that it does.

We have therefore determined to bring together our existing operating principles into one framework Policy under the heading of Corporate Social Responsibility (CSR). 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 including the United Nations (UN) Universal Declaration of Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, the Guidelines for Multinational Enterprises established by the Organisation for Economic Cooperation and Development (OECD), the Rio Declaration on Environment and Development and the UN Convention against Corruption.

The Board of Directors supports the principles set out in those codes and standards and the aim of this Policy is to translate that support into a set of guidelines and standards that set a common approach for the Company and provide practical guidance for our managers and staff on the ground.

Compliance, monitoring and reporting:

Compliance with this Policy will be continuously monitored and subject to review by the Board of Directors.

Each Manager is responsible for ensuring that the principles set out in this Policy are communicated to, understood and observed by all Staff and for ensuring compliance in their area of responsibility.

Staff who reasonably suspect that there has been a breach of this Policy must report it to their Line Manager, Senior Management, or other mechanisms. We recognise that Staff may be reluctant to report concerns for fear of retaliation and will take disciplinary action against any member of Staff 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 Board of Directors will not criticise management for any loss of business resulting from adherence to the principles set out in this Policy.

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SECTION 1

CODE OF BUSINESS ETHICS

This code applies to all of the operations of the Company and sets out the minimum standards which the Board of Directors expects from Staff in their internal and external dealings with Colleagues, Customers, Stakeholders and third parties.

1.1 Basic Standards of Conduct

- We will conduct every aspect of our business with honesty, integrity and openness, respecting human rights and the interests of our Staff, Customers, Stakeholders and third parties.
- We will respect the legitimate interests of third parties with whom we have dealings with in the course of our business.
- 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 Staff

- The Company is committed to creating and maintaining a safe and healthy working environment for its Staff.
- 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.
- 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 staff.
- We will work towards achieving a diverse workforce, recruiting, employing and promoting Staff only on the basis of objective criteria and the qualifications and abilities needed for the job to be performed.
- We will maintain good communications with our Staff through our information and consultation procedures.
- We will assist our Staff in realising their potential.

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1.3 Customers

- The Company is committed to providing safe, value for money, high quality, and consistent, accessible and reliable services to its customers.

1.4 Shareholders

- The Company will conduct its operations in accordance with the principles of good corporate governance.
- We will provide timely, regular and reliable information on the business to all our shareholders.

1.5 Business Partners and Stakeholders

- We aim to develop strong relationships with our Suppliers, Stakeholders and others with whom we have dealings, based on mutual trust, understanding and respect.
- In those dealings, we expect our partners to adhere to business principles consistent with our own.
- The Company will conduct their operations in accordance with the principles of fair competition and applicable regulations.

1.6 Compliance with Law

- All Staff members of the Company will comply with the laws and regulations applicable wherever they do business. Appropriate training will be provided for Staff as necessary.

1.7 Business Integrity

- The Company shall not offer, give, seek or receive, either directly or indirectly, inducements or other improper advantages for business or financial gain and no member of Staff may offer, give, seek or receive any gift or payment which is, or could be construed as, such. If a Staff member is in any doubt as to whether he or she may accept an offer, that Staff member should discuss the issue with the Managing Director.

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- The Companies accounting and other records and supporting documents must accurately describe and reflect the nature of the underlying transactions.
- No undisclosed or unrecorded account, fund or asset will be established or maintained. The Company will not facilitate, support, tolerate or condone any form of money laundering.

1.8 The Environment

The Company is committed to making continuous improvement in the management of its environmental impact. We will work with our partners to promote environmental care, increase understanding of environmental issues and disseminate good practice.

1.9 Community Involvement

The Company strives to be a good corporate citizen and to fulfil our responsibilities to the societies and communities in which we operate.

1.10 Conflicts of Interest and Confidentiality

Whilst the Company respects the privacy of its Staff, all Staff members are expected to avoid personal activities and financial interests, which could conflict with their responsibilities to the Company. Company members of staff and consultants must not seek gain for themselves or others through misuse of their positions or Company property.

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.

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.

Where information is confidential, that confidentiality must be respected.

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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 “If you cannot do it safely, don’t do it”. We have developed the following high-level health and safety Policy, which underpins all of our operational health and safety policies:

(a) General Statement

The Board of Directors of is committed to ensuring, so far as is reasonably practicable, the health, safety and welfare of all of its employees at work and also the safety of customers and others.

This Policy seeks continuous improvement and compliance with legislation, having proper regard to the protection of people, premises, property and the environment. It is based on the principles that:

- All injuries can be prevented
- The goal is zero injuries
- Safety is the responsibility of all employees
- Working safely is a condition of employment

The Managing Director is tasked to ensure that so far as is reasonably practicable:

- There are adequate arrangements and organisation for health and safety in place within his area of responsibility
- Responsibilities for carrying out these arrangements are clearly allocated
- All staff are given appropriate information, instruction and training
- Adequate supervision is provided to ensure compliance with policies and safe systems of work
- All other legal and statutory duties on health and safety incumbent upon the Company are complied with in all their operations and locations

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- Performance targets are set to achieve a step change in safety performance
- Adequate resources are allocated, and competent persons are appointed to support the achievement of the above objectives.

We will continually monitor the health and safety performance of our operations which will be subjected to periodic safety audits to assess performance. The Managing Director will report to the Board all fatal and notifiable injuries to staff or other persons within 24 hours.

The nine key safety principals with which all staff are required to comply are set out below:

- 1/ Do not endanger yourself or others. Report any hazardous condition or practice that may cause injury to people property or the environment.
- 2/ Obey all rules, signs and instructions. If you do not understand speak to your manager before you start work.
- 3/ Keep your work area clean and tidy. Disorder causes accidents, wastes time, energy and materials.
- 4/ Wear protective clothing and equipment as required. Keep it in good condition, wear it correctly and ask for a replacement if it becomes damaged or unfit for use.
- 5/ All accidents, incidents and near misses must be reported to your manager. Seek immediate help and first aid (if necessary).
- 6/ Do not adjust modify or repair any piece of work equipment unless you are competent and authorised to do so.
- 7/ Use only the correct tools and equipment for the job. Check that they are in good condition before use and use them safely.
- 8/ Before lifting, assess the load and your capability to move it. Make sure you get help with any heavy or awkward items and follow approved techniques.
- 9/ If you have any suggestions to improve safety in your workplace, tell your supervisor or manager.

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We also require contractors to comply with this Policy whilst they are working on our behalf.

2.2 Security

(a) General Statement

Security is a key issue for our clients, our staff and our business. We recognise the range of security issues which can arise and have implemented the following high level security Policy. The Board of Directors is committed to ensuring, so far as is reasonably practicable, the security of our staff at work and our property.

The threats to security are wide ranging, significant and, in the main, driven by external influences. The ability to control risks varies. However, we have the ability to address or mitigate all of the threats which apply. To be successful in this we need the co-operation and engagement of all our staff.

Security is an area in which we seek continuous development and improvement and compliance with existing and emerging legislation. We will heighten the profile of security to ensure all members of staff understand why they should and how they can play their part. We will also work on ways to involve our clients. Our efforts will bring greater personal and corporate security and business benefit.

This statement provides guidance and direction to all employees on what is both required and expected of them. We are confident our staff will appreciate the reasons for this and the benefits to them.

We aim to achieve, so far as is reasonably practicable: -

A secure environment for staff in their work

Security of our property

Security of our systems and processes

We will develop systems to monitor our performance on security within our operations. All operations will be subject to periodic inspection and review.

The Managing Director will provide regular reports on security to the Senior Management Team.

The Company recognises that this security Policy needs to be supported by actions and processes to ensure delivery. The following measures are in place to assist this:

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A security strategy is in place, which underpins our Policy, identifies the key strategic security issues for the business and the approach being taken to address these. This is designed to provide a structure, which allows measurement, review and ongoing refinement.

The importance of security is emphasised to all staff through regular security briefings which provides security advice and guidance and contact details for key personnel.

Staff are actively encouraged to report security concerns.

This approach to security allows us to ensure we have a process to translate our Policy into effective implementation within the organisation. It also allows us to formally recognise and demonstrate our commitment to the need for continuous development and improvement in this important aspect of our business.

We also require contractors to comply with this Policy whilst they are working on our behalf.

SECTION 3

EMPLOYMENT

In formulating its employment policies, the Company is guided by the framework established by the Organisation for Economic Co-operation and Development (OECD) in its Guidelines for Multinational Enterprises. These Guidelines encourage companies to foster openness, sustainability and respect for employee rights. Our employment policies cover all Company staff.

3.1 Equal Opportunities and Diversity Policy

The Board of Directors is committed to equality of opportunity in the provision of services as an employer. This Policy sets out the Companies commitment to treat equally and with fairness at all times its employees, customers, contractors and those who come into contact with the company.

We are committed to seeking continuous improvement and compliance with legislation based on the following principles.

- 1/ Everyone has the right to be treated with dignity and respect.
- 2/ We will not discriminate on the grounds of race, gender, disability, nationality, religion, philosophical belief, political belief, age, sexual orientation, family status, trade union activity or any other factor.

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- 3/ We will adopt fair and inclusive practices throughout our operations and will seek to eliminate all prejudice, discrimination, bullying and harassment.
- 4/ All Employees have a personal responsibility for the practical application of this Policy in their day-today activities and must support the Policy at all times.
- 5/ No-compliance with this Policy will be treated seriously and will not be tolerated.

The Board of Directors are required to ensure:

- 1/ They create a productive and safe working environment, promoting diversity and inclusion in their workforce;
- 2/ They develop new practices, as appropriate, to ensure all employees, contractors and customers are treated fairly; and
- 3/ They can demonstrate continuous improvement in practices to promote diversity and equal opportunities for all.

Legislation and Codes of Practice

We will comply with and exceed where possible, current national and international legislation and relevant codes of practice in the countries where we operate. We will monitor our compliance with this Policy and the requirements of relevant underpinning legislation as appropriate.

Partner Organisations

We are committed to actively working with partner organisations to ensure our policies, procedures and practices are in line with best practice such as the Employers Forum on Disability, Opportunity Now, Race for Opportunity and the National Centre for Diversity.

Practices and Standard Operating Procedures

The Company will put in place practices and standard operating procedures to ensure the commitments in this Policy are applied and implemented throughout the company.

Access to Company Premises

We will take all reasonable steps to ensure that our buildings and premises are accessible to disabled employees, customers and visitors as required by the Disability Discrimination Act (DDA).

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Access to Information

We will seek to ensure that information is made available to our customers and employees in alternative formats as required.

Recruitment

All recruitment will be carried out with regard to fairness, equality and consistency for all candidates at all times. Recruitment practices will be inclusive and we will endeavour to ensure there are no barriers to employment of suitable candidate

Staff Training

We will provide our staff with the necessary guidance and training to ensure the effective implementation of this Policy and to ensure we are an inclusive employer and service provider.

Complaints

Any employee who feels that he or she has grounds for complaint in relation to bullying, discrimination, harassment or victimisation has the right to pursue the complaint through our grievance procedures. Clients and member of the public who feel they have grounds for complaint may pursue these through our company customer complaints procedures. We will ensure our complaints/feedback procedures can be accessed and used by everyone.

Reporting

We are committed to monitoring and reporting on our actions and achievements in relation to implementing this Diversity Policy both internally and externally.

Audit

We are committed to ensuring that our operations comply with the requirements of this Policy and will periodically audit its implementation.

3.2 Human Rights

The Company supports the principles of the United Nations Universal Declaration of

Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work. We will adhere to the following principles in respect of our staff.

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We will treat all employees fairly and honestly, regardless of where they work. All staff will have agreed terms and conditions in accordance with local law or practice and will be given appropriate job skills training.

We will pay a fair wage reflecting local markets and conditions. We will always meet any national minimum wage.

Working hours shall not be excessive. They shall comply with industry guidelines and national standards where they exist.

We will not employ illegal child labour, forced or bonded labour, forced overtime or condone illegal child labour.

Employees have the rights of freedom of association and collective bargaining. We respect the right of our employees to choose whether or not to join a trade union without influence or interference from management. Furthermore, we support the right of our employees to exercise that right through a secret ballot.

We will negotiate in good faith with the properly elected representatives of our employees.

We will abide by the non-discrimination laws in every country where we operate.

We will not use or condone the use of corporal punishment, mental or physical coercion or verbal abuse. We have disciplinary procedures for any member of staff whose conduct falls below the required standard.

We have formal grievance procedures through which staff can raise personal and work-related issues.

All staff will be given reasonable access to bathroom and rest facilities.

3.3 Data Protection

We will comply with the relevant principles governing data protection in each country in which we operate.

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SECTION 4

CUSTOMER AND COMMUNITY

4.1 Customers

The Company wants to lead the way in transforming the way we deliver our services. By aiming for the top in everything that we do, and helping each other, we can deliver the highest levels of safety and service and give greater customer and staff satisfaction. We will share all the success of our Company and reach our destination as the number one utility services provider.

We will:

Act in accordance with fair business, marketing and advertising practices and take all reasonable steps to ensure the safety of our services

Respect the human rights of our clients, employees and supply chain partners

Provide procedures that address customer complaints and contribute to fair and timely resolution of disputes without undue cost or burden

Not make representations or omissions nor engage in any other practices that are deceptive, misleading, fraudulent or unfair

Respect client privacy and provide protection for personal data in accordance with the relevant local law.

4.2 Stakeholders

We are committed to maintaining open and regular dialogue with all our stakeholder groups in matters that affect their interests. These range from formal consultation to regular informal contact on a day-to-day or week-to-week basis.

4.3 Suppliers

Ethical Purchasing Policy

We purchase a wide range of goods and services required in the operation of our business and we also rely heavily on a number of key suppliers for the delivery of our core services. Good working relationships with our suppliers are therefore central to the success of our business. For this reason, we clearly state our purchasing Policy as part of ensuring that our business standards are integrated throughout the supply chain.

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We are committed to obtaining and retaining competitive goods and services while at the same time ensuring they are from sources which have not jeopardised human rights, safety or the environment.

We aim to develop strong relationships with our suppliers, based on mutual trust, understanding and respect.

More specifically we expect our suppliers to:

- 1/ Adhere to business principles consistent with our own.
- 2/ Ensure that their products and services are produced and delivered to comply with all legislation relevant to their business.
- 3/ Seek to maintain continuous improvement in their supply chain relationship with us.
- 4/ Ensure they adopt and implement acceptable safety, environmental, product quality, product stewardship, labour, human rights, social and legal standards in line with our own code and to ensure these issues are acceptably managed within the supply chain for any products supplied to us.

We will seek to work with our key suppliers to:

- 1/ Develop long-term meaningful relations to the benefit of both parties.
- 2/ Improve the quality, environmental performance and sustainability of goods and services where this can be achieved to the benefit of both parties.

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SECTION 5

ENVIRONMENT

5.1 Environmental Policy

Through our core business activities, we are committed to providing good quality, reliable and cost-effective services to all our clients. Our core business strategy is to be the number one service provider in our sector. At the same time, we recognise the environmental impacts arising from our business activities and are committed to reducing these through effective environmental management.

Our Policy is to strive to achieve continual improvement in environmental performance.

We are committed to:

- 1/ Preventing pollution and reducing the overall impact of our operations on the environment.
- 2/ Maintaining an internal management structure for the management of environmental issues which includes clearly defined responsibilities for environmental management capable of delivering this Policy commitment.
- 3/ Complying with, and where possible exceeding applicable legal and other requirements relating to the organisation.
- 4/ Monitoring our environmental performance and setting objectives and targets for improvement.
- 5/ providing appropriate training and awareness programmes for our Staff.

We recognise the key role we must play in both reducing and contributing to greenhouse gas emissions from the surface transport sector. Our commitment in this area is set out in our Climate Change Policy.

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5.2 Climate Change Policy

Climate change has now been recognised as an international issue with governments committed to taking action to reduce greenhouse emissions. As a transport operator we recognise that we emit greenhouse gases from operating our vehicle fleet. At the same time, we have a role in supporting governments and communities to reduce the impacts of climate change from road transport by helping to reduce traffic congestion and air pollution.

We are committed to reducing the greenhouse gas emissions from our operations in a way which supports national government strategies.

Our key climate change commitments are:

- 1/ To assess the potential impact to our business from evolving climate change policies as part of our on-going risk management processes.
- 2/ To work actively with our suppliers to improve the fuel efficiency of our vehicles and plant.
- 3/ To report annually on our greenhouse gas emissions from all vehicles, plant and property in our ownership.
- 4/ To actively promote improved energy efficiency and fuel efficiency within our business.
- 5/ To support research into transport Policy and the use of alternative fuels.
- 6/ To stay abreast of alternative fuel developments and continue to assess their commercial viability.

5.3 Biodiversity Policy

Our Policy in respect of conserving and promoting biodiversity reflects our commitment to furthering the aims of sustainable development in the management and development of our business. All businesses affect biodiversity through the use of resources and discharge of waste products. This Biodiversity Policy is therefore consistent with our broader Environmental Policy, which includes a state commitment to minimise the environmental impacts of our operations and prevent pollution.

Our Policy is to strive to enhance biodiversity where practicable.

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Accordingly, our commitments are:

- 1/ Where we operate from sites which are designated as being of importance due to their natural habitats, we will work with the relevant authorities and affected parties to ensure protection of these habitats through effective pollution control measures and management plans with the aim of conserving or enhancing the biodiversity of these sites.
- 2/ Where we are involved in the development of new sites, we will comply with all relevant statutory requirements and guidelines in respect of designated areas on any of our development sites. Where significant areas of landscaping are proposed, we will aim to promote biodiversity through, for example, sensitivity of planting taking account of any local biodiversity networks or action plans.
- 3/ Where we operate from existing sites the potential to promote biodiversity is likely to be limited. The nature of the operations conducted at our sites is such that they are largely covered in hard standing. We will however seek to identify any sites where the potential exists for enhancing biodiversity and over time develop appropriate actions plans to achieve this.
- 4/ Where we consider it appropriate to do so, we will support the implementation of the UK Biodiversity Action Plan and Local Biodiversity Action Plans defining areas which require special protection and management to ensure that biodiversity is maintained.
- 5/ We will seek to do this in partnership with the relevant authorities and affected parties, who promote biodiversity on a local and national level and seek to identify ways in which we may be able to support the development of selected schemes or initiatives.

Paul Parkinson

Paul Parkinson

CEO

21/06/2024

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