

Pell Frischmann

CORPORATE SOCIAL RESPONSIBILITY

The Company's policy on corporate social responsibility applies to all companies in the Pell Frischmann Group including any subsidiaries.

ETHICS POLICY

The Company operates its business activities with regard to the highest ethical standards and strict observance of legal obligations in relationships with clients; employees, subcontractors, suppliers, society, health and safety, and the environment. The Board of Directors acknowledges the benefit to individuals and society that accrues from ethical practice and conversely the potential damage that can accrue from non-ethical practice. We are committed in accordance with our Ethos and Values; to foster mutual honesty and respect in all external and internal relationships.

Our service to clients aims to promote transparency in ethical practice, whilst observing their confidentiality. We believe this practice is essential for sustaining client relationships and business success.

Our commitment to employee relations is based on an open and honest culture that is supported by individual training and development programmes to deliver job satisfaction and career progression. Our commitment is consolidated in our Equal Opportunities Policy.

We aim to avoid damage, unfair exploitation or bias in the impact of our activities on individuals, business entities, society and the environment. Our commitment is supported by separate policies for Health and Safety, the Environment, Anti-bribery and Anti-slavery and Human Trafficking.

In pursuance of our ethics policy we will:

- Communicate openly and honestly with our employees and promote a culture where employees can report concerns about ethical issues without fear of discrimination
- Maintain an open and professional relationship with clients, business associates and the community
- Never engage in slavery and human trafficking; bribery and corrupt practice, and maintain a high standard of professional behaviour, which will serve as an example to others
- Respect the confidentiality and use of privileged information of clients and business associates
- Never knowingly generate, communicate or endorse any data, analysis, advice or opinion that is untrue
- Respect all contractual obligations with suppliers of goods and services
- Aim to include sustainable development in our business operations in order to protect the environment
- Respect the cultures and legislation of foreign countries in which we operate
- Require all our employees:
 - to act honestly and to follow the highest standards of ethical business practice
 - to declare any personal interest, which may bias their independent judgement
 - not to solicit any gifts or favours nor to accept any gifts or favours, other than small tokens of hospitality that are not capable of being misconstrued
 - to report any alleged illegal or unethical act to a Director
- Never unfairly exploit any absence of legislation or regulation in employee relations or business governance to discriminate against any employee or business entity
- Observe highest standards of corporate governance

The Company takes any potential conflict seriously. Our policy is full disclosure therefore avoiding any consequences of a conflict emerging later. Any potential conflict is immediately communicated internally and externally and appropriate actions taken. Proven solutions include the introduction of a "firewall" - an information barrier designed to the approval of clients which involves moving the physical undertaking of the project to a separate geographical location, putting into place processes to protect data and briefing the affected teams fully to reinforce their respective confidentiality obligations.

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SOCIAL AND COMMUNITY POLICY

The Company takes active responsibility for the impact of our business activities on society and the environment. We believe that community participation encourages long-term relationships with our clients and enhances the personal development of our employees. We respect the human rights of our employees, clients and the communities in which we operate and our social and community responsibilities are underpinned by our Ethics Policy which governs our approach to all business relationships.

We will deliver and monitor our social and community responsibilities under the following headings:

- Employee relations
- Health and safety
- Environmental performance and sustainable development
- Community relations
- Client service

Employee relations

We recognise the value and contribution of our employees and encourage them to achieve their full potential. Our employee relations policy is underpinned by a separate Equal Opportunities Policy and we will:

- Communicate openly and honestly with our employees
- Value diversity and recruit, develop and promote on merit
- Provide a safe and secure working environment
- Seek to re-train and re-deploy individuals when business requirements change
- Actively encourage the good health and well-being of our employees
- Support employees who suffer long and short-term health problems
- Apply effective internal controls to protect employee information under data protection legislation

Health and Safety

We recognise our responsibilities to avoid health and safety risks for employees and the community which may be affected by our work. This is supported by our separate Health and Safety Policy. In pursuance of this policy we apply a health and safety management system and safe systems of work, and we will:

- Monitor and report on our performance on a regular basis
- Investigate all accidents and incidents and widely communicate and implement any remedial actions
- Promote a culture of continuous improvement
- Incorporate health and safety in the selection of our subcontractors, agents and suppliers

Environmental performance and sustainable development

We aim to include principles of sustainable development in our business activities and to support long-lasting development which protects and enhances the environment, conserves natural resources and supports the community. In pursuance of this policy we apply an environmental management system and we will:

- Monitor and report on our performance on a regular basis
- Safeguard public health
- Prevent pollution, reduce waste and conserve energy and natural resources
- Assess and manage the environmental risks associated with our operations
- Incorporate environmental performance in the selection of our subcontractors, agents and suppliers

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Community relations

We recognise our responsibilities to promote relations with communities in which we operate and this is enhanced by personal development of our employees that may derive from community participation. In pursuance of this duty we will:

- Ensure our relations with communities are open and accountable;
- Respect the cultures and legislation of foreign countries in which we operate
- Endeavour to protect, preserve and enhance the physical environment through a policy of sustainable development
- Ensure our employees or representatives carry appropriate company identification or letters of authority where appropriate

Client service

We recognise that our services may involve community or environmental activities on behalf of clients under any of the above heads, and we will apply the same principles as if they were under our direct responsibility. In addition, we will:

- Ensure the safety, quality and value of our services to clients
- Apply effective internal controls to protect client information under data protection legislation
- Promote timely and fair resolution of client complaints

Tushar Prabhu

Tushar Prabhu
Chief Executive Officer
1 May 2018