

Social Accountability Policy

We want to confirm the importance of creating a work environment that is socially responsible and that favours the professional growth of all employees, in compliance with local and international laws and human rights.

We will ensure that the principles of social accountability are applied by all its English and international suppliers involved in the supply chain of the service, which represents the object of its activities.

For this purpose, both the internal work environment and the supply chain must guarantee the respect of the following requirements based on the United Nations Global Compact 10 Principles (www.unglobalcompact.org):

Human Rights

- Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and
- Principle 2: make sure that they are not complicit in human rights abuses.

Labour Standards

- Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- Principle 4: the elimination of all forms of forced and compulsory labour;
- Principle 5: the effective abolition of child labour; and
- Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment

- Principle 7: Businesses should support a precautionary approach to environmental challenges;
- Principle 8: undertake initiatives to promote greater environmental responsibility; and
- Principle 9: encourage the development and diffusion of environmentally friendly technologies

Anti-Corruption

- Principle 10: Businesses should work against all forms of corruption, including extortion and bribery.
- We believe in fair, free and open markets, and in promoting good government. We do not tolerate, permit, or engage in bribery, corruption, or unethical practices of any kind. Bribery of public officials in the United Kingdom and abroad is illegal under both UK law and the local law of the countries in which we operate. Our policy goes beyond these legal requirements and prohibits corrupt payments in all circumstances, whether in dealings with public officials or individuals in the private sector. Specifically, we prohibit paying, promising, offering, or authorizing a payment, directly, indirectly, or through a third party, money or anything of value to a government official or political party for the purpose of influencing an official act or decision in order to obtain or retain business or secure an improper advantage. The term "government official" includes any person acting in an official capacity for or on behalf of a government or governmental agency or department, including a business with government ownership (for example, a national health service); a public international organisation (for example, the U.N. or World Bank); or a political party or candidate for political office. Even when local practices or customs allow behaviour that breaches our Anti-Corruption Policy; it is not acceptable for us to do so.

- We are committed to complying fully with all applicable money-laundering laws throughout the world. We must comply with all applicable laws prohibiting money laundering. Some countries also have laws related to the reporting of cash or other suspicious transactions that we must obey. Be alert to the following activities:
- The types of payments that have become associated with money laundering, such as: multiple money orders, travellers checks, or large amounts of cash.
- A customer or other third party who is reluctant to provide complete information, provides false or suspicious information, or is anxious to avoid reporting or record-keeping requirements.
- Unusually favourable payment terms or unusual fund transfers to or from foreign countries unrelated to the transaction.
- Structuring a transaction to avoid requirements, such as conducting multiple transactions below the reportable threshold amounts.

Social Accountability Management System

In terms of monitoring and continuous improvement we are committed too:

- Define and constantly update the "Social Accountability Policy" and to apply all the requirements of the Global Compact Principles.
- Provide clear, documented definitions of roles, responsibility, and authority of its personnel.
- Periodically audit the efficiency of this system and take any corrective or preventive necessary actions for continuous improvement.
- Document performance in relation to all the requirements of the standard, by means of appropriate records and communicating the results both in-house and to other social parties involved.
- Ensure that all personnel receive adequate training on the requirement of the standard.
- Select and evaluate suppliers on the basis of their capacity to meet the requirements of the standard
- Plan and implement adequate corrective action when any non-conformity is identified.


In order to ensure that this policy is understood, implemented and maintained at all levels of the company and by all those working with the company, the top management has put into practice the following initiatives:

- Providing a copy of this Policy for perusal by all personnel within the organisation
- Meetings between the Company's Top Management, and Personnel.
- Providing information to stakeholders about the declaration;

We also wish to highlight the importance of its personnel, who play a key role in the continuous improvement in terms of the quality of its objectives, by providing tools and ideas to reach them. All of the above is in accordance with the guiding principle of the company policy, that is: "The quality of the service received by the client depends almost exclusively on the human factor, and not merely on the logic behind the products and technologies used".

Signed 
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