

## **CORPORATE SOCIAL RESPONSIBILITY POLICY**

### **STATEMENT OF INTENT**

Midland Fixings Ltd (MIDFIX) is committed to making a positive contribution to society, by acting in a socially responsible and environmentally sustainable way. This policy sets out key areas in which attention can be focused to achieve this aim.

We're committed to developing MIDFIX as a long-term sustainable business by delivering value to all our stakeholders: our customers, workforce, suppliers and the wider community. In order for MIDFIX to be trusted by our stakeholders, all staff must take responsibility for acting with honesty, integrity, professionalism, openness and in compliance with this policy and the law.

It should be noted that this policy touches upon many issues that are detailed in other specific MIDFIX policies i.e. Health & Safety, Anti-Corruption & Bribery, Whistle-blowing, Bullying & Harassment, also our Environmental Statement – this document should therefore be read in conjunction with these.

### **DEFINITION**

#### **1. Responsibilities to the Wider Community**

##### **1.1. Charity Fund-raising**

Making significant charitable donations is a key business aim for MIDFIX.

Annually staff members are invited to nominate and vote for a charity that is meaningful to them. The top 4 are selected to receive donations for 3 months of the coming year. Sums are also kept in reserve to help with humanitarian relief efforts when needed in response to world crises.

Donations for these and other charities are generated in the following ways:

- Lump sums determined by gross profit levels;
- Involvement in national charity events where these have been proposed by a member of staff i.e. MacMillan Coffee Morning;
- Individual sponsorship for involvement in challenges;
- Collection boxes in staff areas and on the Trade Counter.

##### **1.2. Education Liaison**

MIDFIX has a role to play in supporting the development of local young talent. Working with local education providers we assist young people with choosing their future careers, being an advocate for our industry. To this end the Company:

- Has provided a technical apprenticeship for a local school leaver;
- Regularly offers work experience opportunities for local students;

- On a voluntary basis Adrian Fowler, our Managing Director, fulfils the role of Human Resources Director for a group of schools.

## **2. Responsibilities to our Workforce**

### **2.1. Equal Opportunities**

MIDFIX is committed to developing a positive organisational culture, which applies equality and diversity principles in all aspects of its business, including when planning future changes to the business.

MIDFIX will provide equal opportunities in employment and will avoid unlawful discrimination in employment (and also with the selection of suppliers and its provision of products and services to customers). MIDFIX maintains a diverse workforce; recognising the business benefits from employing people of any gender, of all ages, from different cultural backgrounds, with varying beliefs and both physical and mental disabilities.

Equality training is provided to all staff during induction; with ongoing guidance and coaching particularly for those with key responsibilities i.e. for recruitment.

All staffing vacancies are advertised both internally and externally, with all adverts making it clear that MIDFIX is an equal opportunities employer.

### **2.2. Personal Development**

The policy of the Company is to maximise the job satisfaction and performance levels of all staff through the provision of appropriate feedback, training, coaching and mentoring. Training needs are typically identified in our regular 1:1 meetings, including those linked to longer-term career aspirations.

### **2.3. Harassment**

MIDFIX will take any allegations of harassment very seriously and has procedures in place to enable staff to raise complaints. Staff (both the alleged victim and alleged harasser) will be treated in a sensitive manner; allegations will be fully investigated and appropriate action taken where necessary.

### **2.4. Professional Business Relationships**

Staff in a subordinate/managerial relationship are not to exchange favours or gifts which would appear to give rise to some obligation.

In situations where two staff in a subordinate/managerial reporting line are related or are involved in a personal relationship, the managers manager must ensure that all decisions on promotions, privileges, benefits, remuneration, disciplinary matters and grievances for the subordinate employee are conducted by an appropriate managerial colleague. This is to avoid any allegations of unfair or preferential treatment.

## **2.5. Health, Safety and Welfare Factors**

It is our policy to ensure that all reasonably practicable steps are taken to protect our workforce (and also any site visitors or contractors).

In summary the Company will:

- Comply with all applicable legislation, codes of practice and industry standards;
- Maintain Company standards, policies, procedures and work instructions sufficient to avoid injury to workers and others, ensuring that training where required is delivered in a timely way;
- Provide adequate welfare facilities, plant and equipment (including Personal Protective Equipment) and maintain them in a safe condition.
- Recognise the importance of the professional relationship between line managers and staff, as they have primary responsibility for the welfare at work of the staff under their supervision. Managers will respond to staff in a supportive manner taking into account their feelings and difficulties, in an atmosphere of trust and confidentiality. They will provide support and ensure all staff are treated in a fair, sensitive and confidential manner. The Human Resources Department will support managers in this duty of care;
- Select contractors, consultants and suppliers who demonstrate a level of commitment to health, safety and environmental standards commensurate with those of the Company.
- Take reasonable steps to ensure that the actions of workers are not adversely affected by the influence of alcohol and drugs (whether they be prescribed, recreational and/or illegal). All workers have a responsibility to ensure that their own work performance is not impaired as a result of drug or alcohol use. Depending on the individual circumstances, where concerns are highlighted these may be addressed with disciplinary action or support with sourcing external counselling.

## **3. Environmental Responsibilities**

### **3.1. Environmental Factors**

The Company wishes to promote amongst its staff an understanding of environmental and sustainability issues. We aim to conserve energy, water and general resources; as well as minimising waste and the production of hazardous substances/harmful emissions. In support of this aim we:

- are Forest Stewardship Council (FSC) certified which demonstrates that we comply with the highest social and environmental standards on the market - sourcing and supplying wood, paper and other forest products solely from well-managed forests and/or recycled materials;

- only use registered waste carriers and registered waste disposal sites. Documentation shall be held to demonstrate compliance with this. Whenever possible waste shall be recycled, reclaimed or re-used;
- recycle all cardboard, paper, used printer ink cartridges, waste timber and metal;
- re-use or re-sell all used wooden pallets;
- use low wattage or LED lighting in our offices and high efficiency fluorescent lighting in our warehouses;
- ensure that our fleet of delivery vehicles are Euro 6 compliant meeting stringent emissions rules;
- through our purchasing policies seek goods and services, which do least harm to the environment in their production, delivery and packaging use, re-use, recycling and disposal. Seeking to purchase from local or regional suppliers where economically and logistically viable, which helps to maximise the Company's input to the local community and minimise pollution arising from any transportation;
- look for innovative environmentally friendly solutions to customer challenges. An example of this is our Qwikstore range developed for customers working on waste-free building sites, these are loaned mobile units with refillable plastic bins.

### **3.2 FORS**

The Company has achieved the Fleet Operator Recognition Scheme (FORS) Silver accreditation, a voluntary accreditation scheme that promotes exemplary levels of best practice for commercial vehicle operators. FORS has recognised that at MIDFIX we work to standards above the legal minimum in relation to safety, efficiency, and environmental protection including our commitment to measuring, monitoring and improving staff and vehicle performance, including staff training.

## **4. Economic & Financial Responsibilities**

### **4.1. Anti-corruption & Bribery**

The Company considers that bribery and corruption has a detrimental impact on business by undermining good governance and distorting free markets. Transparent, fair conduct helps to foster deeper relationships of trust between the Company and its business partners and clients. It is vital for maintaining the Company's reputation as an ethical and professional business and for securing future growth.

The Company does not tolerate any form of bribery, whether direct or indirect, by, or of, its employees, officers, agents or consultants or any persons or companies acting for it or on its behalf. The Board is committed to implementing and enforcing effective systems throughout the Company to prevent, monitor and eliminate bribery, in accordance with the Bribery Act 2010. Please refer to our Anti-corruption and Bribery Policy for more information.

### **4.2. Money Laundering**

Precautions should be taken to avoid involving the Company in money laundering – these should include watching out for the following 'red flags':

- Cash payments (other than via the Trade Counter);
- Payments through third parties;
- Payments from Cayman Islands, Luxembourg, Channel Islands, Liechtenstein, Eastern Europe;
- Transactions which are inconsistent with a client's trade and business;
- Failure by a client or supplier to provide appropriate identification and/or address.

Any 'red flags' or transactions where a member of staff has reason to believe that money laundering may be taking place must be reported to the Finance Director for further investigation.

#### **4.3. Duty to Inform**

Violations of UK legislation and MIDFIX policy/practice(s) committed by staff, inadvertently or otherwise, if discovered, must be promptly reported through line management who will act on the information appropriately.

Staff are under an obligation to notify the Company immediately if they are charged with an offence which could lead to imprisonment or disqualification from driving and if they are convicted of a criminal offence of any nature (excluding any parking offence).

Staff should refer to the Company's Whistle-Blowing Policy for further information.

#### **4.4. Political Contributions**

Staff shall not on behalf of MIDFIX make political contributions to, or receive from, any political party/committee/officeholder/candidate for any office of the Government of the United Kingdom.

#### **4.5. Conflicts of Interest**

(Save as expressly agreed) staff shall not be involved in any activity, including significant personal investment, which gives rise to a conflict of interest with the company.

#### **4.6. Data Protection**

In the course of carrying out daily tasks staff will come into contact with and use confidential personal information about people, such as names and addresses or information about staff and/or customers' circumstances, families, health and other private matters. Staff must ensure that they do not breach any Data Protection regulations/legislation, which provides strict rules in this area. If there is any doubt about what may or may not be done, advice should be sought from the Head of Admin.