

Infocus Resources Limited is a labour supply agency and Infocus Projects Limited a provider of civil engineering project delivery to the railway and other sectors. (Infocus). Our workers include our office-based staff and deployed safety critical staff, civil engineering operatives, machine operatives, and other trades.

Our objectives are to:

- ✓ Maintain and grow the financial performance of the company, through
- ✓ the provision of quality services, and to
- ✓ fulfil our compliance obligations, and to
- ✓ to prevent injury and ill health to individuals, and to
- ✓ ensure environment protection and the prevention of pollution, and to
- ✓ protect the rights and wellbeing of the people involved in our business, and to
- ✓ maintain the good reputation of all our interested parties.

We believe that all businesses and organisations, including this Company, should avoid causing any adverse effect on the human rights of people we deal with, the well-being of society at large, the local and wider environment, and have a positive impact on the financial economy.

As an employer, business partner and member of society we aim to be as ethical as possible recognizing that a sustainable organisation balances of the three pillars of society, economy and environment performance.

We always conduct our own services honestly and honourably, and expect our employees, clients, associates and suppliers to do the same.

Duty for the Health & Safety of Employees and Others

- In regards **occupational health and safety**, we are committed to:
 - ✓ Providing safe and healthy working conditions for the prevention of work-related injury and ill-health.
 - ✓ Fulfilling our legal requirements and other requirements.
 - ✓ Eliminating hazards and reducing occupational health & safety risks as far as is reasonably practicable.
 - ✓ Consulting and involving our workforce in health and safety.
 - ✓ To provide the resources necessary to deliver our OHS obligations and commitments.
 - ✓ To continual improvement of the OHS management system.
 - ✓ To not allowing other business objectives to compromise our health & safety objectives.

To support the delivery of the above commitments we maintain an OHS management system that is in-line with the requirements of ISO 45001:2018 and certified under SSIP and RISQS.

- We ensure that our incident and performance investigations and **capability and disciplinary processes** are done with a philosophy of a **fair culture** outcome.

Duty of Care to the Environment

We are committed to environment protection and to the prevention of pollution, to at least comply with our compliance obligations and to continually improve our environmental performance.

We determine our environmental threats and opportunities. As a labour provider our direct environmental impacts are related to our office and regards our operatives commuting to site.

We ensure that our operatives positively contribute to our clients being **considerate and environmentally safe contractor**.

We constantly look for opportunities for improvement and more environmentally sustainable methods of working. We maintain energy efficient offices, promoting switch off campaigns and minimising resource use by maximising the use of electronic systems. The small quantity of waste we do produce we ensure it is correctly stored, transferred and as far as reasonably practicable recycled.

Whilst we do not directly manage projects on site we will raise the awareness of our direct and deployed staff in the need for effective environmental risk controls. Topics will include resource efficiency and waste minimisation, waste management, pollution prevention, acting as a considerate contractor and nuisance reduction, in minimising damage to habitats and emergency preparedness and response.

We encourage our people to speak out when they identify potential or actual environmental threats or opportunities for improvement.

Equality, Diversity, Harassment and Discrimination

We to ensure **equality** for all workers, job applicants and others affected by our activities and decisions, irrespective of ethnicity, colour, race, nationality or ethnic origin, mental or physical disabilities, age, marital or civil partnership status, actual or perceived sexual orientation, gender or gender re-assignment, pregnancy or maternity, religion or belief.

We recruit **locally** to ensure good life-work balance, and ensure **diversity** in our organisation. We work with **local communities** through local recruitment.

We respect the rights of our workforce to enter into **collective bargaining arrangements and to join trades unions**;

We respect the rights of our workforce to **freedom of speech**.

We do not tolerate any form of **discrimination**, bullying or harassment of our workers or others, by internal or external parties.

We have an established grievance procedure which any employee, supplier or other party can enact where they have a grievance regards unfair treatment.

Social Value

We promote **social value** through local recruitment and charity contribution.

Our workers are our strongest resource. We ensure that our workers are **competent** have the required skills, knowledge, attributes, training and experience (aka SKATE) to fulfil their role to the best of their ability. We maintain training and development processes. As a minimum employees will have the required training to comply with health and safety law and achieve our service related requirements. We encourage all employees attend skills and knowledge development courses.

We regular review the performance of our employees to ensure they are achieving their objectives.

Regards **apprentices**, unfortunately as a labour provider we are required to provide trained experienced and competent staff, we do however invest in the training and development of individuals who show particularly potential to fulfil a higher role.

We ensure that our **capability and disciplinary processes** ensure a fair outcome to employee performance issues.

Fair Pay and Conditions

We ensure **non-exploitation** of employees, workers or suppliers, either regards cost or expectations including working hours and deliverables.

We ensure **fair pay and condition**, providing as a minimum the Living Wage, and ensure that our pay is in line with at least the average for our industry sector.

Employees will be issued fair **written contracts of employment**.

We will comply with the **Working Time Regulations** 1998 as amended 2003 and for Railway Workers the Railways and Other Guided Transport Systems (Railways) Regulations 2006 (known as ROGS). We will not exploit our employees by requiring excessive working hours. No person shall work more than 12 hours per day, 14 hours door-to-door or 72 hours per week, unless with a recorded fatigue risk assessment. No person shall work more than thirteen shifts in every fourteen.

We respect the right of our employees to have **Freedom of Movement**, and to choose to leave the company's employment at any time, whilst meeting their contractual obligation to provide due notice. We however require that employees honour their moral duty not to engage in anti-competitive practices or impact on the reputation of the company by mis-using the knowledge they have on company practices.

Whilst not a large company we recognise our moral duty under the **Modern Slavery Act**. We ensure that employees are treated as per the above. For our supply chain, we only purchase from reputable suppliers and as far as reasonably ensure that our supply chain doesn't include forced labour or child labour.

Customer Contracts

Our contract will usually be in the form of a detailed proposal, including aims, activities, costs, timescales and deliverables. The quality of our service and the value of our support provide the only true basis for continuity. We always try to meet our clients' contractual requirements.

Our fees are always competitive for what we provide. As such we do not generally offer arbitrary discounts; generally, a reduction in price is only enabled by reducing the level or extent of services to be delivered. That said, we always try to propose solutions which accommodate our clients' available budgets and timescales.

We agree our fees and basis of charges clearly in advance, so that we and our clients can plan reliably for what lies ahead, and how it is to be achieved and financially justified.

We do not engage in or tolerate **bribery, corruption, fraud or anti-competitive practices**, and have defined policies on this.

Payment arrangements will be agreed at point of purchase order issue. Ethics is a two way process and we expect our customers to make payments by the date agreed by contract. Our terms are generally net monthly in arrears.

Confidentiality

We are committed to maintaining the highest degree of integrity in all our dealings with potential, current and past employees, clients & suppliers, both in terms of normal commercial confidentiality, and the protection of all personal information received in the course of providing the business services concerned.

We respect the moral and intellectual copyright vested in our clients' intellectual property.

Professional Conduct

We conduct all of our activities professionally and with integrity. We take great care to be completely objective in our judgement and any recommendations that we give, so that issues are never influenced by anything other than the best and proper interests of our clients.

Quality Assurance

We support the concept of Plan-Do-Check-Act. We maintain the quality of what we do through provide competent human resources, compliant and effective plant and good planning, delivery and review processes. We encourage constant ongoing review with our clients, of all aims, activities, outcomes and the cost-effectiveness of every activity. Our Quality Management System is in line with ISO9001:2015.

Financial Management

We ensure sound **financial management** so to continue the sustainability of the business as a local employer and business partner to our customers and supply chain.

Equally we expect our customers to ensure they honour our and their own commitments to payment in full and on time.

We do not engage or tolerate **tax evasion** and have procedures to eliminate this.

Policy Communication

This policy shall be communicated to all interested parties on request.

Policy Review

We will review this policy as part of change planning, post-incident, lessons learnt / knowledge transfer every three years.

Policy Approval

As the person ultimately responsible for compliance in Infocus, I approve this Corporate Responsibility and Ethics policy.



Tim Cole,
Director
04th May 2023