

ETHICAL POLICY

Policy Statement: McSence Group is committed to ensuring a high standard of ethical and environmental trade practices, including the provision of safe working conditions and the protection of workers' rights, across all our businesses. McSence conducts its business in accordance with the provisions of this Code of Ethical Policy ("the Code") and expects its Suppliers to observe the Code's provisions and to demonstrate a similar commitment to an ongoing programme of ensuring and, where necessary, improving, ethical and environmental practices. This Code of Ethical Policy enshrines all principles of the Ethical Trading Initiative Base Code¹ and reflects the international standards set out in the International Labour Organisation (ILO) Conventions².

We will ensure that employees are not disadvantaged by conditions or requirements, which cannot be shown to be justifiable. We will not tolerate acts which breach this policy and all instances of such behaviour, or alleged behaviour, will be taken seriously, be fully investigated and may be subject to our disciplinary procedures. We will install facilities for people with disabilities in existing premises, wherever practicable to do so. Whenever we invest in new or refurbished premises, every effort will be made to provide for the needs of staff and visitors with disabilities.

The Company keeps its equal opportunity policies under review, monitors progress and takes such affirmative actions as may be needed to eliminate any form of unlawful discrimination and to encourage the composition of a well-balanced workforce.

If an employee feels that they have been subjected to discrimination, they should initially talk to their Manager (or another senior manager if your own manager is the alleged source of the discrimination). Should the employee wish to lodge a formal grievance, the grievance policy and guidelines in this Handbook should be followed.

All Employees: This policy applies to all persons working for or on our behalf of the McSence Group of Companies which includes the subsidiary companies - *McSence Communication Ltd, McSence Ltd, McSence Services Ltd & McSence Workspace Ltd* in any capacity including but not limited to:

- ✦ All employees at all levels, prospective employees, agency workers, seconded workers, temporary workers, contractors/sub-contractors, clients, agents, external consultants, volunteers, members of the public, group's supply chain, third-party representatives and/or business partners who will be referred to in our Group policies as "all employees".

The Workplace: This policy applies to all persons working for or on our behalf of the McSence Group of Companies in any capacity at the workplace(s) as defined below which includes but not limited to:

- ✦ McSence Premises, Offices, Units, Business Park, Client's Premises, External Meeting Places, Customers' Homes, Gardens, Sheltered Housing, Whilst On-Call, On-Duty, Emergency Cover, Working from Home including On-Line Meetings, Whilst Driving in Company Time, Working Public Areas (café's, trains, coffee shops, buses etc) and will be referred to throughout this policy as "the workplace".

Scope of the Code: The Code applies to all areas of McSence Group, businesses and to its direct Suppliers as well as to goods and services sourced by McSence Group. McSence Group requires all direct Suppliers to observe the provisions of this Code and requires that such Suppliers, in turn, obtain similar compliance with its provisions from their Suppliers. All parties to whom this Code applies are required to comply with applicable national and international laws. Where the provisions of this Code afford greater protection than national law, the terms of this Code prevail. The objectives of the Code are:

- ✦ To set out a clear statement of McSence Policy
- ✦ To promote the adoption and improvement of ethical practices
- ✦ To implement effective processes for improvement of trade practices

Compliance with the Code: BBCW recognises that its Suppliers may not be able to achieve all the standards laid out in this Code immediately but is willing to engage with Suppliers who:

- ✦ Have implemented, or are willing to implement, appropriate and workable processes for raising standards to be compliant with this Code within an agreed period
- ✦ Can demonstrate a responsible and transparent approach to their working and general practices
- ✦ Have successfully undergone any required audit or verification procedure in accordance with BBCW's audit procedure which demonstrates compliance with BBCW's Core Requirements; and have demonstrated an ongoing commitment to improving working and ethical standards

The Code Requirements: McSence Group will not engage in business with Suppliers who do not meet our Requirements and McSence Group will be entitled to terminate any contract with any Supplier who is found to be non-compliant with any of the Core Requirements. Such termination on the part of BBCW may be without notice and shall be without liability of any description on the part of McSence Group (whether to the Supplier or any third party contracted by the Supplier). McSence Group of Companies requirements are as follows:

- ✦ Suppliers must not use any form of forced, bonded or involuntary labour, and workers must not be obliged to lodge identity papers or pay any deposit as a condition of work
- ✦ Workers must not be subject to physical or verbal abuse or threats or intimidation of any description
- ✦ Workers must not be required to work extreme hours or work without adequate rest periods
- ✦ Work sites used by Suppliers must be safe and hygienic with an adequate number of safe and accessible fire exits from all buildings including living accommodation and workers must have access to drinking water
- ✦ Workers' life or limb must not be endangered due to the use of dangerous machinery, unsafe building structure or layout, or hazardous chemicals. Where serious or fatal accidents have occurred, Suppliers must demonstrate to the satisfaction of BBCW that all appropriate steps have been taken to prevent similar accidents occurring in the future.
- ✦ Living accommodation, where provided, must be in buildings that are separate from other areas of the workplace and have an adequate fire alarm system
- ✦ Suppliers must pay wages in accordance with at least minimum wage Legislation
- ✦ Suppliers must maintain proper and accurate employment records including calculation of pay and hours worked, and Suppliers must be transparent and cooperative about the inspection of employment records
- ✦ Suppliers must not engage in bribery, corruption or other similar unethical practices to gain competitive advantage

Company Intranet – Staff Zone: All the McSence Groups policies, procedures, handbooks are available on-line to all employees on the McSence Group's Staff Zone Intranet via our website [Login | McSence](#)

Compliance: Failure to comply with the provisions of this Policy may result in Disciplinary proceedings.



McSence Group Signatory:

David Maxwell | Chief Executive

McSence Group - McSence Communication Ltd, McSence Ltd, McSence Services Ltd & McSence Workspace Ltd

T: 0131 454 1500 | E: mail@mcsence.co.uk | W: www.mcsence.co.uk | FB: www.facebook.com/McSenceGroup

Policy Amendments & Revisions: This policy will be reviewed annually and, if necessary, revised in the light of legislative or organisational changes. Improvements will be made by learning from experience and the use of an established annual review. Should any amendments, revisions, or updates be made to this policy it is the responsibility of the Company Senior Management Team (SMT) to see that all relevant employees receive notice and training if necessary.