

QMS MANUAL SECTION 3 – POLICY STATEMENTS

3.5 - BUSINESS CODE OF CONDUCT

1.0 CORPORATE RESPONSIBILITY STATEMENT

GBC Industrial Tools ('the Company) recognises its obligations to act responsibly, ethically and with integrity in its dealings with staff, customers, suppliers, other interested parties, the community and the environment as a whole.

To this end, the Company strives to eb a good corporate citizen and is committed to promoting protection of the environment: supporting charities; and working with suppliers who uphold similar values.

To this end: -

- The Company minimises health and safety risks to staff and visitors through good H & S practice. The Company shall provide, and strive to maintain, a clean, healthy and safe working environment in line with our Health and Safety Policy and safe systems of work.
- The Company has a separate Environmental Policy statement clearly defining its commitment to delivering a net positive impact on the environment.
- The Company is proud that its quality management system is recognised and accredited in line with ISO 9001 requirements.
- The company takes seriously all feedback that we receive from all interested parties and, where possible, maintain open dialogue with to ensure that we fulfil the requirements outlined within this policy.
- The Company shall be open and honest in communicating our strategies, targets, performance and governance to our stakeholder(s).
- The Company shall encourage suppliers and contractors to adopt responsible business policies and practices.
- The Company will operate an equal opportunities policy for all present and future employees and will offer our employees clear and fair terms of employment and provide resources to enable their continual development.
- The Company shall maintain a clear and fair employee remuneration policy and shall maintain an 'open door' policy for employee consultation and business involvement.
- The Company will provide safeguards to ensure that all employees of whatever nationality, colour, race or religious belief are treated with respect without sexual, physical or mental harassment.
- The Managing Director is responsible for the implementation of this policy and will make the necessary resources available to realise our corporate responsibilities. The responsibility for our performance on this policy rests with all staff throughout the company.



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2.0 BUSINESS CODE OF CONDUCT

All staff are required to have read and agreed with the following 9 statements:

2.1 CONFIDENTIALITY

We are committed to maintaining the highest degree of integrity in all our business dealings with potential, current and past clients, both in terms or commercial confidentiality, and the protection or personal information received in the course if providing the products and services concerned. We extend the same standards to all our suppliers, employees, and associated interested parties.

2.2 ETHICS

We always conduct our own services honestly and honourably and expect our clients and suppliers to do the same. Our advice, strategic assistance and the methods imparted take proper account of ethical considerations, together with the protection and enhancement of the moral position of our clients and suppliers.

2.3 DUTY OF CARE

Our actions and advice will always conform to relevant law, and we believe that all businesses, including GBC Industrial Tools, should avoid causing any adverse effect on the human rights of people in the organisations we deal with, the local and wider environments, and the well-being of society at large. We always require all personnel to respect the environment and be mindful of the impact that our actions have on the environment.

2.4 BRIBERY, CORRUPTION & FRAUD

GBC Industrial Tools does not permit the bribery of any person involved in GBC or any customer, supplier business partner. In addition, GBC does not tolerate fraud and all employees must observe the Company's Anti-bribery & Corruption Policy.

2.5 CONFLICT OF INTEREST

Due to the sensitive nature of our services to some of our clients and trading agreements that may be in place, we will not provide products or services of a similar nature to a direct competitor of an existing client (unless prior approval gained from MD), and all employees must avoid situations where personal interests may conflict, or appear to conflict, with GBC's interests.



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2.6 INTELLECTUAL PROPERTY & MORAL RIGHTS

We retain the moral right in, and ownership of, all intellectual property that we create unless agreed otherwise in advance with our clients. In return we respect the moral and intellectual copyright vested in our clients' intellectual property.

2.7 QUALITY ASSURANCE

We maintain the quality of what we do through constant ongoing review with our clients, of all aims, activities, outcomes and the success of every business activity. We engage regular quality assurance internal audits, and we are accredited with the ISO 9001 Quality Management certification. Further details can be obtained on request, and the certification is displayed in the foyer of the office.

2.8 PROFESSIONAL CONDUCT

We conduct all our activities professionally and with integrity. We take great care to be completely objective in our judgement and any recommendations that we give, so that issues are never influenced by anything other than the best and proper interests of our clients.

2.9 EQUALITY & DISCRIMINATION

We always strive to be fair and objective in our advice and actions, and we are never influenced in our decisions, actions or recommendations by issues of gender, race, creed, colour, age, or personal disability.

As the Managing Director of GBC Industrial Tools Limited, I accept responsibility for ensuring that the Company fully complies with this policy.

Howard Lloyd

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Monday 20th Feb 2017