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1 Introduction

1.1 Scope

The purpose of this document is to illustrate Trailight's commitment to be socially accountable to itself, its stakeholders, and the public.

This policy applies to employees, contractors, consultants, temporaries and other workers at Trailight including all personnel affiliated with third parties.

1.2 References

1.2.1 Standards

Standard	Title	Description
ISO 26000:2010	Guidance on social responsibility	Guidelines and underlying principles

1.2.2 Documents

Document Number	Title
HAND-0002-HR	Employee Health and Safety Handbook
POL-0008-HR	Environmental Planning and Sustainability Policy
POL-0016-HR	Equality Policy

1.3 Terms and Definitions

- “we”, “our”, “the company” and “the organisation” refer to Trailight
- “staff” and “workers” means all of those who work under our control, including employees, contractors, interns etc.
- “ELT” refers to the Executive Leadership Team

2 Roles and Responsibilities

2.1 CEO

Our Chief Executive Officer assumes ultimate accountability for Corporate Social Responsibility, supported by the ELT.

2.2 ELT

The ELT is responsible for giving direction to the respective departments and business areas to support our overall Corporate Social Responsibility strategy.

2.3 All Staff

All employees of Trailight, at every level, have an individual responsibility for ensuring adherence to this Policy.

3 Policy Statement

3.1 ISO 26000:2010

Our Corporate Social Responsibility policy has been developed in alignment with a number of the core subjects from ISO 26000:2010.

The full scope of the standard is shown below for reference.

ISO 26000:2010(E)

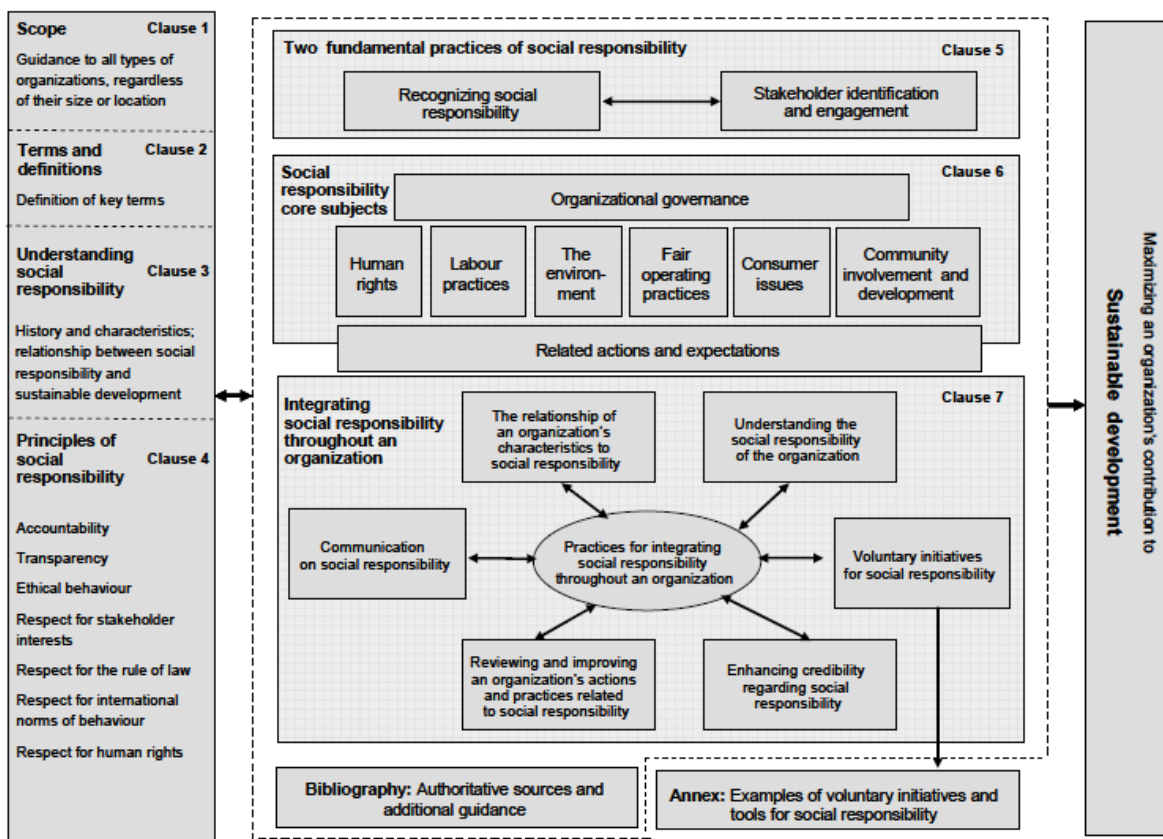


Figure 1 — Schematic overview of ISO 26000

3.2 Organisational governance

The primary focus of our organisational governance is to incorporate the principles of social responsibility into our decision making and business activities.

The ELT demonstrates leadership by giving direction to the respective departments and business areas to support our overall Corporate Social Responsibility strategy.

Our decision making processes should enable us to:

- develop strategies, objectives, and targets that reflect our commitment to social responsibility;
- demonstrate leadership commitment and accountability;
- create and nurture an environment and culture in which the principles of social responsibility are practised;
- create a system of economic and non-economic incentives related to performance on social responsibility;
- use financial, natural and human resources efficiently;
- promote a fair opportunity for underrepresented groups (including women and racial and ethnic groups) to occupy senior positions in the organisation;
- balance the needs of the organisation and our stakeholders, including immediate needs and those of future generations;
- establish two-way communication processes with our stakeholders, identifying areas of agreement and disagreement and negotiating to resolve possible conflicts;
- encourage effective participation of all levels of employees in our social responsibility activities;
- balance the level of authority, responsibility and capacity of people who make decisions on behalf of the organisation;
- keep track of the implementation of decisions to ensure that these decisions are followed in a socially responsible way and to determine accountability for the results of the organisation's decisions and activities, either positive or negative; and
- periodically review and evaluate the governance processes of the organisation, adjust processes according to the outcome of the reviews and communicate changes throughout the organisation.

3.3 Human rights

When focusing on human rights, we align with the fundamental rights at work as identified by the International Labour Organization (ILO).

3.3.1 Freedom of association and collective bargaining

All staff have the right to establish and join organisations of their own choosing, without previous authorisation. Terms and conditions of employment may be fixed by voluntary collective negotiation where workers choose to do so. Collective agreements should include provisions for the settlement of disputes.

3.3.2 Elimination of forced labour

We do not engage in or benefit from any use of forced or compulsory labour.

We do not engage in or benefit from any form of prison labour.

3.3.3 Equal opportunities and non-discrimination

All of our policies are free from discrimination based on race, colour, gender, religion, nationality, social origin, political opinion, sexual orientation, health status, age or disability.

As per our Equality Policy, we take steps to prevent harassment in the workplace by:

- regularly assessing the impact of its policies and activities on promotion of equal opportunities and non-discrimination; and
- taking positive actions to provide for the protection and advancement of vulnerable groups.

3.3.4 Abolition of child labour

We do not engage in or benefit from any use of child labour.

3.4 Labour practices

We recognise that the creation of jobs and paid work are among the most important economic and social contributions that an organisation makes.

3.4.1 Employment and employment relationships

As part of our commitment to labour practices, we:

- are confident that all work is performed by women and men who are legally recognised as employees or who are legally recognised as being self-employed;
- recognise the importance of secure employment to both the individual worker and to society;
- provide reasonable notice, timely information and consider how to mitigate adverse impacts to the greatest possible extent when considering changes in our operations;
- ensure equal opportunities for all workers and not discriminate either directly or indirectly in any labour practice;
- protect personal data and privacy of workers; and

- not benefit from unfair, exploitative or abusive labour practices of our partners, suppliers or subcontractors, including home workers.

3.4.2 Conditions of work and social protection

As part of our commitment to labour practices, we:

- ensure that the conditions of work comply with national laws and regulations and are consistent with applicable international labour standards;
- provide decent conditions of work with regard to wages, hours of work, weekly rest, holidays, health and safety, maternity protection and ability to combine work with family responsibilities;
- wherever possible, allow observance of national or religious traditions and customs;
- provide conditions of work for all workers that permit, to the greatest extent possible, work-life balance and are comparable with those offered by similar employers in the area;
- provide wages and other forms of remuneration in accordance with national laws, regulations or collective agreements;
- provide equal pay for work of equal value;
- respect the right of workers to adhere to normal or agreed working hours established in laws, regulations or collective agreements;
- respect the family responsibilities of workers by providing reasonable working hours, parental leave and, when possible, childcare and other facilities that can help workers achieve a proper work-life balance; and
- compensate workers for overtime in accordance with laws, regulations or collective agreements;

3.4.3 Health and safety at work

As part of our commitment to labour practices, we:

- develop, implement and maintain an occupational health and safety policy based on the principle that strong safety and health standards and organisational performance are mutually supportive and reinforcing;
- understand and apply principles of health and safety management, including a suitable hierarchy of controls
- analyse and control the health and safety risks involved in our activities;
- communicate the requirement that workers should follow all safe practices at all times and ensure that workers follow the proper procedures;
- record and investigate all health and safety incidents and problems in order to minimize or eliminate them;

- strive to eliminate psychosocial hazards in the workplace, which contribute or lead to stress and illness;
- provide adequate training to all personnel on all relevant matters;

This is supported by our Employee Health and Safety Handbook.

3.5 The environment

We recognise that the decisions we make and activities we carry out will invariably have an impact on the environment. To reduce our environmental impact, we have adopted an integrated approach that takes into account the direct and indirect economic, social, health and environmental implications.

In addition to complying with laws and regulations, Trailight assumes responsibility for the environmental impacts caused by our activities. We aim to continually monitor and improve our performance, as well as the performance of our supply chain.

Our risk management programme takes sustainability into account with the aim of assessing, avoiding, reducing and mitigating environmental risks and impacts that arise from our activities.

As per our Environmental Planning and Sustainability Policy, we aim to:

- minimise pollution, such as greenhouse gas emissions and office waste;
- make efficient use of energy such as gas and electricity; and
- make efficient use of materials such as paper, cardboard, plastics and raw materials

3.6 Fair operating practices

Our focus on fair operating practices is based on anti-corruption and socially responsible behaviour in relation to our partners, suppliers and customers.

We aim to promote positive outcomes as part of our relationships with other organisations within our sphere of influence. Ethical behaviour is fundamental to establishing and sustaining legitimate and productive relationships between organisations. Therefore, ethical behaviour underpins all operating practices between Trailight and other organisations.

We strive to find solutions and report customer complaints in accordance with our standards of service. Our contracts will clearly set out the agreed terms, conditions and the basis of our relationship. We will operate in a way that protects against unfair business practices.

To prevent corruption, we:

- identify the risks of corruption and implement policies and practices to counter them;
- ensure that the ELT sets an example for anti-corruption and provides commitment, encouragement and oversight for implementation of the policies; and
- support and train our employees in their efforts to eradicate bribery and corruption

To promote social responsibility in our value chain, we:

- integrate ethical, social, environmental and gender equality criteria, and health and safety into our purchasing and supplier selection criteria;
- encourage other organisations to adopt similar policies
- carry out appropriate due diligence and monitoring of organisations that we have relationships with

3.7 Communication

Communication is critical to many different functions in social responsibility. We communicate our activities externally through our website and internally through our intranet, newsletters and team briefings. This raises a sense of awareness in the company as well as acting as a prompt for staff to get involved in the programmes where applicable.