



Ethical Business Policy

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Issue Date: 30/11/2022
Approved By: Michael Gibbons
Managing Director

ASME is committed to operating business ethically and fairly.

Introduction

ASME Engineering provides structural steel services to the UK construction industry. We recognise that the inherent value in delivering a project to time, to budget and to specification is only maximised if the company upholds the highest standards of business ethics, hence we have adopted this policy as part of our commitment to sustainable, responsible business.

Legal Compliance & Trading Ethics

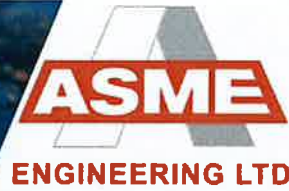
All activities are completed in line with the letter and spirit of UK legislation and the terms of any contract agreed. The company assesses compliance with applicable legislation as a key function of its integrated management system so that its senior management can be assured of our legal compliance.

see our Health & Safety Policy, Environmental Policy, Quality Policy

Prevention of Corrupt Practices

As a point of principle, we are committed to neither offer, accept nor acquiesce to any form of bribery or inducement payment – either domestically or abroad. This includes excess in giving or receiving gifts or hospitality. All customers and suppliers are requested to pass any gifts via the directors to ensure that these are distributed evenly and cannot influence decision making. Procedures and financial record keeping disciplines are implemented to ensure that deviations from this policy will be readily detectable and subject to investigation, disciplinary action and / or reporting to the relevant authorities.

see our Anti-Bribery & Corruption Statement below



Confidentiality & Privileged Information

As a key supplier to support construction projects, we may be privy to information that is confidential or commercially sensitive in itself or by virtue of our early receipt of this information. We are also conscious of the need to prevent individuals securing an advantage from such information (including, but not limited to, trading based on the implications of advanced knowledge). As a principle of good business, the company will observe commercial confidentiality, refrain from unethical use of confidential information or intellectual property and ensure that its employees and partners do the same.

see our Information Security Policy, Privacy Policy, Professional Communication Policy

Human Rights and Workplace Standards

Wherever we employ individuals or work is completed on our behalf, this shall be performed, as a minimum, in conformity with basic workplace principles. All labour shall be through a free and equitable partnership, with the workforce able to earn a living wage in a safe workplace where they are free from discrimination. The company will not tolerate child labour, modern slavery or any unfair limitations on a workforce's freedom of assembly or organisation – either within our activities or our supply chain. Although our workforce and activity makes us at low risk for modern slavery issues, we will work to understand these risks, assure ourselves that they are eliminated throughout our supply chain and diligently support work to eliminate these practices worldwide.

see our Equality & Respect Statement, Modern Slavery Statement below

Community Impact Management

Construction and steel fabrication is, by its nature, a potentially noisy and disruptive activity. For this reason, we include a community impact element to applicable environmental impact assessments and environmental risk assessments. The company is committed to providing appropriate points of contact for communities to raise concerns and to taking an open, active and responsible approach to addressed issues raised.

see our Environmental Policy

Supply Chain Ethics

Where we purchase from suppliers, we shall favour those who share these values and avoid those who contradict these principles. Where we instruct other companies to act on our behalf, they shall not be used as a vehicle to subvert this policy. In pursuit of our community and environmental commitments, preference will be given to those who can demonstrate a positive local impact.

see our Quality Policy, Environmental Policy



1 Implementing These Principles

This policy is implemented as a part of our integrated management system, hence these principles will be embedded in all applicable procedures or working practices that we introduce. They will also be reflected in our decision making and prioritisation.

Improvement, Feedback Whistleblowing

We have provided our staff, suppliers, customers and third parties with effective communication channels to tell us when we do well and how we can do better. At the highest level, I personally offer an open door to anyone with concern about the way my company acts in my name. Negative feedback will always be treated as constructively as possible and attempts to improve our company welcomed. The email address confidential@asmeengineering.co.uk is available to all to raise any matter. Where someone feels that these channels fall short, we will support their right to make a public interest disclosure to a prescribed body and protect and defend their rights in the workplace.

Monitoring & Auditing

The values contained in this policy, and detailed procedures that embody them, shall be subject to regular ongoing monitoring and audit, as would any element of our management system. Where feedback or adverse occurrence investigation indicates that standards in operation have not conformed to these aspirations, action shall be taken to improve performance and prevent a recurrence of the issue.

Signed, on behalf of ASME Engineering Ltd,



Michael Gibbons
Managing Director
30 November 2022



2 Equality & Respect Statement

ASME Engineering recognises that discrimination is not only unlawful, it is also unacceptable and wrong. It will therefore create a work environment that avoids discrimination and welcomes everyone to work without fear of harassment.

Equal Opportunity

The Company's aim is to ensure that no job applicant, employee or other interested party is discriminated against, directly or indirectly, on any unlawful grounds.

By including an equivalent policy in the Employee Handbook, all employees are made aware that the Company will act in accordance with all statutory requirements and take into account any relevant codes of practice. They also know that they have a duty to reflect this approach in their daily behaviour. We expect colleagues, the public and those we work with to be treated fairly and with respect; this must never be directly or indirectly affected by perceived race, gender, identity, age or disability.

All job applicants will be considered solely on their ability to do the job. Interview questions will not be of a discriminatory nature. All promotions will be made on merit in line with the principles of the policy.

Employees or visitors who have a disability (or other needs as a result of a protected characteristic) will receive the necessary help, within reason, to enable them to carry out their normal duties effectively.

This policy will be assessed at regular intervals to ensure that equality of opportunity is afforded to all employees.

Harassment and Intimidating Behaviour

The Company will not tolerate any form of harassment or bullying. Employees must understand the type of behaviour that is totally unacceptable and what solutions are available to employees who may suffer harassment or bullying.

The Company intends to provide a neutral working environment in which no one feels threatened or intimidated.

Harassment is a discriminatory act and is also a criminal offence. It is very difficult to define as it can take many forms, but in the main it takes the form of unwanted behaviour by one employee towards another, for example:

- Patronising or belittling comments.
- Comments about appearance/body/clothes.
- Leering or staring at a person's body.
- Unwelcome sexual invitations or pressure.
- Promises or threats, concerning employment or conditions, in exchange for sexual favours.



- Displaying offensive or sexually explicit material.
- Touching, caressing, hugging or indecent assault.

Please remember the test is that the behaviour is **unwelcome, uninvited** and **unreciprocated**.

Bullying is also difficult to define. Obvious examples are:

- Threats of or actual physical violence.
- Unpleasant or over repeated jokes about a person.
- Unfair or impractical work loading.

Raising Concerns

If you encounter a problem of this nature, it is vital that you make the person responsible aware that his/her remarks or conduct are offensive to you. This should be done in a simple, straightforward way.

It is recognised that complaints of harassment or bullying are often of a sensitive or worrying nature and that it may be difficult to speak directly to the other employee involved. If this is the case, you should put your request in writing and hand it to the harasser or bully.

When or if the informal approach fails or if you believe that the harassment or bullying is of a very serious nature you must bring the matter to the attention of a member of Management. If possible, you should keep notes of the harassment or bullying so that the formal complaint can be investigated, including the date, time and whereabouts of the act.

If you make a formal complaint it will be dealt with under the grievance procedure and all possible actions will be taken to separate you from the alleged harasser or bully.

If you bring a complaint of harassment or bullying you will not be victimised for having brought the complaint. If however after a full investigation, the Company has grounds to believe that the complaint was brought with malicious intent, you will be subject to disciplinary action under the Company's disciplinary procedure.

The Company's appeal procedures apply to appeals against decisions made under the equal opportunities and discrimination policy and the harassment policy.



3 Workplace Conditions Statement (incl. Slavery & Human Trafficking)

ASME Engineering LTD is committed to a safe, healthy workplace where people choose to work as part of an equitable partnership. As such, it fully supports the Modern Slavery Act 2015 and other initiatives to ensure that our values are reflected universally.

ASME is a leading structural steelwork and architectural works fabrication company providing services to its Customers via a thoroughly vetted employment system that encourages diversity and equal opportunity and prevents modern slavery or other forms of exploitative working arrangements.

These standards form part of a wider commitment to operate a safe, environmentally responsible, supportive workplace. Everyone working for us has chosen to be part of our success and benefits from a living wage, safe and fair working hours, and the freedom of communication and assembly to safeguard their own rights. Although these commitments are routine for a UK-based company in our industry, this shall not be a cause of complacency.

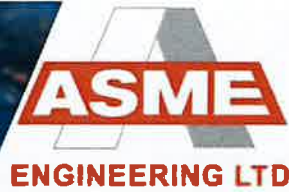
ASME will not support or deal with any business knowingly involved in slavery or human trafficking. We carry out thorough due diligence on all of our major supply chain partners and will - for any new major contractor or supplier - take steps to ensure confirmation of their compliance with the Act and compatibility of values.

Areas of Risk and Actions Taken:

The Company Directors and Senior Management have reviewed the risks of modern slavery and human trafficking within its activities and supply chain.

The assessed risks and resultant actions are:

- The risk of any individual working on behalf of ASME (employee or contractor) being under exploitative conditions or subject to slavery are considered to be very low. The company maintains good dialogue with its workforce, employs in compliance with UK employment law and only uses legitimate agencies and labour contractors to provide personnel. It will ensure that it has direct communication with all workers and only retains workers individually, rather than as part of managed gang or crew.
- The risk of any individual working for an ASME supplier in the UK being under exploitative conditions or subject to slavery is considered to be low. The company makes enquiries as part of supplier approval to confirm the commitment, policies and compliance of its suppliers and will investigate any identified concerns.
- The risk to individuals working overseas within the supply of raw materials (steel products) are considered to be low, but worthy of continued vigilance. ASME is aware that workplace and labour standards may vary in steel mills worldwide –



Ethical Business Policy

however it is considered that conditions are more likely to breach ASMEE policies than meet the definitions of slavery within the Act. To protect against this risk:

- Purchases are made through UK stockholders and enquiries are made of these companies to confirm their policies and controls.
- All steel and other constituent materials are purchased with certificated origin as part of quality control. Although ASMEE does not comment publicly on its sourcing policies, current practices restrict purchases to material of origin from a subset of approved countries. Where there are credible concerns about working conditions in a given country, region or company, this will be used to inform whether or not material is acceptable from that source.
- ASME maintains membership of and involvement in the BCSA who are well placed to advise on concerns in the steel supply chain.

The Company Directors and senior management shall take responsibility for implementing our policy and objectives and shall provide adequate resources (training, etc) and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains.

This statement has been prepared with reference to the government's issued guidance: "Transparency in Supply Chains etc. a Practical Guide" and shall be revised annually, as circumstances change or as significant new guidance is issued. It is publicised to any interested parties in compliance with our contractual and legal obligations. This statement, the actions set out and the policies that underpin our commitment enjoy my full personal support and I shall demand the same of everyone within the company.

This statement has been issued as part of our Ethical Business Policy, a statement of core principles and business ethics which we update regularly and make available on request.



4 Anti-Bribery & Corruption Statement

The Company values its reputation for ethical behaviour and for financial probity and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation.

Its aim therefore is to minimise the risk of unethical behaviour by:

- setting out a clear anti-bribery policy,
- communicating this policy and any relevant procedures to employees and to others who will perform services for the Company,
- undertaking appropriate due diligence measures before engaging others to represent the Company in its business dealings,
- monitoring and reviewing the risks and the effectiveness of any anti-bribery procedures that are in place.

Policy

The Company prohibits the offering, giving, solicitation or acceptance of any bribe (whether cash or other inducement):

- to or from any person or company (wherever they are situated and whether they are a public official or body or private person or company),
- by any individual employee, agent or other person or body acting on behalf of the Company,
- in order to gain any commercial, contractual or regulatory advantage for the Company in a way that is unethical,
- or in order to gain any personal advantage (pecuniary or otherwise) for the individual or anyone connected with the individual.

This policy prohibits any inducement that results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action that may not be solely in the interests of the Company or of the person or body employing them or whom they represent.

This policy is not meant to prohibit normal and appropriate hospitality or the giving of a gift on a festival or at another special time, providing they are customary in a particular market, are proportionate and are properly recorded.

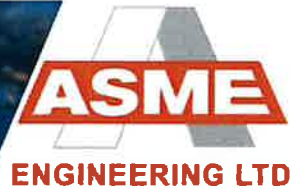
Inevitably, decisions as to what is acceptable may not always be easy. If you are in any doubt as to whether a potential act constitutes bribery, the matter should be referred to a Director before proceeding.

The prevention, detection and reporting of bribery is the responsibility of all employees

Implementing Anti-Bribery & Corruption Controls

The Company is committed to:

- encouraging employees to be vigilant and to report any suspicion of bribery,



Ethical Business Policy

- providing employees with suitable channels of communication and ensuring that sensitive information is treated appropriately,
- investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution,
- taking disciplinary action against any individual(s) involved in bribery.

Reporting Concerns

Any suspicion of bribery should be reported in confidence to the Managing Director, who has overall responsibility for bribery prevention. The email address confidential@asmeengineering.co.uk is provided as an alternative reporting channel for any concerned individual (inside or outside the company).

