HRP025 - Corporate Social Responsibility Policy

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1. Introduction

Corporate Social Responsibility (CSR) is the concept whereby organisations integrate social and environmental concerns into their business operations and into their interaction with customers, clients and stakeholders on a voluntary basis.

Creative is fully committed to the principle of CSR and intends that CSR should become embedded, where appropriate, into its policies and practices, to the benefit of staff as well as the wider community.

There is already a lot of good work which could be classified as contributing to CSR taking place within the Company and, the policy and future strategy will build on this.

The Company aims to be recognised as an organisation that is transparent and ethical in all its dealings as well as making a positive contribution to the community in which it operates. It is committed to the following core values in all aspects of its work, including the fulfilment of its social responsibility:

- Clear direction and strong leadership
- Customer focus
- Respect for people
- Open communication
- Working to deliver best value
- Openness and transparency
- Equality
- Development of positive working relationships with others
- Commitment to the highest ethical standards of service
- Valuing and harnessing the diversity of staff

2. Corporate Social Responsibilities Strategies

The Company will seek to achieve its Corporate and Social objectives by focusing on three strategic areas:

- 1. Equal Opportunities: Maintaining and promoting our commitment to equal opportunities.
- 2. **Good Relations**: Committing to actions to maintain and improve our relationships with customers, clients and suppliers.
- 3. **Workplace**: Addressing the needs and aspirations of staff through the continuing development of diversity and development opportunities.



3. Background

The Public Interest Disclosure Act 1998 amended the Employment Rights Act 1996 to provide protection for employees who raise legitimate concerns about specified matters. These are called "qualifying disclosures".

A qualifying disclosure is one made in good faith by an employee who has a reasonable belief that any of the following is being, has been, or is likely to be, committed:

- a criminal offence
- a miscarriage of justice
- an act creating risk to health and safety
- an act causing damage to the environment
- a breach of any other legal obligation, or
- concealment of any of the above.

It is not necessary for the employee to have proof that such an act is being, has been, or is likely to be committed - a reasonable belief is sufficient. The employee has no responsibility for investigating the matter - it is the Company's responsibility to ensure that an investigation takes place.

4. Principles

Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Employees should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.

Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially and the outcome of the investigation reported back to the employee who raised the issue.

No employee will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the employee will not be prejudiced because they have raised a legitimate concern.

Victimisation of an employee for raising a qualified disclosure will be a disciplinary offence.

If misconduct is discovered as a result of any investigation under this procedure, the Company's disciplinary procedure will be used, in addition to any appropriate external measures. Maliciously making a false allegation is a disciplinary offence.

An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, the employee should not agree to remain silent. They should report the matter to a director.



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