



'STRIVING FOR EXCELLENCE'

CORPORATE SOCIAL RESPONSIBILITY CHARTER



INVESTORS
IN PEOPLE

Silver
Until 2020



Corporate Social Responsibility Charter

Ref No : ATEC-CSR-001

Owner : MD

Date : 25/06/18

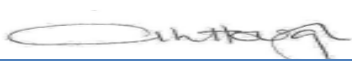
Issue: 3

SHT 1 OF 17

1.0 CHANGE – APPROVAL RECORD

Issue	Status	Date	Comments	
2	Issue	22/08/2017		
3	Issue	01/12/2017	Update accreditation Logo's	
3	Issue	01/10/2018	Reviewed	

APPROVAL RECORD

Author	Name
Bev Abdulla	Bev Abdulla
Approved by Signature	Name
	Andrea Hough

DISTRIBUTION

Name	Location
Master reference [.pdf]	Business Manual/CSR Folder
Word copy	Held within the QC Dept. master documents
Hard Copy Authorisations	None



Corporate Social Responsibility Charter

Ref No : ATEC-CSR-001

Owner : MD

Date : 25/06/18

Issue: 3

SHT 2 OF 17

Contents

1.0 AT Engine Controls, our business in context	2
2.0 AT Engine Controls Core Values.....	6
2.1 Consistency.....	6
2.2 Professionalism	6
2.3 Quality.....	6
3.0 Management Commitment	7
4.0 Focusing on the Customer.....	7
4.1 Social Commitments	10
5.0 Environmental Sustainability and Health and Safety	12
6.0 Accepting gifts	15
6.1 Gifts and overseas travel	16
6.2 Corporate hospitality and entertainment	16
6.3 Recording and disclosing	16
7.0 Responsible Purchasing	17

1.0 AT Engine Controls, our business in context

Consistency, Professionalism, Quality



Corporate Social Responsibility Charter

Ref No : ATEC-CSR-001

Owner : MD

Date : 25/06/18

Issue: 3

SHT 3 OF 17

With roots embedded in Hawker Siddeley Dynamics Engineering (HSDE), at the heart of UK high-tech manufacture, ATEC has a distinguished history we are proud to live up to, formed in August 2004 as part of a management buyout of the Engine Control business from Vosper Thornycroft PLC.

AT Engine Controls (ATEC) are a provider of products and systems for high reliability and safety critical environments, with a yearly turnover of around £6million. We employ a total of 42 people who in the main are based at our Wardley factory. AT Engine Controls (ATEC) started life as part of the Hawker Siddeley Dynamics Engineering (HSDE) group and has been serving the Aviation, Marine and Oil/Gas industries for over 40 years. We work with our customers to keep their critical engineering systems functioning effectively – often considerably beyond the original planned end of life.

AT Engine Controls has been at the forefront of engineering for over 50 years. We are extremely proud of our long-standing heritage and engineering pedigree. Throughout our history, our focus on high-quality engineering solutions has remained constant. Our sustained commitment has seen us develop into a global market leader in the fields of obsolescence management and the development of evolutionary solutions for process and mission critical systems.

We regularly demonstrate our commitment to the customer by exceeding expectations and adding extra value, by working closely with them to understand their wants and needs, along with analysing their account to offer improved efficiencies and potential cost savings. From extending product lifecycles, including but not limited to ATEC own products, to providing extensive support for a whole range of ageing products and technologies, we have a unique experience and expertise.

We are proud of our many long-standing relationships with customers – some extending over our entire history – which continue to prosper today. As a sustainable, profitable, private company with a rich past and secure future, we are committed to extending certainty. Our business is centred on 5 key capabilities:

- Obsolescence Management
- Maintenance, Repair, Overhaul
- Build to Print
- Design & Manufacture
- Testing

In order to meet both our customers and our own exacting standards, we focus across 5 deliverables:

- Safety – Setting strict standards for all of our actions.
- Efficiency – Both in the way we operate and the products and solutions we deliver.
- Security – Understanding our customers need for security and certainty.
- Reliability – Always being on hand to meet customer needs.
- Environmental – Monitoring all our processes to ensure environmentally efficiency.

Any modern technical business cannot function without a solid platform of infrastructure and equipment. We are continually investing to ensure our ability to meet our customer expectations. Further, our investment extends beyond capital to our other critical resource – our people. We are committed to developing our staff and regularly take on both apprentices and trained technicians, design engineers and managers, investing in ongoing training to maintain and enhance their skills.

As an AS9100 accredited business our people are crucial to our performance delivery and we are committed to their development. We are proud to have successfully achieved the “Silver” 6th Generation updated version

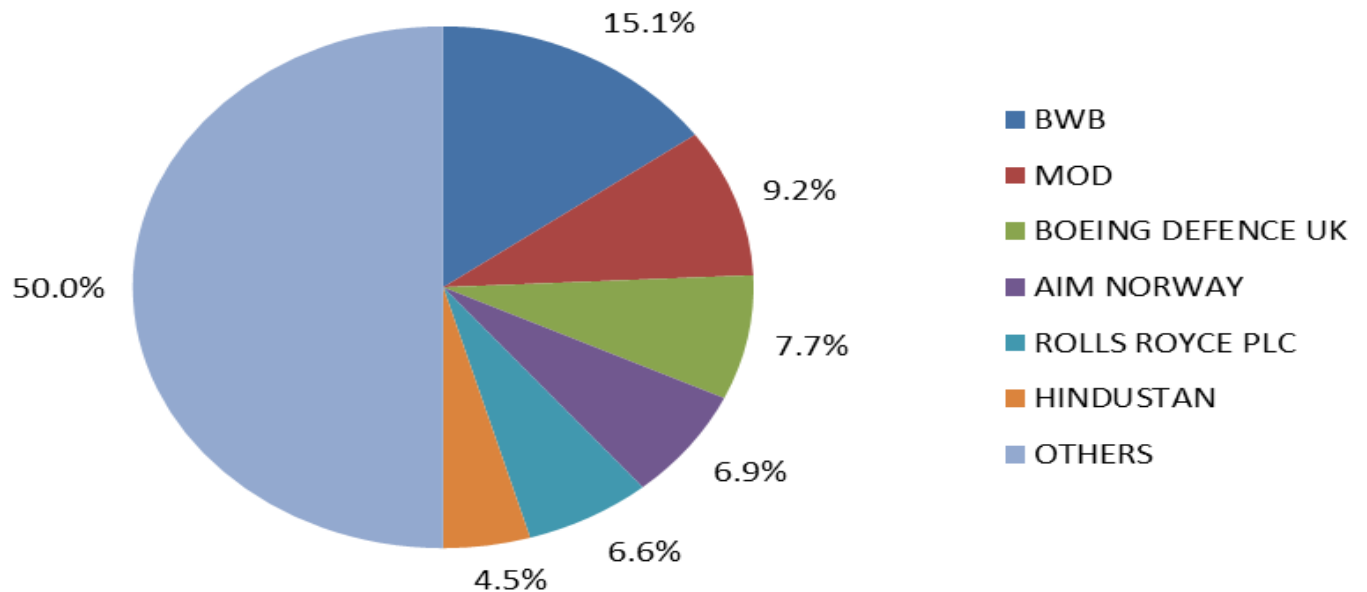
Consistency, Professionalism, Quality

of the Investors in People Standard, joining the top 5 percentile of accredited organisations across the UK.

“Organisations that meet the world recognised Investors in People Standard reflect the very best in people management excellence”.

Customer Base at July 2017

Sales - 12 months to 31 July 2017



Accreditations



INVESTORS
IN PEOPLE

Silver
Until 2020



Managing Directors Statement

Consistency, Professionalism, Quality



We believe that professionalism, consistency and quality form the back bone of the company ethos and we try and apply these core values in everything that we do. Our employees are the primary ambassadors of our values which are driven from the senior management team throughout the business. I trust equally across the board our employees will embrace the Company's CSR charter in decision making and daily practises.

We are committed to the protection of the natural environment by reducing discharge to air, land and water wherever possible and applying the principles of sustainable development whilst maintaining commercial and business effectiveness.

The Company will carry out its operations in accordance with Environmental Legislation and relevant guidance as far as it applicable to the Company's products and services.

We will endeavour to reduce its waste at source by preventing unnecessary use, and to recover, reuse or recycle such waste as it is produced and manage its energy usage in an efficient manner in order to reduce running cost and emissions.

We work with local schools, both primary and secondary, and training organisations to promote engineering and manufacturing amongst today's young people showing them the way in which our sector can improve lives and help the environment through innovation and the use of alternative sustainable materials.

We plan to grow the business by pursuing new markets, new products and possibly acquisitions to move from a £6m business to a £10m business over the next 3 years. We have developed an orbit diagram to plot our growth plans and are working towards acquiring quality, environmental, health & safety and business accreditations to support that growth.



Managing Director O.B.E.



Corporate Social Responsibility Charter

Ref No : ATEC-CSR-001

Owner : MD

Date : 25/06/18

Issue: 3

SHT 6 OF 17

2.0 AT Engine Controls Core Values

Our core values run through our business in everyday working practises and decision making processes. Our core values demonstrate an understanding of what our employees, customer's, regulators, suppliers and local communities require of us (interested Parties). Although customers are of the utmost importance they are not the only interested party who require consideration when conducting our business activities. Our business priorities and core values demonstrate how these groups are interrelated and the importance ATEC Places on these relationships

Our business values influence how we work as an organization. They underpin ATEC business processes and policies: We aim to incorporate to promote and to embed these values within our existing staff and ensure new recruits display a willingness to embrace our culture. We aim to do this by engaging with longer term people and seeking their feedback particularly post our twice yearly Company updates and our yearly appraisal process.

Core Values are underpinned by our strap line ***“Striving for Excellence”***

2.1 Consistency

We deliver a high level of service to both internal and external customers in a consistent manner

- ✓ We mean what we say
- ✓ We operate within Company guidelines in a consistent manner

2.2 Professionalism

At all times we act with professionalism, providing quality service, being reliable and responsible

- ✓ We take pride and ownership in all that we do and say
- ✓ We take responsibility for our own performance, personal accountability is expected

2.3 Quality

Doing the right thing

- ✓ If we give our word we keep it unless otherwise agreed by all parties. We make sure that everything we produce is of a consistently high quality. We choose the best people for our work and employ the best practises.

Continuous Improvement – Aligned to our Core Values; it is the policy of ATEC to create and sustain an environment that encourages the solving of problems, develop cross functional teamwork and involves employees at all levels in the pursuit of continuous improvement.

Consistency, Professionalism, Quality

3.0 Management Commitment

The Senior Management Team encourages all employees to commit themselves to the pursuit of excellence in all aspects of the business. The Senior Management Team endorses the following principles as an approach to achieving quality:

- ✓ ATEC will focus its energies, resources and talents on meeting the needs of our internal and external customers, and in support of that goal, the service needs of each other.
- ✓ ATEC will commit itself to continuous improvement of all its business programs, services and systems through planning and the establishment of specific goals.
- ✓ ATEC will place special emphasis on collaboration through teamwork in the pursuit of quality.
- ✓ ATEC will expect all its employees to participate in the solution of problems and improvement of systems, programs and services, in the belief that quality is everyone's responsibility.
- ✓ ATEC will encourage and support innovation in the belief that contemporary problems require contemporary solutions

4.0 Focusing on the Customer

Customer Care

An organization must recognize, throughout its ranks that the purpose of all work and all efforts to make improvements is to serve the customer better. This means that it must always know how well its' outputs are performing, in the eyes of the customer, through measurement and feedback. The most important customers are the external customers, but the quality chains can break down at any point in the flows of work. Internal customers must therefore, also be well served if the external customers are to be satisfied.

Success hinges on pleasing customers; dissatisfied customers will find other suppliers. Unhappy employees, effectively internal customers, will leave or worst still perform poorly. We must strive to satisfy the needs of both. To this end ATEC will pursue a Customer Care policy by, establishing who our customers are and seeking their perceptions and views of our performance, by taking measures of these, via surveys and analysing the results.

Measures, measurements will be taken, via the surveys, to judge our performance in the following main areas:-

- ✓ Customer's perceptions of his initial contact with ATEC
- ✓ Customer's perceptions of ATEC's bid/tender response

- ✓ Customer's perceptions of us (ATEC)
- ✓ Customer's perceptions of our products
- ✓ Customer's opinions of our sales and after sales performance
- ✓ Customer loyalty

Customer Complaints Policy

ATEC are committed to the objective of becoming our customer's primary partner. An integral part of this is to ensure that customer satisfaction is maintained in the event of a complaint.

Our stated objectives for complaint handling and resolution are:-

- ✓ To respond with courtesy within one working day upon notification of a complaint
- ✓ To provide the customer with an ATEC point of contact regarding the complaint
- ✓ Ensure that the problem is resolved with all urgency in an open and honest manner whilst ensuring that the customer is informed of progress at frequent intervals.
- ✓ Where a complaint cannot be resolved immediately, the customer will be advised of the status of the complaint at regular intervals.
- ✓ We will ensure that the customer does not feel disadvantaged by the handling and outcome of a complaint.
- ✓ To ensure that legal and contractual requirements are followed at all times.
- ✓ To ensure that wherever possible the root cause of the complaint is identified and the appropriate correction, corrective and preventative action is taken to prevent a re-occurrence of the problem.
- ✓ In situations where the root cause of the problem is unclear we will act fairly and work with the customer to resolve the problem to our mutual satisfaction.
- ✓ Offer the customer clear routes to escalate the complaint in the event that they are unsatisfied with the outcome.
- ✓ To measure our performance at senior management level and implement appropriate steps to ensure that the above objectives are fulfilled.



Corporate Social Responsibility Charter

Ref No : ATEC-CSR-001

Owner : MD

Date : 25/06/18

Issue: 3

SHT 9 OF 17

Ensuring that these objectives are met require the support and co-operation of all personnel involved in the complaint handling process. To facilitate this ATEC provides all the resources necessary. Adherence to this policy will ensure that as an organization we are accessible, accountable and seen to operate in a fair and honest manner.

This process is, followed and supported by all levels of the organization. We will monitor our performance and continually strive for 'best in class' performance, ***“striving for excellence”*** Community and CSR

ATEC has been based in Worsley since 1992 and recognises its responsibility towards the local communities where it is located as well as the communities where its staff and their families live.

We believe that employee engagement is a key part of our responsibility to help us both retain our workforce and attract talented new employees. Engaging properly with our employees, their families and our local communities is central to this objective.

Working with Forever Manchester will allow us to achieve this objective in a number of ways.

Forever Manchester is a charity that funds and supports thousands of community projects across Greater Manchester. Over the last 25 years Forever Manchester has delivered over £35million into local communities benefiting 1.1million people. Forever Manchester strengthens communities and enriches local life by inspiring local people to do extraordinary things together. In every neighbourhood across Greater Manchester thousands of people are activity involved in community activities or projects. There are over 20,000 community projects of varying sizes and interest that help support and positively interact with many of the 2.6 million population of Greater Manchester.

Often run on a voluntary basis, these projects require financial and non-financial support to help them deliver activities for the benefit of the wider community.

Individuals also benefit greatly from being involved in community activity. It helps to improve mental and physical well-being, reduces social isolation, develops confidence to try something new and raises aspirations and employability as well as providing an opportunity to meet others.

80% of money raised for charity by the people of Greater Manchester leaves this region. By supporting Forever Manchester we can ensure that money raised will go toward local community initiatives ranging from helping underprivileged and disabled children, elderly and lonely people supporting people with Cancer, Autism and Dementia, sports groups, talent groups, in fact anything that will improve the lives and communities in the places where we all live and work.

Forever Manchester supports over 7,000 community initiatives throughout our region and can also offer us the chance for our employees to visit and volunteer with these groups of people enabling us to see the direct impact of our philanthropic activity.

They can also handle all enquiries regarding charitable donations on our behalf meaning that we will never have to refuse an enquiry.

At ATEC we create positive experiences and environments that enable people and our organization to thrive.

Consistency, Professionalism, Quality



Corporate Social Responsibility Charter

Ref No : ATEC-CSR-001

Owner : MD

Date : 25/06/18

Issue: 3

SHT 10 OF 17

We focus our energy on initiatives that support our diverse workforce; enhance and protect our environment; strengthen our communities; and advance consumer health and wellness. We seek to lead by example and continuously improve in those areas of our business that are under our direct control. We work with clients and suppliers to develop innovative product and service options that operationalise their corporate social responsibility objectives.

We have developed partnerships with local education bodies such as Our Futures and EDT.

We work with Our Futures on practise interview sessions, going into local schools and providing them with constructive feedback on their interview skills. We also take part in the work experience weeks each year taking students in for a week of structured work experience.

EDT, Engineering Development Trust run the Go4SET projects we are actively involved in with local schools. Go4SET links teams of six Year 8/9 (England) and S2 (Scotland) pupils with employers and universities to offer a 10 week Science, Technology, Engineering and Mathematics (STEM) Project.

Work-related learning has a clear positive impact on young people's journey to a successful adulthood and their future economic wellbeing. It helps them connect their learning with the world of work and so prepares them to make a positive contribution to society and the economy and to have lives full of opportunity. We strongly believe the contribution of employers is vital to making work-related learning happen hence we are strong supporters of the initiative.

4.1 Social Commitments

Respect for human rights and labour standards

ATEC is committed to respecting and promoting internationally recognised values and fundamental rights.

The Company seeks to ensure respect for human rights in its business activities. The labour conditions for our staff are decent and comply with applicable local and European legislation.

The Company respects freedom of association and trade union activities for staff and their representatives, in accordance with the applicable labour laws and operate in partnership with UNITE our employee's union of choice.

The Company does not practice or benefit from any form of human trafficking or slavery and is committed to ensuring compliance with the relevant legislation on forced labour. ATEC is committed to driving out acts of modern day slavery and human trafficking within its business and that from within its supply chains, including sub-contractors and partners. The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organization and with its suppliers of goods and services to the organization. These as well as the suppliers of services make up the supply chain within ATEC.

The Company prohibits child labour. Our company do not employ anyone under the minimum age required by the laws of the country in which we operate.

Consistency, Professionalism, Quality



Corporate Social Responsibility Charter

Ref No : ATEC-CSR-001

Owner : MD

Date : 25/06/18

Issue: 3

SHT 11 OF 17

The Company is committed to eradicating any form of discrimination based on sex, age, origin, religion, sexual orientation, physical appearance, state of health, family circumstances, political opinions, pregnancy status, trade union membership or disability, and also any forms of harassment, threats of violence, abuses, coercion or corporal punishment, in line with the Equality Act 2010.

Equal Opportunities

Our intention is to enable all our staff to work in an environment which allows them to fulfil their potential without fear of discrimination or harassment. The Company's commitment to equal opportunities extends to all aspects of the working relationship including:

- ✓ Recruitment and selection procedures
- ✓ Terms of employment, including pay and benefits
- ✓ Training, career development and promotion
- ✓ Work practices, conduct issues, allocation of tasks, discipline and grievances Work related social events
- ✓ Termination of employment and matters after termination, including references

In assessing the requirements for a job, management should ensure that no applicant or employee is placed at a disadvantage as a result of the following protected characteristics:

- ✓ Race
- ✓ Sex
- ✓ Gender reassignment
- ✓ Sexual orientation
- ✓ Marital or civil partnership status
- ✓ Disability
- ✓ Religion or belief
- ✓ Age
- ✓ Pregnancy and maternity

The Company will not tolerate harassment in the workplace for any reason including those protected characteristics detailed above or membership/non membership of a Trade Union. Such conduct is unacceptable and violates our commitment to provide a suitable working environment for all employees. Unwanted conduct which has the purpose or effect of violating the recipient's dignity, unacceptable language or unwanted attention which creates an intimidating, hostile, degrading, humiliating or offensive environment for the recipient is considered harassment. This is not an all-inclusive definition.

Each and every employee has a duty to observe and apply this policy at all times. Violation is a serious offence and in some may be regarded as Gross Misconduct. If you are found to have harassed another employee or condoned harassment you could be the subject of disciplinary action and summary dismissal.

Any employee who believes they have received less favourable treatment on the grounds of any of the protected characteristics or membership/non-membership of a Trade Union is asked to discuss the problem with HR or use the Grievance Procedure



Corporate Social Responsibility Charter

Ref No : ATEC-CSR-001

Owner : MD

Date : 25/06/18

Issue: 3

SHT 12 OF 17

The Company is attentive to the protection of its employees' health, including through membership of insurance schemes, and encourages the implementation of appropriate processes to guarantee health and safety in the workplace. The Company will provide Private Health Insurance affording benefits for the employee, the employee may be required to pay the first £100 of each claim or such other sum as the Company may from time to time deem necessary.

The Company respects the right of staff to receive fair pay, is committed to ensuring decent working hours, and promotes remuneration based on the principle of gender equality.

The Company seeks to be a responsible company and constantly **strives to achieve excellence**. The Company actively involves its staff in its future development and encourages each of them to participate in professional training.

The Company seeks to respect personal privacy and data protection. Individual information is subject to the principle of limited use.

The Company is committed to maintaining the employee handbook and provide regular updated versions which are accessible by all employees.

5.0 Environmental Sustainability and Health and Safety

The Company's Senior Management is firmly convinced that all companies can create value sustainability, while minimising their impact upon the environment.

The Company is firmly committed to ensuring compliance with all national and European environmental legislation and regulations.

The Company encourages environmental management and is working towards compliance with the ISO 14001 standard at its factory in Manchester and is committed to deploying an effective measurement system allowing for continuous improvement.

Environmental Policy

ATEC is committed to the protection of the natural environment by reducing discharges to air, land, and water, wherever possible and applying the principles of Environmental Management whilst maintaining commercial and business effectiveness.

In carrying out their normal functions it is the duty of all those in management to do everything possible to ensure the minimization of risk to the environment.

Overall responsibility for environmental matters in the AT Engine Controls rests with the Managing Director. To achieve these aims ATEC will work towards:

Consistency, Professionalism, Quality

- ✓ Ensuring our discharges to air, land and water arising from our business activities shall be controlled and monitored by applying the principles of the Integrated Pollution Prevention and Control Act (IPPC) as applicable to our products and services.
- ✓ Reducing waste at source by preventing unnecessary use and minimising the amount generated. Where this is not practicable we will endeavour to ensure waste will be recovered, reused or recycled.
- ✓ Managing the consumption of energy in an efficient manner through managers attaching particular regard to the economical use of energy in order to reduce running costs and emissions as an integral and essential part of their overall management.
- ✓ Developing an Environmental Management System in order to pursue continuous improvement in line with our ISO 9001:2008/AS910 ideals in close connection with enforcing authorities, shareholders, neighbours, customers, and all members of our supply chain.
- ✓ Promoting environmental awareness through effective education and training.

We will regularly measure and monitor our system and set key performance figures. This data will be used to set environmental targets and establish improvement goals.

By advancing these aims we will contribute to handing down to future generations a natural wealth which includes clean and adequate water supplies, clean air, wildlife, and wilderness and maintains the richest possible bio-diversity.

We have a waste control plan that aims to follow the principles of the “Waste Hierarchy” i.e.:

- ✓ **Eliminate** waste where possible
- ✓ **Reduce** the amount of waste produced
- ✓ **Reuse** wherever possible
- ✓ **Recycle** after use
- ✓ **Dispose** of the remaining in a responsible manner

The Company's staff work to facilitate the implementation of ever more environmentally friendly technologies, innovation processes and organizational systems, to this end 2016 saw the purchase of an updated flow solder machine for the shop-floor that is lead free.

The Company's senior management implements a health and safety policy for staff, an environmental policy and employees are actively involved as Safety Representatives.

Health & Safety Policy ATEC-PLY-011



Corporate Social Responsibility Charter

Ref No : ATEC-CSR-001

Owner : MD

Date : 25/06/18

Issue: 3

SHT 14 OF 17

ATEC sets great importance on the Health and Safety of its employees whilst they are at work, considering this to be a Management responsibility ranking with such matters as production, quality and cost. The operations of the Company shall be carried out in accordance with relevant statutory Health and Safety legislation and codes of practice. Provision of information, instruction, training and supervision will be provided to ensure this end and that the health, safety and welfare of employees is not compromised.

When work is required to be sub-contracted away from Company premises, every reasonable effort shall be made to utilise services of like-minded companies and consideration will be made of their health and safety performance. Adequate arrangements for dealing with emergencies shall be maintained, but the avoidance of such incidents is a prime consideration. The Company will take all reasonable steps to maintain a safe and healthy place of work for employees, whether they are working at or remote from the Company premises. This will be achieved by process of risk assessment implementing effective controls to reduce risk where reasonably practicable.

The Company will consult on all matters affecting the safety of employees. This is achieved via site Health and Safety Committee and Joint Consultative Committee (JCC) meetings.

The Company is keen to ensure that its business partners adopt a responsible approach to the environment and share its goals and values.

The Company is committed to maintaining a Health and Safety committee which includes employees and union representation and continuing to provide training to all employees.

ATEC are accredited to the BS OHSAS 18001 standard (the top UK standard for Health and Safety practises).

Business Ethics *(aligned to Bribery Act 2010)*

Our policy is intended to define the Management's values and the key principles applied in our development.

It lays down the fundamental rules which govern our behaviour enabling us to act in a more appropriate way.

It calls upon everyone to ensure compliance with our business ethics expressed in the form of the following:

Gifts and corporate hospitality

The purpose of this policy is to set out our rules on the giving and receiving of gifts and corporate hospitality in order to protect our reputation and ensure that we operate both lawfully and ethically. (Ref: Bribery Act 2010 – to be updated July 2011)

This policy applies to all employees, consultants and agents.

Offering gifts

You are allowed to offer modest non-cash gifts to business partners where appropriate for marketing purposes or, as long as the gift is occasional and not regular or repeated, other purposes such as expressing thanks or making a goodwill gesture. For example, we may offer promotional material such as pens; calendars etc. for marketing purposes or send a small token gift to a business partner as a Christmas gift.

Consistency, Professionalism, Quality

If you want to offer a gift, other than agreed promotional material you must obtain prior approval from the Managing Director who will decide if the proposed gift is legitimate, proportionate and reasonable.

You should never offer:

- × Cash gifts;
- × Any sort of gift where the intention is to influence the recipient's judgment;
- × Any sort of gift where you know that the recipient is not allowed to receive it.

6.0 Accepting gifts

You are allowed to accept token gifts from business partners or potential business partners where this constitutes legitimate and reasonable marketing or where it is a legitimate goodwill gesture. For example, you can accept promotional items such as desk calendars or pens or occasional gestures such as a bunch of flowers from a customer to express thanks or offer congratulations.

You should never accept:

- × Cash gifts; or
- × Gifts which are extravagant/out of proportion with the value of the business relationship or worth more than a nominal amount; or
- × repeated/regular gifts from the same donor; or
- × any sort of gift where your judgment might reasonably be thought to be at risk of influence as a result of the gift (for example, a gift from a potential business partner shortly before you make a decision over whether or not to award them a contract); or
- × Any sort of gift which might reasonably bring the business into disrepute or be contrary to terms or the spirit of our equal opportunities/dignity at work policy, for example a pin-up calendar.

All gifts received should be handed into the HR Manager for inclusion in the Company Christmas or Charity draw.

Be aware that a 'gift' includes food, drink and other corporate hospitality if the host is not present. For example, if you are invited to attend a test match at Lords by one of our suppliers but the supplier will not be present then the tickets are a gift.

If you are offered a gift in circumstances which make you concerned or uncomfortable then you should raise this with the Managing Director. It is our policy and your responsibility to act ethically at all times.

If any unauthorised gift is offered to you then you should decline it politely explaining that our policy does not permit you to accept it, unless to do so would be embarrassing or insulting (for example because the gift is offered in public) in which case you should accept the gift and then refer the situation to the Managing Director. The company is likely to write to the donor of the gift explaining our policy and returning the item.

6.1 Gifts and overseas travel

If you are travelling overseas on business to an area where gifts are an important part of business culture then you will be allowed and expected to participate in gift giving and receiving but this still needs to be proportionate and reasonable from a UK perspective. You should seek guidance from the Managing Director.

6.2 Corporate hospitality and entertainment

Our policy is to participate in corporate hospitality and entertainment where this will promote good relationships with our business partners.

In addition, working lunches with business partners are appropriate, as long as they are reasonable/modest/in line with our expenses policy.

However, corporate hospitality and entertainment, including attendance at dinners or sporting events, should not be offered or accepted if:

- × It is on a scale which is disproportionate to the legitimate business value of the relationship; or
- × You are offering it with the intention of influencing the recipient's judgment or when you know they are not permitted to accept it; or
- × You are offered it in circumstances when acceptance would influence your business judgment or put you in a difficult position, for example being offered Wimbledon tickets by a supplier shortly before their contract came up for renewal; or
- × If it would infringe our expenses policy; or
- × If it might reasonably bring the business into disrepute or contravene the terms or the spirit of our equal opportunities/dignity at work policy, for example a post-meal visit to a 'gentleman's club'.

If you are unsure as to whether a particular invitation is appropriate, you should seek guidance from the HR Business Partner or the Managing Director

6.3 Recording and disclosing

All gifts received should be handed into the HR Business Partner for inclusion in the Company Christmas or Charity draw with the exclusion of minor marketing material such as pens, calendars etc.

All invitations to corporate hospitality should be recorded with your Manager prior to accepting any invitation.

Any breaches of this policy will be dealt with through the Company's formal disciplinary process and will be deemed gross misconduct

7.0 Responsible Purchasing

Code of Conduct for Business Relations

The Company is conscious of the many challenges and opportunities for progress which can present themselves in the supply chain.

With this in mind, we have drafted a series of guidelines to encourage responsible behaviour on the part of its business partners.

The Code of Conduct for Business Relations illustrates the commitments we expect from our business partners:

- ✓ Compliance with national and international laws and regulations
- ✓ Respect for human rights as part of the business relationship
- ✓ Guaranteeing the confidential nature of information
- ✓ Avoiding any conflict of interest
- ✓ Combating anti-competitive practices
- ✓ Respect for the environment
- ✓ A commitment to responsible purchasing – Minerals originating from conflict zones and in line with REACH regulations

As part of the companies due diligence processes into slavery and human trafficking the supplier approval process will incorporate a review of the controls undertaken by the supplier. Imported goods from sources outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored.

The Company Directors and Senior Management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources (training etc.) and investment to ensure that slavery and human trafficking is not taking place within the organization and within its supply chains.

ATEC also invites its business partners to ensure that their own business partners are made aware of and comply with the CSR principles described in this code of conduct.