

1.9 ETHICAL POLICY STATEMENT

Our ethical policy has been established to set standards and provide guidelines regarding the way W REILLY should operate in Ethical matters. It is important to retain this set of core values and approaches to the process of doing business on a daily basis.

The Ethical policy focuses around nine key areas as follows:

Employees

W REILLY values its Employees as a key resource. An atmosphere of good employee communication, involvement & responsibility both individually and as a team is of central importance, also the personal development and optimum use of Employee talent is encouraged at all times.

Every employee has an equal opportunity for personal recognition and career development, regardless of personal background or belief. No form of discrimination or harassment will be tolerated. An important part of this policy is recruiting, selecting, rewarding and promoting people who demonstrate entrepreneurial behavior and show individual initiative in combination with a high degree of knowledge and experience of our products, markets and culture.

Customers

Everybody must play their part in providing quality and efficiency to customers. W REILLY believes that integrity in dealings with customers is a prerequisite for a successful and sustained business relationship. Personal contact, helpful and responsive action are features of the service we provide to develop long term relations with our customers.

Suppliers

W REILLY believes in supporting UK trade and therefore will only buy from preferred UK based manufacturing companies if possible. W REILLY will aim to develop relationships with suppliers based on mutual trust and all dealings will be conducted in a professional manner at all times. We also undertake to pay our suppliers on time and according to agreed terms. All supplier relationships are assessed against our Quality standards.

Community

W REILLY seek to comply with all legislation affecting its operations. We will seek to serve and support the community in which it operates by providing services efficiently and profitably, and by providing good employment opportunities and conditions. We will take into account the concerns of the wider community including both national and local interests. In particular, we will agree a chosen local charity each year and endeavor to raise money outside of business interests for this Charity.

The Environment

W REILLY is concerned with the conservation of the environment in its broadest sense, and recognises that certain resources are finite and must be used responsibly. We will therefore:

Work with others toward a consensus on environmental quality standards which are desirable and attainable. Aim to improve all aspects of the business in respect of environmental issues.

Pay particular attention to environmental issues including the conservation of energy and natural resources, the control of noise levels, recycling of waste material and the utilisation of non-polluting

technology. This is reflected in our emphasis to supply recycled promotional products as an option wherever possible

Health & Safety

W REILLY provides safe working conditions for all its Employees and will do all that is reasonable and practicable to:

- Protect the health and safety of its employees and minimise any adverse effects on the environment
- Implement working practices to prevent personal injury and damage to property
- Making all employees aware of risk assessments and raise awareness of their own responsibilities for the health and safety of themselves and others

Human Rights

W REILLY is committed to the prevention of any violation of established Human Rights of any kind, particularly where child labour or undesirable forced acts are involved.

Social Responsibilities

W REILLY is committed to and encourages collaboration with organisations that support Fair Trade and operate non-exploitative employment practices in their own businesses and supply chains throughout the world. It will conversely not invest in or do business with any organisation that:

- Manufactures or designs weapons, instruments of warfare or torture, or that derives significant revenue from weapons related products or services; or
- Manufactures tobacco products or derives significant revenue from tobacco related production.

Conflict of Interest

This policy does not allow bribery or political contributions and requires employees to seek to avoid conflicts of interest and to disclose any that do exist. Employees must ensure that their actions are not affected by conflicts of interests. This covers the receipt of giving of gifts or hospitality which is prohibited.

Information

W REILLY regards information for the purpose of its business as a corporate asset which must be protected against loss of availability, infringement and improper disclosure. We seek to ensure as far as reasonably practicable, that this information is protected.

This applies also to intellectual property including inventions, trade secrets, technical information, product design, production expertise, customers' information etc.

Records

Honesty, completeness and accuracy of records are vital. Records of transactions should be maintained in an accurate, complete, transparent and timely manner in accordance with accounting principles. No unrecorded funds or assets should be established or maintained.

W REILLY believes that implementation of this ethics policy:

- Sets clear standards for employees.

W. REILLY LTD.
Building Services – All Trades

- Makes good business sense.
- Protects the integrity and enhances our reputation
- Supports the principles of good corporate governance.

This policy applies to all employees of W REILLY;

Date: January 2014

Signed:

A handwritten signature in black ink, consisting of the letters 'WR' in a stylized, cursive font, enclosed within a hand-drawn oval.

Managing Director
W REILLY

Non Controlled