

CORPORATE SOCIAL RESPONSIBILITY POLICY

Issue: 2

Date Implemented: May 2021

Accepted by:

Name: Kyri Anastasi

Title: CEO

Change/Review Notes

Date of Issue/Review	Issue:	Revision No:	Details of Revision
May 21	1	0	New policy issued
May 22	1	1	Annual review: • Amendment record inserted • Template design updated
Oct 22	1	1	Annual review: No change
Feb 23	1	2	Signature added (CEO & COO)
June 24	1	2	Annual review: No change
Feb 25	1	3	Annual review: Footer changed
Feb 26	2	0	Annual review: Document layout updated with a new background template.

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1. Policy Statement

Circle UK Group Ltd (CUKG) strives to be a responsible and ethical corporate organisation. Through the commitment of its management and staff, CUKG actively promotes:

- **Protection of the environment**
- **Support for charities and local communities**
- **Equal opportunities and diversity**
- **Safe and efficient working practices**
- **Ethical relationships with suppliers and contractors**

CUKG is committed to acting in a socially responsible manner by continually improving its performance while meeting all relevant legal and regulatory requirements.

2. Scope

This policy applies to:

- **All employees of Circle UK Group Ltd**
- **Contractors and temporary workers**
- **Suppliers and subcontractors working on behalf of the Company**
- **Business operations across all locations where CUKG operates**

3. Environmental Responsibility

CUKG is committed to reducing the environmental impact of its activities by:

- **Conserving natural resources used in our offices**
- **Minimising adverse environmental effects associated with employee travel**
- **Promoting environmentally responsible practices throughout the organisation**
- **Encouraging suppliers and contractors to uphold similar environmental standards**

4. Social Responsibility and Core Service Values

CUKG expects all staff to behave in a socially responsible manner and deliver a quality service focusing on:

- **Protection of Life**
- **Protection of Property and Premises**
- **Prevention of Loss and Waste**
- **Prevention and Deterrence of Crime**

5. Charitable and Community Support

The Company supports various charitable events and organisations. Details of current charitable activities will be provided upon request by the Company Secretary.

6. Commitment to Our People

CUKG recognises that our employees are our greatest asset and key to continued growth and success. We are committed to providing careers and working environments where individuals can achieve their fullest potential.

The Company will:

- **Keep employees informed of company affairs through news circulars and staff meetings**
- **Encourage open discussion of operational issues with line management**
- **Promote suggestions that improve performance and efficiency**
- **Support the development of future talent through training and transparent workforce planning**

7. Employment Standards

Circle UK Group Ltd:

- **Provides clear and fair terms of employment**
- **Encourages employees to develop skills and progress in their careers**
- **Does not employ underage staff**
- **Ensures staff understand company policies on:**
 1. **Insider trading**
 2. **Bribery and inappropriate gifts**
 3. **Money laundering**
 4. **Whistleblowing**

CUKG promotes a harmonious working environment with **zero tolerance** toward bullying, harassment, or discrimination linked to an individual's sex or other personal characteristics.

8. Equal Opportunities

CUKG is committed to a policy of equal opportunity and diversity in employment. We aim to:

- **Recruit, train, and promote employees based solely on merit and suitability for the role**
- **Treat all applicants and employees regardless of:**
 1. **Race**
 2. **Sex**
 3. **Marital status**
 4. **Age**
 5. **Nationality or ethnic origin**
 6. **Religious belief**
 7. **Sexual orientation**
 8. **Disability**
- **Ensure no employee suffers harassment or intimidation**

9. Disabled Employees

CUKG will provide employment opportunities and make reasonable adjustments to accommodate disabled persons wherever business requirements allow.

If an existing employee becomes disabled, every reasonable effort will be made to ensure:

- **Continued worthwhile employment**
- **Access to appropriate career development opportunities**

10. Responsibility to Customers

CUKG seeks to be honest and fair in all customer relationships and will:

- **Deliver agreed standards of product and service**
- **Take all reasonable steps to ensure safety and quality in services provided**

11. Ethical Supplier Relationships

CUKG seeks to be honest and fair in its dealings with suppliers and subcontractors and will:

- **Pay suppliers in accordance with agreed terms**
- **Maintain a strict policy against bribery or substantial favours**
- **Encourage suppliers to uphold the same ethical principles and standards**

12. Local Communities

CUKG aims to make the communities in which we work better places to live and do business by:

- **Being sensitive to local cultural, social, and economic needs**
- **Protecting and preserving the environment wherever we operate**
- **Supporting sustainable community development**

13. Approval and Review

This policy is endorsed by senior management and will be reviewed regularly to ensure it remains effective, relevant, and aligned with company values and legal obligations.

Signed for and on behalf of Circle UK Group Ltd.



COO - Karol Konicz



CEO - Kyri Anastasi