

ALE Integrated Management System

ALE-IMS-01-HSQE-PLY-007

BUSINESS ETHICS AND CORPORATE SOCIAL RESPONSIBILITY POLICY

1. INTRODUCTION

ALE seeks to be a good corporate citizen in everything that it does.

ALE has therefore determined to bring together its existing operating principles into one framework policy under the heading of Business Ethics and Corporate Social Responsibility (CSR). The principles encompassed in this policy cover all areas of ALE's 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 UN Global Compact Ten Principles and the Bribery Act 2010.

ALE's Executive Board of Directors, ('the Board') supports the policies 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 ALE and provide practical guidance for ALE directors, managers and employees.

2. COMPLIANCE, MONITORING AND REPORTING

The Executive Board of Directors is responsible for the implementation of this policy and will make the necessary resources available to implement ALE corporate responsibilities. The responsibility for ALE adherence to this policy rests with all employees throughout the company.

Employees who reasonably suspect that there has been a breach of this policy must report it to their line manager, senior management. ALE will take disciplinary action against any employee who attempts to discourage or in any way threaten any other employee as a consequence of them reporting or considering reporting a breach or potential breach of this policy.

3. BUSINESS ETHICS

3.1. General Statement

This Code of Business Ethics sets out the standards ALE expects from ALE employees in their internal and external dealings with colleagues, customers, stakeholders and third parties.

3.2. Basic Standards of Conduct

ALE will conduct its business honestly and ethically wherever it operates in the world. ALE will constantly improve the quality of its services, products and operations and will maintain a reputation for honesty, fairness, respect, responsibility, integrity, trust and sound business judgment. No illegal or unethical conduct on the part of officers, directors, employees or affiliates

ALE Integrated Management System

is in the company's best interest. ALE will not compromise its principles for short-term advantage. The ethical performance of ALE is the sum of the ethics of the men and women who work here. All ALE employees are expected to adhere to high standards of personal integrity.

3.3. Personal Conduct

Directors, managers and employees of the company must never permit their personal interests to conflict, or appear to conflict, with the interests of the company, its clients or affiliates. Directors, managers and employees must be particularly careful to avoid representing ALE in any transaction with others with whom they have any outside business affiliation or relationship. Directors, managers and employees shall avoid using their company contacts to advance their private business or personal interests at the expense of the company, its clients or affiliates.

Directors, managers and employees will seek to report all information accurately and honestly, and as otherwise required by applicable reporting requirements.

Employees are expected to protect and not misuse company assets such as buildings, vehicles, equipment, cash and procurement cards.

Employees are expected to use e-mail, internet, IT and telephones in a manner appropriate for business purposes in line with the principles contained in the Global IT Policy.

3.4. Bribery

ALE has a zero tolerance towards bribery and corruption. This policy extends to all of ALE's business dealings in all countries in which it or its subsidiaries or associates operate. All directors, employees and agents of the company are required to comply with this policy.

This applies to transactions with government officials, any private company or person anywhere in the world. It also applies whether the payment is made or received directly or through a third party.

ALE shall ensure that adequate procedures are in place to prevent the risk of bribery and that these are effectively communicated and implemented across ALE in line with the requirements of the UK Bribery Act 2010 and as set out in ALE Anti-Bribery and Corruption Policy ("The ABC and Gifts & Hospitality Policy").

3.5. Gifts, Entertainment and Improper Payments

Accepting or giving any entertainment or gift that is designed to, or may be seen to influence business decisions, is not acceptable. No ALE company, director or employee shall offer, give, seek or receive, either directly or indirectly, inducements or other improper advantages for

ALE Integrated Management System

business or financial gain. If an employee is in any doubt as to whether he or she may accept an offer, that employee should discuss the issue with his or her Branch Manager.

Any gift or hospitality given or received by an employee should be reported for inclusion on the Group or Divisional Gifts and Hospitality Registers, as set out in the Gifts and Hospitality Policy. This applies to any gift or hospitality with an estimated or actual value more than the current level set by the Board.

4. CONFLICTS OF INTEREST

Employees and Directors have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest. This policy establishes only the framework within which ALE wishes the business to operate. The purpose of these guidelines is to provide general direction so that employees can seek further clarification on issues related to the subject of acceptable standards of operation. You should speak to your manager for more information or questions about conflicts of interest.

5. CONFIDENTIALITY

Directors, managers and employees of ALE will often come into contact with, or have possession of, proprietary, confidential or business-sensitive information and must take appropriate steps to ensure that such information is strictly safeguarded.

As part of our business it is possible that certain Directors, officers and employees may come into possession of information not in the public domain relating to ALE clients. This may be deemed to be inside information if it could be price sensitive information in the respect of a company's share price if their shares are publicly traded on a recognised stock market.

Directors, managers and employees will refrain from gathering competitor intelligence by illegitimate means and refrain from acting on knowledge which has been gathered in such a manner. The Directors, managers and employees of ALE will seek to avoid exaggerating or disparaging comparisons of the services and competence of their competitors.

6. POLITICAL ACTIVITY

ALE does not make any donations to political parties or take part in party politics. However, when dealing with Governments ALE does make legitimate concerns known and will seek to influence Governments in relation to issues that could affect ALE, shareholders, customers or the local community. These relationships are conducted in accordance with this Code.

ALE Integrated Management System

7. STAKEHOLDERS

ALE recognises that it must integrate business values and operations to meet the expectations of certain stakeholders. They include customers, employees, regulators, investors, lenders, suppliers, the community and the environment. The social, economic and environmental responsibilities to these stakeholders are integral to the business. ALE takes seriously all feedback received from stakeholders and, where possible, maintains open dialogue to ensure that ALE fulfils the requirements outlined within this policy.

8. SUPPLY CHAIN

ALE purchases a wide range of goods and services required in the operation of general business and there is heavy reliance on a number of key suppliers and subcontractors for the delivery of ALE core services. Good working relationships with suppliers and subcontractors are therefore central to the success of ALE.

Whilst ALE is committed to obtaining and retaining competitive goods and services at the same time ALE seeks to ensure they are from sources that have not jeopardised human rights, safety or the environment.

ALE expects all suppliers to adhere to business principles consistent with ALE's business principles. ALE expects them to adopt and implement acceptable safety, environmental, product quality, product stewardship, labour, human rights, social and legal standards in line with the ALE Purchasing and Supplier Control Procedure.

ALE will seek to work with suppliers to develop long-term meaningful relationships to benefit both parties with the aim of improving the quality, environmental performance and sustainability of goods and services.

The Purchasing and Supplier Control Procedure sets out clear guidelines in the way that ALE expects procurement and supplier management activities to be carried out.

9. HEALTH AND SAFETY

ALE have established, implemented and continuously measure and review a Health and Safety policy that is supported with the arrangements of an Integrated Management System This is made available to all staff and those parties that may have a relevant interest.

This policy and supporting management system is reviewed annually and reissued at least every two years.

ALE Integrated Management System

10. EMPLOYMENT

ALE shall provide safeguards to ensure that all employees are treated with respect and without sexual, physical or mental harassment and strive to maintain, a clean, healthy and safe working environment.

11. RECRUITMENT

All recruitment will be carried out with regard to fairness, equality and consistency for all candidates at all times.

12. STAFF TRAINING

Guidance and training will be provided to all staff with regard to Business Ethical and Corporate Social Responsibility awareness. This policy will be included in the induction training of new staff.

13. HUMAN RIGHTS

ALE supports the principles of the UN Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work, and will adhere to the following principles in respect of ALE staff:

ALE 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.

ALE will pay a fair wage reflecting local markets and conditions, and will always meet any national minimum wage applicable in the country of employment.

Working hours and opt out arrangements shall comply with industry guidelines and national standards where they exist.

Employment must be freely chosen. ALE will not employ illegal child labour, forced or bonded labour, forced overtime or condone illegal child labour.

ALE will negotiate in good faith with any properly elected representatives of ALE employees and will abide by the non-discrimination laws in every country where it operates.

ALE will not use or condone the use of corporal punishment, mental or physical coercion or verbal abuse. ALE has disciplinary procedures which adhere to the current legislation relevant to the country in which the individual is employed.

ALE has formal grievance procedures through which staff can raise personal and work-related issues.

ALE Integrated Management System

14. CUSTOMER AND COMMUNITY

Through effective partnerships, ALE shall continue with initiatives on minimising waste and preventing pollution.

ALE shall encourage dialogue with local communities for mutual benefit, and will register and resolve customer complaints in accordance with ALE published standards of service.

ALE shall support and encourage employees to help local community organisations and activities in the surrounding region.

15. ENVIRONMENTAL

ALE have established, implemented and continuously measure and review a Health and Safety policy that is supported with the arrangements of an Integrated Management System This is made available to all staff and those parties that may have a relevant interest.

This policy and supporting management system is reviewed annually and reissued at least every two years.

None adherence to ALE's Business Ethics and Corporate Social Responsibility Policy by Directors, Officers and Employees could result in disciplinary action being taken which could lead to termination of employment. Directors, Officers and Employees also risk being prosecuted by the relevant authorities if they have broken any country laws. It is important to remember that the consequences of a breach of this policy may be mitigated by voluntary reporting and disclosure.

“Remember that good ethics is good business”

This policy shall be reviewed annually and reissued at least every two years.



Mark Harries – Global Managing Director