

## Social and Ethical Policy

The main operational activity of Smartcomm is in the design, installation, and servicing of home automation and audio-visual systems for residential and commercial properties within the United Kingdom and Europe. The Board at Smartcomm recognises the corporate responsibilities that our customers, staff and other stakeholders rightly expect us to adopt with regard to social and ethical issues. This means ensuring that our facilities, and those of our immediate suppliers, operate to the highest standards, and that we use our influence to ensure that our supply chain meets our strict criteria.

Smartcomm sets in place a set of underlying values on which its business is carried out, those being performance, improvement, innovation, trust and integrity, which guide everything that we do as a business and form the basis of our relationships with all our stakeholders.

Specifically, we have laid down the following social and ethical principles to be followed and implemented across our business operations.

### **Compliance with the Law**

The Company will comply with the laws and regulations that apply to our business activities. Furthermore, we will comply with all Local and International Standards and Codes of Practice/Conduct applicable to our operations. The Company and its employees are required to comply with all competition laws and to promote the conduct of Company operations in accordance with those laws and regulations.

### **Expected Standard of Conduct**

The Company will conduct its operations with honesty, integrity and openness and with respect for the rights and interests of its employees. Smartcomm will similarly respect the legitimate interests of those with whom it has relationships. Smartcomm expects its employees to embrace this standard of conduct and actively demonstrate it through the delivery of their work.

Company employees are expected to preserve property including inventories, fixed assets and intellectual property and properly utilize employee time as far as is reasonable and practicable, only for the legitimate business interests of the Company. Property may not be loaned or disposed of except in accordance with established authorisations.

Bribery, corruption, and Fraud are expressly forbidden and specific arrangements for their prevention are set out in the Bribery, Fraud and Corruption Prevention Policy.

### **Employees, Labour Rights and Conventions**

The Company is committed to maintaining working environments where there is mutual trust and respect and where everyone feels responsible for the performance and reputation of the Company. Labour standards are based on the conventions of the International Labour Organisation (ILO).

The Company respects the dignity of individuals and their legal right to membership of any trade union of their choosing.

Employees will be encouraged to develop their job skills through specialist training and development programmes where appropriate.

### **Recruitment & Resourcing**

Smartcomm will always seek to resource the business based upon the objective assessment of needs and the capability of the individual to meet that requirement. The Company will not use any form of child, forced or compulsory labour and expects similar standards from our Suppliers and Subcontractors, and will comply with the requirements of the Modern Slavery Act 2015 where applicable. The Company will not discriminate on the grounds of age, disability (those who have, or have had, a disability), gender, marital status, maternity or paternity, race, religious belief or sexual orientation, as laid down in the Smartcomm Equal Opportunities Policy.

In compliance with Sections 15 to 25 of the Immigration, Asylum & Nationality Act 2006, Smartcomm will verify the right to work of all employees, and must have obtained original copies of the documents required from Lists 1 and List 2 of the Home Office guidance and confirmed the eligibility of the employee before an offer of employment is made.

All workers including those on a temporary or seasonal contract are issued with a contract containing details of their employment and where possible they shall be part of the local community.

The Company will implement remuneration practices in compliance with legal requirements and will ensure all workers are paid minimum wage or above.

The Company will seek assurance of the competencies and right to work of all agency-supplied labour prior to engagement from the supplying Agency. Working hours will be monitored via weekly timesheets to ensure compliance with EU working hour regulations. Issue of PPE will be subject to contract agreement with the supplying Agency or free of charge to agency staff.

### **Clients**

The Company is committed to providing customers with products, systems and solutions which offer good value in terms of price and quality.

### **Procurement**

The Company is committed to establishing mutually beneficial relations with its suppliers, customers and business partners. Where possible our suppliers and business partners shall be located close to our business with the aim of supporting our local community.

We will communicate with our suppliers to ensure they have environmental performance programmes in place. This shall be assessed as part of the Supplier Approval process.

We endeavour to procure materials produced in a manner that does not use child labour, or any other form of forced or inhumane treatment, and from renewable/sustainable sources whenever

practicable.

Timber is procured according to the Smartcomm Timber Procurement Policy.

The Company will proactively work to ensure that all goods, works and services it procures are sourced ethically, and we will include the fairly traded option in preference to a non-fairly traded one, wherever possible. We will actively avoid sourcing materials or goods from oppressive regimes where human rights maybe impaired

Physical auditing of supply chain and use of Suppliers / Subcontractors questionnaires may be utilised and where available we will seek advice from relevant NGO's regarding:

- Oppressive regimes and regions (risk associated).
- Range of goods sourced from developing countries (ethical supply chain and risk associated).

3

### **Community Involvement**

Smartcomm endeavours to be a trusted member of the community and to fulfil its responsibilities to the society and communities where it carries out its operations consistent with its business objectives and legal obligations. Modest donations to local charities are permitted in accordance with Company guidelines. Any requests for information relating to our activities or any complaints received from the community or other interested parties shall be dealt with by the Managing Director and shall in all instances be taken seriously.

When required we shall consult with affected parties and endeavour to employ constructive two-way communication in order to reduce any negative impact on the community.

Smartcomm supports projects which are consistent with its values. We maintain a list of approved suppliers and will make an effort to source local alternatives in line with project or product specifications.

### **Public Activities**

The Company aims to promote and defend its legitimate business interests. The Company will cooperate with governments and other organizations both directly and indirectly in the development of regulations which may affect our legitimate business interests. The Company neither supports political parties nor contributes to the funds of groups whose activities are calculated to promote party interests. Any political statements made by employees are made in their personal capacity.

### **Health Safety and the Environment**

The Company is committed to protecting its employees, clients, contractors, third parties, and the environment, and making continuous improvements in the management of health, safety and the environment, which are detailed in the Environmental Policy and Health and Safety Policy.

Employees will not be penalized for refusing to work on grounds of Health and Safety. In the event of any conflict or disagreement relating to health and safety this will be escalated up to the Managing Director if necessary, for resolution.

### **Confidentiality**

The Company employees have a duty to protect confidential information and ensure that it is not communicated to the public or external parties, either knowingly or unintentionally. Authority for disclosures of confidential or sensitive information will only be granted with the approval of appropriate management level.

### **Company vehicles**

When purchasing, renting or running motorised vehicles we will assess the environmental impacts of our fleet and aim to minimise their impact on the environment.

### **Communication, Compliance and Reporting**

The Company will communicate these Social and Ethical policies to all management which, in turn, are required to communicate the content to employees under their control.

Management will be required to ensure compliance with this policy each year. The Company expects employees to bring to the attention of the Management any breach or suspected breach of these guiding principles. Employees are allowed to communicate breaches anonymously in confidence and no employee will suffer as a consequence of so doing.

Signed:



**Steven Worrell**  
**Managing Director**  
**07 January 2020**