



Title	Corporate Social Responsibility Policy
Process Owner	Management Team
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Approved By	Management Team
Summary	Policy detailing our commitment to corporate social responsibility.
Classification	Public
Standard	QU, ENV
Version	2.0

Change Record

Enter any changes to the document within the tag below...

Addition of detail relating to modern slavery

*Overwrite the content of the tag, this will create each change you have made to the document and record it in ISOportal*

## Corporate Social Responsibility Policy

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### Introduction

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Middleton Asset Management have implemented this policy to ensure that all matters of Corporate Social Responsibility are considered and supported across all areas of our business.

### Detail

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Our policy for Corporate Social Responsibility can be summarised as follows: -

- ❖ Conducting business in a socially responsible and ethical manner
- ❖ Protecting the health and safety of our employees and customers
- ❖ Protecting the environment
- ❖ Supporting human rights and respecting the cultures with which we work.

Middleton Asset Management will ensure that all matters of Corporate Social Responsibility are considered and supported across all areas of our business. We accept that as our business grows then our CSR policy may extend to reflect these changes.

### Business Ethics and Transparency

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Middleton Asset Management is committed to maintaining the highest standards of integrity and embracing best practices in order to maintain excellence in its daily operations. Middleton Asset Management will conduct its business in an open, honest, and ethical manner.

Middleton Asset Management is committed to protecting the health and safety of all individuals affected by our activities, including our employees, customers and the public. Middleton Asset Management will provide a safe and healthy working environment and will not compromise the health and safety of any individual.

### Environment protection

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Middleton Asset Management recognize the importance of protecting the environment and our ethos has always been that recycling is the last resort. We will always aim to refurbish and prolong the life of electronic equipment. We will continue to build on our existing accreditations and ensure that we do all we can to ensure our own business practices continue to exceed environmental legislation at the time.

### Employee Relations

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Middleton Asset Management will ensure that employees are treated fairly and with dignity and consideration for their goals and aspirations and that diversity in the workplace is embraced. Middleton Asset Management is committed to providing equal opportunity in all aspects of employment and will not engage in or tolerate unlawful workplace conduct, including discrimination, intimidation, or harassment.

## **Anti-Bribery**

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It is Middleton Asset Management's policy to conduct business in an honest way, and without the use of any corrupt practices or acts of bribery to obtain an unfair advantage.

We have in place the Anti-bribery and Corruption Policy which details our adherence to the current Bribery Act.

## **Facilitation of Tax Evasion**

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We have a responsibility to adhere to the Corporate Criminal Offence of the Failure to Prevent the Facilitation of Tax Evasion ('CCO'). Therefore, Middleton Asset Management take a zero-tolerance approach to tax evasion; this type of conduct is absolutely prohibited whether committed or facilitated by employees or anyone else acting on Middleton Asset Management's behalf. This legislation makes all persons liable for tax activities not just company owners/Directors. In order to comply with the legislation tax activities have been risk assessed utilising ISOrisk.

Facilitation relates to a person knowingly carrying out dishonest behaviour in relation to tax and can include the following examples: -

- ❖ Allowing waste to bypass a weighbridge on a landfill site
- ❖ Misclassification of waste such that a lower rate of Landfill Tax is fraudulently paid
- ❖ An employee in the Accounts department knowingly processes invoices from a supplier showing a false VAT number

All staff are responsible for carrying out tax activities in an honest manner in accordance with legislation and reporting any issues or potential facilitation of tax evasion to top management as soon as possible. Failure to comply could result in disciplinary action.

## **Modern Slavery**

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Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We are committed to improving our practices to combat slavery and human trafficking.

Middleton Asset Management is committed to social and environmental responsibility and has zero tolerance for slavery and human trafficking. We prohibit the use of forced, bonded (including debt bondage) or indentured labour, involuntary prison labour, slavery, or trafficking of persons in our business and in that of our supply chain. We consider each supplier's conduct in regard to the above when awarding and/or renewing business with the supplier.

As Middleton Asset Management do not meet the criteria as set out in the Modern Slavery Act 2015 to complete a slavery and human trafficking statement the detail set out in this policy acts as a confirmation for customers and suppliers who are required to ensure the integrity of their own supply chains.

## **Responsibility for Anti-Slavery Initiatives**

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We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

To ensure that all parts of our business and supply chain are slavery free we have reviewed our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.

Our workplace policies and procedures demonstrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

All our policies and procedures have been implemented on our ISOportal in adherence with international recognised ISO Standards.

### ***Due Diligence***

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As part of our initiative to identify and mitigate risk we:

- ❖ Maintain a work environment meeting the requirements of our ISO Management System
- ❖ Where possible, longstanding relationships are built with local suppliers and customers clearly detailing expectations of business behaviour
- ❖ Internal assessment of supply chain based supplier performance (e.g. audit and spot check results), and other indicators of supplier-specific risks. Any employees of sub-contractors are checked for their eligibility to work within the UK prior to starting work on site.
- ❖ As we have not sourced products or labour from outside of the UK we feel that we are at a low risk of encountering supply chain members who are involved in slavery or human trafficking but assess each supplier on an individual basis.
- ❖ We ensure the eligibility of our staff to work within the UK as part of our recruitment process. We check their National Insurance number, request photographic ID such as passport or driving licence and a copy of their birth certificate
- ❖ All staff are encouraged to report any concerns to top management
- ❖ All staff are aware of our sustainability and ethical ethos through ISOportal and at induction.
- ❖ Identify and assess potential risks as part of our ISO Risk Assessment Policy utilising ISOrisk

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a Supplier Control Policy.