



CSP 11 Corporate Social Responsibility Policy

Rev: 05

Date: 26/02/2024

Corporate Social Responsibility Policy Statement

Special Piping Materials Limited (SPM Ltd) is a socially and environmentally responsible company. Our activities have an impact on the environment, on people, the communities in which we operate, our customers and supply chain.

In all aspects of our responsibilities, we work closely with our employees, clients, suppliers and subcontractors. We strive for continuous improvement and to balance short-term and long-term interests as well as integrate economic, environmental and social considerations into our strategic decision-making.

This policy statement provides the basis for managing our corporate responsibilities through our policies, procedures and practices. Our Corporate Social Responsibility policy and standards are applicable to all Special Piping Materials Group employees.

Corporate Governance

The starting points of Corporate Governance are good business practices (accountable, honest and transparent dealings by the management) and good supervision of this management.

We are accountable for ensuring we minimise our impact through responsible business practices, which go beyond our legal obligations, and by responding to the views of our stakeholders, while remaining a profitable, competitive and growing business.

Our Employees

We recognise the need to be able to attract, develop and retain employees with the potential, skills and experience necessary for the continued development of our business.

We are committed to equality of opportunity and an inclusive working environment where all employees are treated equally with courtesy, dignity and respect and where everyone feels valued. This is further explained in our Equality, Diversity and Equal Opportunities Policy.

We are committed to supporting our people in working to realise their potential and providing opportunities to ensure that our people are equipped with the skills and knowledge to maximise business effectiveness.

Environment, Health & Safety

- SPM Ltd is committed to :
 - protecting the health and safety of all individuals affected by our activities, including our employees, contractors and the public;
 - providing a safe and healthy working environment, and will not compromise the health and safety of any individual. Our goal is to have no accidents and mitigate impacts on the environment by working with our stakeholders, peers and others to promote responsible environmental practices and continuous improvement;
 - environmental protection and sustainability;

Author: QHSE Manager
Owner(s): Managing Directors and General Managers
Approval: Group MD

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- SPM Ltd recognizes that pollution prevention, biodiversity and resource conservation are key to a sustainable environment, and will effectively integrate these concepts into its business decision-making.

All employees and contractors are responsible and accountable for contributing to a safe working environment, for fostering safe working attitudes, and for operating in an environmentally responsible manner. The organisation is committed to:

- Promising to conserve our environment by managing and mitigating the impact of harmful substances, as defined by industry standards.
- Being a socially and environmentally conscious company, operating in full compliance with the local laws and regulations regarding the ethical, corporate governance, labour, health and safety, and environmental compliance of the countries within which we conduct business.

Conflict Materials

We have built up long-term relationships with our suppliers, and expect all suppliers, not just EU based suppliers to comply with the EU Conflict Minerals Regulation 2017/821, which is embedded in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. The Guidance provides detailed recommendations to help companies respect human rights and avoid contributing to conflict through their mineral purchasing decisions and practices. Whilst these recommendations were specifically issued to companies operating in the tin, tantalum, tungsten, and gold (3TG) industries, they are ultimately designed to cover all minerals and geographic regions.

The Supplier shall have due diligence processes in place to make reasonable enquiries in its supply chain, into the country of origin of Conflict Minerals, and the Supplier shall report such data as may be required by SPM to fulfil obligations to customers on sourcing of Conflict Minerals. SPM also carry out due diligence on all suppliers and their processes. [**Please see our Sustainable and Ethical Procurement Policy published on our website.**](#)

Our Customers and Supply Chain

Special Piping Materials Group complies fully with the statutory obligations placed upon us with regards to the Modern Slavery and Human Trafficking Act 2015. We fully expect our suppliers and customers to hold themselves to high standards with regards to supply chain transparency.

We will work with and support our customers in developing sustainable solutions to meet their needs. We will work with our supply chain to maximise value to all partners.

Our Communities

We aim to ensure that our activities cause the minimum of disruption to our neighbours and their communities and, where practical, make a positive contribution to those communities.

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Responsibility for the Policy

Overall responsibility for this policy is:

- **Leslie Buckley**
Group Managing Director, Special Piping Materials Group Ltd

Anti-Slavery & Human Trafficking Statement

Special Piping Materials operate a set of core values, which stem from our family run ethos to reflect in our relationships with our customers, suppliers and employees. Our business values and relationships reflect our attitude towards exploitation of individuals in any form, and more particularly the offences under the Modern Slavery Act 2015. [***Please see our Anti-Slavery Statement published on our website.***](#)

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