



# Business Ethics Policy

CSTM Services Ltd believes that it is important for CSTM Services Ltd and its employees to maintain high ethical standards in order to preserve its reputation in the marketplace.

Good ethics are important to ensure that CSTM Services Ltd meets not only its objectives in a fair and equitable manner but its wider social responsibilities externally. In addition, CSTM Services Ltd is committed to ensuring high ethical standards within the workplace.

The procedure that follows provides general guidance on ethics and refers to other policies of CSTM Services Ltd where necessary. The procedure will be closely monitored and will be developed as necessary to ensure that it meets the needs of the CSTM Services Ltd, its employees and its stakeholders.

We will ensure that CSTM Services Ltd is meeting its aims with regard to social impact and ethical behavior and that its stakeholders perceive CSTM Services Ltd in a positive light.

## 1. Procedure

- All employees will be provided with ethics training as part of the induction Programme. Ongoing ethics training, as the ethics policy and procedure develops, will be cascaded to employees via management.
- All employees are required to adhere to the CSTM Services Ltd policy and procedure on business ethics. Employees who breach CSTM Services Ltd policy on business ethics will be subject to disciplinary action up to and including dismissal.
- Employees who are faced with a potential breach of the business ethics code or have doubts about an ethical choice they are facing should, in the first instance, speak to their line manager.
- CSTM Services Ltd has a Code of Conduct which employees are expected to abide by. A copy of the Code of Conduct and other policies relevant to this procedure are available on in the Staff Handbook.
- The following areas are included in this procedure. However, this list is not exhaustive and will be developed as required.
  - Data protection/Access to employee data.
  - Whistleblowing.
  - The giving and receiving of gifts.
  - Confidentiality.
  - Relationships with competitors, suppliers, advertisers, etc.
  - Equal opportunities, discrimination and harassment.
  - Moonlighting.
  - The environment.
- CSTM Services Ltd adhere to the principles relating to Processing of Personal Data set out in the GDPR which require Personal Data to be:
  - Process personal data fairly, lawfully and in a transparent manner.
  - Obtain personal data only for one or more specified and lawful purposes and to ensure that such data is not processed in a manner that is incompatible with the purpose or purposes for which it was obtained.
  - Ensure that personal data is adequate, relevant and not excessive for the purpose or purposes for which it is held.
  - Ensure that personal data is accurate and, where necessary, kept up-to-date.
  - Ensure that personal data is not kept for any longer than is necessary for the purpose for which it was obtained.
  - Ensure that personal data is kept secure.
  - Ensure that personal data is not transferred to a country outside the European Economic Area unless the country to which it is sent ensures an adequate level of protection for the rights (in relation to the information) of the individuals to whom the personal data relates.



CSTM Services Ltd.'s employees should ensure that they understand how data protection impacts on their particular role, in particular with regard to external suppliers and customers. Employees who have any questions on the CSTM Services Ltd.'s Data Protection/Access to Employee Data policy should speak to their manager in the first instance.

- CSTM Services Ltd encourages a free and open culture in its dealings between its officers, employees and all people with whom it engages in business and legal relations. CSTM Services Ltd recognizes that effective and honest communication is essential if malpractice is to be effectively dealt with and CSTM Services Ltd success ensured.
- CSTM Services Ltd does not believe that the giving and receiving of gifts from suppliers and customers is appropriate. In certain circumstances gifts may constitute a bribe. An employee who receives a gift from a customer or supplier, regardless of its value, must inform his or her manager who will decide whether the gift may be kept by the employee or whether it should be returned.
- A confidentiality clause forms part of all employees' statement of particulars/contracts of employment. During the course of employment employees will have access to information of a confidential and sensitive nature. Employees must not disclose to a third party any CSTM Services Ltd confidential information, either during their employment or after their employment has ended. Confidential information includes information on the CSTM Services Ltd present or potential customers or suppliers and any information relating to the CSTM Services Ltd business, including marketing, corporate or financial plans.
- CSTM Services Ltd recognizes that work may result in friendships and closer relationships developing. Relationships may develop not only with colleagues but suppliers and customers. It is natural for relationships to develop in a working environment. While CSTM Services Ltd has every respect for the privacy of its employees, it asks that all employees consider the impact that personal relationships can have on the CSTM Services Ltd.
- CSTM Services Ltd is committed to equality of opportunity and diversity in the workplace. It is the CSTM Services Ltd policy to treat all job applicants and employees fairly and equally, regardless of their sex, trans-gender status, age, sexual orientation, religion or belief, marital status, civil partnership status, race, colour, nationality, national origins, ethnic origin or disability. Furthermore, CSTM Services Ltd will monitor the composition of the workforce and introduce positive action if it appears that this policy is not fully effective. Employees are required to conduct themselves in a way that promotes equal opportunities at all times. Good practice will be promoted by senior management and employees will be provided with relevant training. Employees who feel they have been discriminated against or suffered harassment should speak to a member of management immediately.
- Employees may seek to take up separate employment with another employer or pursue outside business interests while still remaining employed by the CSTM Services Ltd. Although CSTM Services Ltd has no desire to unreasonably restrict an employee's external activities, it must seek to protect its own interests and those of all its employees. Employees will not be permitted to undertake business activities or other work where CSTM Services Ltd considers that this is incompatible with its interests and, in any event, unless employees have obtained prior written authorisation from senior management.
- CSTM Services Ltd is committed to conserving the Earth's resources and to do what it can to reduce any negative effects it has on the environment. Employees are required to use the CSTM Services Ltd equipment and materials wisely and reduce wastage where possible. Employees can play a positive role in helping the environment by recycling all non-confidential waste, using printers and photocopiers with care and switching off electrical equipment which is not in use.

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Signature

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Position

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Date