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W.B. SIMPSON & SONS LTD.

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Corporate Social Responsibility Policy

Amendments Date	Version	Summary of changes made:	Changes made by	Approved by
30-04-2014	Original		-	Terry Clare
11-05-2015	Original	None	N/A	Terry Clare
18-04-2016	Original	None	N/A	Terry Clare
11-04-2017	Original	None	N/A	Terry Clare
19-03-2018	Original	None	N/A	Terry Clare
02-04-2019	Original	None	N/A	Terry Clare
10-02-2020	Original	None	N/A	Georgia Shepherd
09-02-2021	Original	None	N/A	Georgia Shepherd
25-01-2022	Original	None	N/A	Georgia Shepherd

C.S.R Policy W.B. Simpson & Sons Ltd (hereafter WBS) believes in conducting business in a manner which achieves sustainable growth whilst demonstrating a high degree of social responsibility. We believe that this approach creates a source of competitive advantage for our business. Demonstrating our commitment to Corporate Social Responsibility is a journey, in the course of which we aim to align our business values, purpose and strategy with the social and economic needs of all our stakeholders, whilst embedding responsible and ethical business policies and practices into everything we do. By working together with all our stakeholders and embracing CSR, WBS opens doors to new markets, opportunities and relationships, increasing competitiveness and profitability and demonstrating our continued commitment to sustainable development and growth.

WBS is committed to the following CSR principles:**Environment**

- The WBS Environmental Management Policy commits us to having good practice procedures to enable the business to adopt the most environmentally appropriate methods and means to support its service delivery.
- These procedures, available through the business management, set specific requirements, describe resulting benefits and provide checklists, examples and supporting material.
- In this way, the business is entirely motivated and organised to implement the procedures in an effective manner.
- WBS regards compliance with relevant environmental legislation and regulations, and the adoption of responsible standards where no legislation exists, as an integral part of its business strategy and is committed to considering the environmental impacts associated with its services throughout the period of the contract and beyond.
- Particular focus is applied to the management of carbon emissions through implementation of our environmental management policy and the consideration of the carbon footprint of procured materials, products and business infrastructure, which is seen as an important aspect of the Company's management in this area.
- WBS is committed to monitoring its environmental performance in line with the construction industry and the Environmental Agency. Environmental aspects (EMS/4.33) are identified at business wide level and corresponding objectives and targets are set to reduce the significance of impacts in those areas. These will be reviewed on at least an annual basis to ensure continual improvement.
- WBS will continue to raise environmental awareness within the Company through the development and training of its employees and will communicate openly and consult with customers, suppliers and other stakeholders on relevant environmental matters.

Health & Safety

- WBS is committed to the safety and the wellbeing of all its staff, customers and stakeholders within the community who may be affected by our activities. In order for us to maintain this commitment, health and safety requirements are implemented, promoted, communicated and managed throughout the company in the same way as all other aspects of our business.
- WBS is committed to, and fully believe that, health and safety is an integral function of its management team and that all managers are accountable for the health and safety performance of their areas of responsibility. To ensure the effective implementation and the subsequent monitoring of this key business aspect, it is necessary to define the duties and accountabilities of all persons responsible for health and safety
- WBS believes that all incidents are preventable and that all risks can be safeguarded. All incidents demand prompt investigation and timely remedial actions when and where appropriate. All employees have responsibilities for health and safety and therefore will be provided with appropriate information, instruction, training and supervision to enable them to work safely and efficiently at customer sites and at our head office.
- That Company safety standards are established and maintained company wide and must therefore be complied with by all sections of the business and that specialist health and safety advice will always be available when and where required.

Workplace

- WBS recognises that people in the workplace are our greatest asset. Policies are therefore directed at creating an environment that will attract, develop, motivate and reward employees of high calibre, taking into account the specific requirements of the business.
- WBS operate an equal opportunities policy for all present and potential future employees. We offer our employees clear and fair terms of employment and provide resources to enable their continual development. We maintain a clear and fair employee remuneration policy and shall maintain forums for employee consultation and business involvement
- WBS provide safeguards to ensure that all our employees are treated with respect and without sexual, physical or mental harassment. We provide, and continually strive to maintain, a clean, healthy and safe working environment.

Community

- WBS values its employees, whose ambitions allow the company and its diverse workforce to meet the challenge of growth. So that all of our employees can realise their full creative potential.
- We regard trust between management and employees as increasingly important. Within our local community we want our people to work in an environment where their contributions are valued and where they can achieve their full potential. We ask all of our employees to tell us what they think of their work organisation and quality, management effectiveness, learning and development, performance and reward, including job satisfaction. We listen to their feedback and make improvements where appropriate.
- WBS actively promote the recruitment of local people from the community. We strive to recruit, train and develop people from the local community from all backgrounds. We also aim, wherever possible, to use local suppliers and tradesman to satisfy outsourced business requirements wherever possible.
- WBS is committed to being an active player in the construction and refurbishment sector. We consider ourselves a credible, open, ethical and conscientious company and we wish to be seen as such by both our internal and external stakeholders. We regard our stakeholders as – employees of the business, customers and clients, investors in our business, general public and local community, suppliers and subcontractors, regulatory authorities, external certification bodies.

Ethics

- WBS employees must conduct the activities for which they are responsible within the scope of their authority and in such a way as to promote and maintain our company reputation and the trust and confidence of those with whom we deal. Compliance in a proper and timely manner with contractual obligations to customers, suppliers and other third parties with whom we have dealings; maintenance of confidentiality and non-disclosure of information; not using confidential information for personal gain; not allowing any conflict of interest.

- All employees shall comply with all legislation forbidding bribery and other corrupt practices, and even where their conduct would not breach such legislation, they do not offer or provide to any public official, customer, intended customer, contractor or fellow employee any gift or form of entertainment which might reasonably be considered excessive.
 - Employees shall not solicit or accept any gift, payment, fee or privilege from any person, company or other organisation which has, or intends or seeks to have, a business relationship with WBS.
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- We seek to minimise any risk of social exploitation within the supply chain,
 - employment is to be freely chosen,
 - child labour shall not be used,
 - there is payment of a living wage,
 - working hours comply with national laws,
 - equal opportunities apply,
 - there is a recognised employment relationship,
 - there is freedom from intimidation,
 - there is a safe and healthy working environment.

Governance

- WBS believes that the concurrent pursuit of efficient management and the proper control of business risks are essential to achieving sustainable improvement in our business values.
- The Directors of WBS place great emphasis on sound governance and are fully compliant with the recommendations of best practice. The Company sets out the framework and principles necessary to ensure appropriate governance and internal controls.
- These controls are applied throughout the business and the purpose of this governance addresses the following;
 - That appropriate management and reporting systems are established to ensure that the Directors, and Senior Management, are appropriately advised of the activities of the business and thereby able to govern the company with complete information
 - That appropriate and proper internal controls are implemented throughout the business to safeguard the Company's assets.

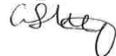
Diversity

- WBS will provide employment equality to all, irrespective of gender, marital or family status; religion or belief; disability; race or ethnic origin; sexual orientation; age; nationality and hours or pattern of work. We operate these policies because we are committed to equality of opportunity and dignity at work for all.
- WBS maintain an inclusive working environment in which differences are acknowledged, accepted, valued and utilised for the benefit of all. Therefore, we set a high value on an individual's contributions and recognise that everyone should be valued as an individual, in their own right.
- WBS supports the recruitment of individuals from all sections of society including those who traditionally have had difficulty to find employment.
- At WBS we recognise the importance of a balance between our employees' contribution to the Company and their life outside of work. To support our employees in achieving a work life balance we ensure that working hours are maintained at a reasonable level and hours worked over the contracted hours is not excessive.

Policy drawn up by:

Georgia
Shepherd

Signature:



Date:

25-01-2022

Approved by:

William
Valler

Signature:



Date:

25-01-2022