

CORPORATE SOCIAL RESPONSIBILITY (CSR)

This code applies to all of the operations of DOC Cleaning Limited and sets out the minimum standards which the board expects from staff in their internal and external dealings with colleagues, customers and third parties.

1. BASIC STANDARDS OF CONDUCT

We will conduct every aspect of our business with honesty, integrity and openness; respecting human rights and the interest of our employees, customers and third parties. We will respect the legitimate interests of third parties with whom we have dealings in the course of our business. We will maintain the highest standards of integrity, for example, we will not promise more than we can reasonably deliver to make commitments we cannot or not intend to keep.

2. EMPLOYEES

DOC Cleaning Limited is committed to creating and maintaining a safe and healthy working environment for its employees. Therefore, the company –

- Will strive to create a workplace in which there is mutual trust and respect and where every person feels responsible for the performance and reputation of our company;
- Will respect the individual and each other's rights, customs and traditions, including the right of freedom of association and the right to decide whether or not to join a trade union;
- Will work towards achieving a diverse workforce, recruiting, employing and promoting employees only on the basis of objective criteria and the qualifications and abilities needed for the job to be performed;
- Will maintain good communications with employees through our information and consultation procedures;
- Will assist employees in realising their potential.

3. CUSTOMERS

DOC Cleaning Limited is committed to providing a safe, value for money, high quality, consistent, accessible and reliable service to all its customers.

4. BUSINESS PARTNERS

- We aim to develop strong relationships with our suppliers and others with whom we have dealings, based on mutual trust, understanding and respect;
- In those dealings, we expect our partners to adhere to business principles consistent with our own.

DOC Cleaning Limited will conduct their operations in accordance with the principles of fair competition and applicable regulations.

5. COMPLIANCE WITH LAW

All members of the company will comply with the laws and regulations applicable wherever they do business. Appropriate training will be provided for employees as necessary.

6. BUSINESS INTEGRITY

- DOC Cleaning Limited shall not offer, give, seek or receive, either directly or indirectly, inducements or other improper advantages for business or financial gain and no employee may offer, give, seek or receive any gift or payment which is, or could be construed as such. If an employee is in any doubt as to whether he or she may accept an offer, that employee should discuss the issue with his or her Manager or Director;
- DOC Cleaning Limited accounting and other records and supporting documents must accurately describe and reflect the nature of the underlying transactions;
- No undisclosed or unrecorded account, fund or asset will be established or maintained;
- DOC Cleaning Limited will not facilitate, support, tolerate or condone any form of money laundering.

7. THE ENVIRONMENT

- DOC Cleaning is committed to making continuous improvements in the management of its environmental impact;
- We will work with our partners to promote environmental care, increase understanding of environmental issues and disseminate good practice.

8. COMMUNITY INVOLVEMENT

DOC Cleaning Limited strives to be a good corporate citizen and to fulfil our responsibilities to the societies and communities in which we operate.

9. CONFLICTS OF INTEREST AND CONFIDENTIALITY

- Whilst DOC Cleaning Limited respects the privacy of its employees, all employees are expected to avoid personal activities and financial interests, which could conflict with their responsibilities to the company;
- Information received by anyone in the course of his or her employment must not be used for personal gain or for any purpose other than that for which it was given;
- Where information is private, confidentiality must be respected.

10. SAFETY

- The health and safety of our employees and customers is our paramount concern. Safety underpins all our operations;
- We have developed high-level health and safety policies.

GENERAL STATEMENT

The Board of Directors at DOC Cleaning Limited are committed to ensuring, as far as possible, the health, safety and welfare of all of its employees at work and also the safety of customers and others.

This policy seeks continuous improvement and compliance with legislation, having proper regard to the protection of people, premises, property and the environment. It is based on the principles that:

- All injuries can be prevented;
- The goal is zero injuries;
- Safety is the responsibility of all employees;
- Working safely is a condition of employment;
- The Managing Director and nominated directors are tasked to ensure that as far as possible, there are adequate arrangements and organisation for health and safety in place within their area of responsibility;
- Responsibilities for carrying out these arrangements are clearly allocated;
- All staff are given appropriate information, instructions and training;
- Adequate supervision is provided to ensure compliance with policies and safe systems of work;
- All other legal and statutory duties on health and safety upon DOC Cleaning Limited are complied within all their operations and locations;
- Performance targets are set to achieve a step change in safety performance;
- Adequate resources are allocated and competent persons are appointed to support the achievement of the above objectives.

We will continually monitor the health and safety performance of our operations which will be subjected to periodic safety audits to assess performance. The nominated directors will:

- Present a six monthly report on health and safety to the Executive Safety Committee;
- Report to the board all fatal and notifiable injuries to staff or other persons within 24 hours.
- The key safety principles with which all DOC Cleaning employees are required to comply are set out below:
 - Do not endanger yourself or others;
 - Report any hazardous conditions or practice that may cause injury to people, property or the environment;
 - Obey all rules, signs and instructions;
 - If you do not understand, speak to your Manager before you start work;
 - Keep your work area clean and tidy;
 - Disorder causes accidents, wastes time, energy and materials;
 - Wear protective clothing and equipment as required;
 - Keep it in good condition, wear it correctly and ask for a replacement if it becomes damaged or unfit for use;
 - All accidents, incidents and near misses must be reported to your Line Manager;
 - Seek immediate help and First Aid, if necessary;
 - Do not adjust, modify or repair any piece of work equipment, unless you are competent and authorised to do so;
 - Use only the correct tools and equipment for the job;
 - Check that they are in good condition before use and use them safely;
 - Before lifting, assess the load and your capability to move it;
 - Make sure you get help with any heavy or awkward items and follow approved techniques.

If you have any suggestions to improve safety in your workplace, tell your Supervisor or Manager. We also require contractors to comply with this policy whilst they are working at our premises.

11. SECURITY

GENERAL STATEMENT

Security is a key issue for our staff and our business. We recognise the range of security issues which can arise and have implemented the following high level security policy.

The Board of Directors at DOC Cleaning Limited are committed to ensuring the security of our employees at work and our property. The threats to security are wide ranging, significant and, in the main, driven by external influences. The ability to control risks varies. However, we have the ability to address or mitigate all of the threats which apply. To be successful in this we need the co-operation and engagement of all staff and customers.

Security is an area in which we seek continuous development, improvement and compliance with existing and emerging legislation. We will heighten the profile of security to ensure all members of

staff understand why they should play their part and how to do this. Our efforts will bring greater personal and corporate security and business benefit.

This statement provides guidance and direction to all employees on what is both required and expected of them. We are confident our staff will appreciate the reasons for this and the benefits to them, their colleagues and our property.

We aim to achieve:

- A secure environment for customers using our services;
- A secure environment for staff in their work;
- Security of our property;
- Security of our systems and processes.

We will develop systems to monitor our performance on security within our operations. All operations will be subject to periodic inspection and review. DOC Cleaning Limited recognises that this security policy needs to be supported by actions and processes to ensure delivery. The following measures are in place to assist this:

- A security strategy is in place, which underpins our policy, identifies the key strategic security issues for the business and the approach being taken to address these. This is designed to provide a structure, which allows measurement, review and ongoing refinement;
- The importance of security is emphasised to all staff through regular security briefings and a 'Security' section has been created on our system. This provides security advice and guidance and contact details for key security personnel. It also ensures our security specialists can be accessed by all our staff when they are needed;
- Staff are actively encouraged to report security concerns. To support this there is a confidential telephone reporting system which allows staff to anonymously report their concerns;
- This approach to security allows us to ensure we have a process to translate our policy into effective implementation within the organisation. It also allows us to formally recognise and demonstrate our commitment to the need for continuous development and improvement in this important aspect of our business.

We also require contractors to comply with this policy whilst they are working at our premises.

12. EQUAL OPPORTUNITIES POLICY

The Board of the Directors of DOC Cleaning Limited are committed to equality of opportunity both in the provision of services to the customer and as an employer. This policy sets out DOC Cleaning Limited's commitment to treat equally and with fairness at all times its employees, customers, contractors and those who come onto contact with the company.

We are committed to seeking continuous improvement and compliance with legislation based on the following principles: -

- Everyone has the right to be treated with dignity and respect;
- We will not discriminate on any level;
- We will adopt fair and inclusive practices throughout our operations and will seek to eliminate all prejudice, discrimination, bullying and harassment;
- All employees have a personal responsibility for the practical application of this policy in their day-to-day activities and must support the policy at all times;
- Non-compliance with this policy will be treated seriously and will not be tolerated;

The Board of Directors of DOC Cleaning Limited are required to ensure:

- They create a productive and safe working environment, promoting diversity and inclusion in their workforce;
- They develop new practices, as appropriate, to ensure all employees, contractors and customers are treated fairly;
- They can demonstrate continuous improvement in practices to promote diversity and equal opportunities for all.

13. LEGISLATION AND CODES OF PRACTICE

We will comply with and exceed where possible, current national legislation and relevant codes of practice where we operate. We will monitor our compliance with this policy and the requirements of relevant underpinning legislation as appropriate.

14. PARTNER ORGANISATIONS

We are committed to actively working with partner organisations to ensure our policies, procedures and practices are in line with best practice.

15. PRACTICES AND STANDARD OPERATING PROCEDURES

Our company will put in place practices and standard operating procedures to ensure the commitments in this policy are applied and implemented throughout the organisation.

16. VEHICLES

We will also take reasonable steps to ensure that our vehicles are in good condition for our staff and comply with the relevant legislation in which they operate.

17. ACCESS TO INFORMATION

We will seek to ensure that information is made available to our customers and employees in alternative formats as required.

18. RECRUITMENT

All recruitment will be carried out with regard to fairness, equality and consistently for all candidates at all times. Recruitment practices will be inclusive and we will endeavour to ensure there are no barriers to employment of suitable candidates.

19. STAFF TRAINING

We will provide our staff with the necessary guidance and training to ensure the effective implementation of this policy and to ensure we are an inclusive employer and service provider.

20. COMPLAINTS

Any employee who feels that he or she has grounds for complaint in relation to bullying, discrimination, harassment or victimisation, has the right to pursue the complaint through our grievance procedures. Customers who feel they have grounds for complaint may pursue these through our operating company customer complaints procedures. We will ensure our complaints/feedback procedures can be accessed and used by everyone.

21. REPORTING

We are committed to monitoring and reporting on our actions and achievements in relation to implementing this diversity policy both internally and externally.

22. AUDIT

We are committed to ensuring that our operations comply with the requirements of this policy and will periodically audit its implementation.

23. HUMAN RIGHTS POLICY

DOC Cleaning Limited supports the principles of the United National Universal Declaration of Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work. We will adhere to the following principles in respect to our staff: -

- We will treat all employees fairly and honestly, regardless of where they work. All staff will have agreed terms and conditions in accordance with local law or practice and will be given appropriate job skills training;
- We will pay a fair wage reflecting local markets and conditions. We will always meet National Minimum Wage;
- Working hours shall not be excessive. They shall comply with industry guidelines and national standards where they exist;
- We will not employ illegal child labour, forced or bonded labour, forced overtime or condone illegal child behaviour;

- Employees have the right of freedom of association and collective bargaining. We respect the right of our employees to choose whether or not to join a trade union without influence or interference from management;
- We will negotiate in good faith with the properly elected representatives of our employees;
- We will abide by the non-discrimination laws where we operate;
- We will not use or condone the use of corporal punishment, mental or physical coercion or verbal abuse. We have disciplinary procedures for any member of staff whose conduct falls below the required standard;
- We have formal grievance procedures through which staff can raise personal and work-related issues.

All staff will be given reasonable access to bathroom and rest facilities.

24. DATA PROTECTION

We will comply with the relevant principles governing data protection in which we operate.

25. CUSTOMERS

DOC Cleaning Limited wants to lead the way in transforming the way people perceive cleaning and the way they feel about the industry. We strive for maximum success in everything we do in order to achieve customer and employee satisfaction.

We will:

- Act in accordance with fair business, marketing and advertising practices; taking all reasonable steps to ensure the safety of our services;
- Respect the human rights of our customers – our security and revenue protection arrangements are consistent with international standards for law enforcement;
- Provide transparent and effective procedures that address customer complaints and contribute to fair and timely resolution of disputes without undue cost or burden;
- Not make representations or omissions, not engage in any other practices that are deceptive, misleading, fraudulent or unfair;
- Respect customer privacy and provide protection for personal data in accordance with the relevant local law.

26. SUPPLIERS: ETHICAL PURCHASING POLICY

- We purchase a wide range of goods and services required in the operation of our business and we also rely heavily on a number of key suppliers for the delivery of our core supplies and services. Good working relationships with our suppliers are therefore central to the success of our business. For this reason, we clearly state our purchasing policy as part of ensuring that our business standards are integrated throughout the supply chain;

- We are committed to obtaining and retaining competitive goods and services while at the same time ensuring they are from sources which have not jeopardised human rights, safety or the environment;
- We aim to develop strong relationships with our suppliers, based on mutual trust, understanding and respect;

More specifically we expect our suppliers to:

- Adhere to business principles consistent with our own;
- Ensure that their products and services are produced and delivered to comply with all legislation relevant to their business;
- Seek to maintain continuous improvement in their supply chain relationship with us;
- Ensure they adopt and implement acceptable safety, environmental, product quality, product stewardship, labour, human rights, social and legal standards in line with our own code and to ensure these issues are acceptably managed within the supply chain for any products supplied to us.

We will seek to work with our key suppliers to:

- Develop long-term meaningful relations to the benefit of both parties;
- Improve the quality, environmental performance and sustainability of goods and services where this can be achieved to the benefit of both parties.

27. ENVIRONMENTAL POLICY

Through our core business activities, we are committed to providing good quality, reliable and cost effective cleaning services to all our customers. Our core business strategy is to increase customer confidence and encourage a greater move towards the use of our services. This will, in turn, support the needs of society to achieve more sustainable business. At the same time we recognise the environmental impacts arising from our business activities and are committed to reducing these through effective environmental management.

Our policy is to strive to achieve continual improvement in environmental performance.

We are committed to: -

- Preventing pollution and reducing the overall impact of our operations on the environment;
- Maintaining an internal management structure for the management of environmental issues, which includes clearly defined responsibilities for environmental management capable of delivering this policy commitment;
- Complying with, and where possible exceeding applicable legal and other requirements relating to the organisation;
- Monitoring our environmental performance and setting objectives and targets for improvement providing appropriate training and awareness programmes for our staff.

We recognise the key role we have to play in both reducing and contributing to greenhouse gas emissions from within our operations. Our commitment in this area is set out in our Climate Change Policy.

28. CLIMATE CHANGE POLICY

Climate change has now been recognised as an international issue with national governments on both sides of the Atlantic committed to taking action to reduce greenhouse emissions. As a business, we recognise that we emit greenhouse gases from operating our vehicle fleet. At the same time, we have a role in supporting governments and communities to reduce the impacts of climate change from road transport by helping to reduce traffic congestion and air pollution by offering a real alternative to the car.

Our key climate change commitments are: -

- To assess the potential impact to our business from evolving climate change policies as part of our ongoing risk management processes;
- To work actively with our suppliers to improve the fuel efficiency of our vehicles;
- To report annually on our greenhouse gas emissions from all vehicles and property in our ownership;
- To actively promote improved energy efficiency and fuel efficiency within our business;
- To support research into transport policy and the use of alternative fuels;
- To stay abreast of alternative fuel developments and continue to assess their commercial viability.

Signed:



Date: 09.04.13

Name: Lee Andrews

Position: Chairman/CEO