 Swallow™ SITE SERVICES	SSS-IMS-POL-035 Corporate Social Responsibility Policy	Issue/Revision	1.1
		Date	Dec 2024

SWALLOW SITE SERVICES LIMITED


INTEGRATED MANAGEMENT SYSTEM

SSS-IMS-POL-035

CORPORATE SOCIAL RESPONSIBILITY POLICY

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Introduction

Corporate Social Responsibility (or ESG - Environment, Social & Governance) is about how businesses operate to ensure their activities positively impact the wider community. CSR policies aim to guarantee that companies work ethically, considering human rights and the social, economic, and environmental implications of what they do as a business.

This policy has been broken down into the following sections:

1. Who we are. Our Business and the Supply Chain
2. Ethical working and accountability (Corporate Governance)
3. Human rights and good employment practice
4. Health, safety and wellbeing
5. Societal and environmental impact
6. Our communities
7. The global view and sustainable development goals
8. Target setting, strategies and reporting
9. Endorsement

1. Who we are. Our Business and the Supply Chain.

Established in 2001, Swallow Site Services is a trusted provider of building and maintenance services, delivering tailored, professional solutions to businesses across England & Wales. Our expertise spans multiple sectors, offering comprehensive, fully integrated solutions to property maintenance and asset improvement challenges. With over 20 years of experience, we have evolved from our origins as a specialist contractor in railway property, to become a versatile and reliable partner for businesses of all kinds. We understand that property and the built environment are incredible assets – they are the foundation of modern life - where we live, work, learn, and play. However, we also recognise the financial, legal, social, and sustainability challenges they present. That’s why we aim to deliver reliable, ‘localised’, carbon-neutral services supported by a stable SME platform – nationwide.


We recognise that our activities have an impact on the environment, on people, the communities in which we operate, our customers and supply chain, and the wider society.

This policy aims to capture where we are presently and to help inform a strategy that will enable us to achieve our performance goals by focusing our attention on issues where we believe we can help - by ensuring that we not only cause ‘zero harm’, but also maximise positive impacts to create real added societal value.

In all aspects of our responsibilities, we will work closely with our employees, clients, suppliers and subcontractors, particularly in the areas of:

We will meet – and look to exceed – any relevant legislation, and if legislation does not exist in a particular area, we will ensure we work to recognised best practices and shared values.

We strive for continual improvement, integrating economic, environmental and social considerations into all our decision-making.

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We operate an Integrated Management System (IMS) certified as meeting ISO 9001, ISO 14001 and ISO 45001 by a UKAS accredited body. Our IMS provides the mechanisms to set, measure, and continually improve performance.

2. Ethical Working and Accountability (Corporate Governance)

The starting points of Corporate Governance are in business practices that are accountable, honest, consistent and transparent. Our separate policies and procedures, all forming part of our IMS, are implemented to support these practices, and include:

- Business Ethics Policy (SSS-IMS-POL-006)
- Anti-Fraud, Bribery, and Corruption Policy & Procedure (SSS-IMS-POL-037)
- Whistleblowing Policy (SSS-IMS-POL-027)
- Legal Requirements Procedure (SSS-IMS-PROC-005)
- Evaluation of Compliance Procedure (SSS-IMS-PROC-008)

3. Human Rights and Good Employment Practice

Human rights are relevant to the economic, social and environmental aspects of responsible corporate activity. Swallow Site Services supports and respects the protection of human rights and recognises that part of being a good 'corporate citizen' includes respecting the human rights of those we employ, interact with, or who are affected by/engaged in our operations. We insist that all our suppliers, vendors, and other stakeholders, apply and uphold the same comprehensive standards for human rights as outlined in our policy statements and procedures.


Our Policies are available publicly and communicated internally and externally to our business partners and employees.

Our separate policies and procedures, all forming part of our IMS, are implemented to support these practices, and include:

- Modern Slavery Policy Statement (SSS-IMS-POL-005)
- Prevention of Illegal Working Policy (SSS-IMS-POL-034)
- Equality, Diversity and Inclusion [EDI] Policy (SSS-IMS-POL-010)

We recognise the need to be able to attract, develop and retain employees with the potential, skills and experience necessary for the continued development of our business.

We are committed to equality of opportunity and an inclusive working environment where all employees are treated equally with courtesy, dignity and respect and where everyone feels valued.

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We are committed to creating a learning culture, supporting our people in working to realise their potential and providing opportunities to ensure that our people are equipped with the skills and knowledge to maximise business effectiveness.

Our separate policies and procedures, all forming part of our IMS, are implemented to support these practices, and include:

- Dignity at Work Policy (SSS-IMS-POL-013)
- Stress at Work Policy (SSS-IMS-POL-014)
- Employees' Family Policy (SSS-IMS-POL-016)
- Flexible Working Policy (SSS-IMS-POL-021)
- Working Hours and Fatigue Management Policy (SSS-IMS-POL-029)
- Fairness, Grievance and Disciplinary Policy (SSS-IMS-POL-008)
- Employee Recruitment/Hiring Procedure (SSS-IMS-PROC-021)
- Communications Procedure (SSS-IMS-PROC-014)
- Worker Consultation Procedure (SSS-IMS-PROC-015)

4. Health, Safety and Wellbeing


We will provide safe and healthy workplaces and comply with health and safety rules, regulations and legislation. We are committed to maintaining workplaces that are free from violence, harassment, intimidation and other unsafe, disruptive or hostile conditions due to internal and external factors. We will minimise exposure to potential safety hazards through continually improving training and health and safety performance in all our operations.

We are committed to maintaining and continually improving standards for occupational health and safety for all our employees, subcontractors and those affected by our activities, including the public. We expect the performance of our partners and suppliers to be comparable to ours. We insist that all our suppliers, vendors, and other stakeholders, apply and uphold the same comprehensive standards for occupational health and safety as outlined in our policy statements and procedures.

Our comprehensive IMS has numerous implemented policies and procedures to support these practices, certified to ISO 45001 by an UKAS accredited body, headed by:

- Integrated Management System Policy (Health & Safety, Environmental and Quality SSS-IMS-POL-032)
- Integrated Management System Manual (SSS-IMS-MAN-004)
- Occupational Health Procedure (SSS-IMS-PROC-010)

And supported by our '100-Zero' goal. 100-Zero summarises our goal that, through our fully developed and implemented Integrated Management System, and through continual improvement, our service delivery will be one hundred percent safe, 100% of the time, so that accidents, close calls, and incidents of ill health are eliminated to zero.

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5. Societal and Environmental Impact

We commit to reducing our environmental impact and improving sustainability in all that we do. We will identify and maximise positive impacts and manage and mitigate negative ones in the areas of:

- ✓ Decarbonisation
 - Healthier air
 - Action against climate change
 - Greener transport
 - Smart energy use
 - 'Net zero' by 2050
- ✓ Environmental management
 - Wildlife, habitat and plant protection & biodiversity
 - Zero waste to landfill
 - Sustainable use of materials
 - Promoting the circular economy


Our separate policies and procedures, all forming part of our IMS, are implemented to support these practices, and include:

- Carbon Management Policy Statement (SSS-IMS-POL-004)
- Wastage Policy (SSS-IMS-POL-028)
- Waste Management Procedure (SSS-IMS-PROC-051)
- Management of Wildlife Procedure (SSS-IMS-PROC-052)

6. Our communities

Swallow Site Services considers its role in local communities to be an integral part of the business, and we are proud of the communities we both live and work in, and we will engage with and support local groups, communities and individuals. Our operations will always seek to enhance the community through creating employment for local people in the regions we cover. Our commitment to creating and maintaining employment opportunities for local people contributes to the economic growth and development of their communities, thus maintaining livelihoods and overall quality of life, as well as helping to reduce our carbon emissions by mitigating long-distance travel.

- ✓ Local employment, decent work and economic growth
- ✓ Local supply chain opportunity and usage
- ✓ Education and training
- ✓ Good health and wellbeing
- ✓ Neighbourliness and consideration
- ✓ Charity, sponsorship, volunteering and community work

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7. The Global View and Sustainable Development Goals

Swallow Site Services is committed to doing its part in helping achieve the United Nations Sustainable Development Goals and will carry out periodic materiality and impact assessments against the United Nations Sustainable Development Goals (SDGs).


Our separate policies and procedures, all forming part of our IMS, are implemented to support these practices, and include:

- Sustainable Development Policy (SSS-IMS-POL-036)

In everything we do, we aim to reflect upon and support as many Sustainable Development Goals as may lie within our sphere of influence – remembering always that organisations can positively impact society, regardless of individual size and scope.

THE GLOBAL GOALS For Sustainable Development



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8. Target setting, strategies and reporting

Beginning in 2025, and annually thereafter, Swallow Site Services will publish a CSR Strategy Report.

The Report will be based on established criteria for effective goal-setting and objective development i.e. specific, measurable, assignable, realistic and time-bound objectives (SMART).

The CSR Strategy Report will cover, but will not be limited to, the following Themes, Outcomes and Measures:

- ✓ Effectiveness of business ethics and governance practices
- ✓ Occupational health and safety performance
- ✓ Improving staff wellbeing
- ✓ More local people in employment
- ✓ More opportunities for disadvantaged people
- ✓ Increasing social mobility
- ✓ Improved skills and training for local people
- ✓ Improved employability of young people
- ✓ More opportunities for local SMEs
- ✓ Ethical procurement is promoted
- ✓ A workforce and culture that reflect diversity of the community
- ✓ Social value embedded in the supply chain
- ✓ Creating a greener and healthier community
- ✓ More working in and with the local community, including volunteering
- ✓ Climate impacts are reduced
- ✓ Air pollution is reduced
- ✓ Better places to live and work
- ✓ Sustainable procurement is promoted

6. Endorsement

This statement was approved by:

- James Stroud, Commercial & Compliance Manager
- Mathew Lee, National Contracts Manager
- John Cronin, National Operations Manager
- Rachel Wilkinson, Offices Manager

Signed by

Karl Lawrence
Managing Director



December 2024