

Corporate Social Responsibility (CSR) Policy

Effective Date: 24/11/2025

Review Date: Annual or upon legal/regulatory change

Approved by: Director, GEODEC Limited

1. Purpose & Scope

This Corporate Social Responsibility (CSR) Policy sets out GEODEC Limited's legally compliant approach to operating responsibly, ethically, and sustainably across the United Kingdom.

This policy applies to:

- All GEODEC Limited employees
- Subcontractors and labour-only subcontractors
- Suppliers, agency workers, and consultants
- Any person acting on behalf of GEODEC Limited

Compliance with this policy is **mandatory**. Breaches may result in disciplinary action, removal from site, termination of contract, and reporting to relevant authorities.

2. Legal and Regulatory Compliance

GEODEC Limited will operate in full compliance with all relevant UK legislation, regulations, and recognised standards, including but not limited to:

Health, Safety & Environment

- Health and Safety at Work etc. Act 1974
- The Management of Health and Safety at Work Regulations 1999
- Control of Substances Hazardous to Health Regulations 2002 (COSHH)
- The Construction (Design and Management) Regulations 2015 (CDM 2015)
- Environmental Protection Act 1990
- Waste (England and Wales) Regulations 2011
- Hazardous Waste Regulations

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Clean Air Act 1993

Ethical Conduct & Governance

- Bribery Act 2010
- Fraud Act 2006
- Modern Slavery Act 2015
- Companies Act 2006
- Proceeds of Crime Act 2002
- Data Protection Act 2018 & UK GDPR

Employment & Equality

- Employment Rights Act 1996
- Equality Act 2010
- Working Time Regulations 1998
- National Minimum Wage Act 1998
- Trade Union and Labour Relations (Consolidation) Act 1992

GEODEC Limited will review this policy annually or immediately following any change in UK law affecting this document.

3. Ethical Business Conduct

GEODEC Limited commits to the highest standards of professional integrity.

We will:

- Operate a zero-tolerance approach to bribery, corruption, fraud, kickbacks, or unethical incentives.
- Ensure all commercial decisions are transparent, fair, and documented.
- Maintain accurate financial records as required under the Companies Act 2006.
- Protect client data in compliance with UK GDPR and the Data Protection Act 2018.
- Ensure all employees and subcontractors understand and follow this policy.
- Report any suspected illegal activity to senior management and, where necessary, to the relevant authorities.

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4. Environmental Responsibility

We recognise our duty under UK environmental law to minimise impact.

4.1 Waste Management (Legal Compliance)

We will comply with:

- Duty of Care under the Environmental Protection Act 1990
- Waste (England and Wales) Regulations 2011
- Hazardous waste storage, transport, and disposal rules

GEODEC Limited will:

- Segregate, store, and dispose of waste using licensed carriers.
- Keep Waste Transfer Notes (WTNs) for a minimum of 2 years.
- Prevent pollution and contamination of land, air, or water.

4.2 Sustainable Materials

- Prioritise low-VOC, water-based, and environmentally responsible paints.
- Promote GEODEC Green principles and eco-conscious design solutions.

4.3 Carbon Reduction

- Reduce business travel where possible and use efficient route planning.
- Maintain company vehicles to reduce emissions.
- Review opportunities for hybrid or electric vehicles as operations expand.

5. Health, Safety & Wellbeing

Safety is a legal and moral priority.

GEODEC Limited will:

- Comply with all obligations under the Health and Safety at Work etc. Act 1974.
- Conduct suitable and sufficient Risk Assessments and Method Statements (RAMS).
- Ensure all operatives are competent under CDM 2015.
- Provide mandatory PPE and enforce its use.

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- Ensure safe use of tools, machinery, access equipment, and chemicals (COSHH).
- Report and investigate accidents, near misses, and hazards.
- Maintain an incident log and comply with RIDDOR reporting requirements.

Subcontractors must follow GEODEC Limited's health and safety procedures without exception.

6. Equality, Diversity & Inclusion (Legal Compliance)

We will comply fully with the **Equality Act 2010** by ensuring:

- No discrimination on grounds of age, disability, gender reassignment, marriage/civil partnership, pregnancy/maternity, race, religion or belief, sex, or sexual orientation.
- A workplace free from bullying, harassment, and victimisation.
- Equal access to training, opportunity, and progression.

We promote inclusive service delivery through specialist services such as **GEODEC Sense** (neurodivergent/sensory-friendly design) and **GEODEC AgeWell**.

7. Community, Social Value & Local Engagement

GEODEC Limited supports local communities in compliance with social value and procurement standards.

We will:

- Use local labour, suppliers, and subcontractors where feasible.
- Support skills development, apprenticeships, and trade training.
- Provide social value contributions where required for public-sector projects.
- Offer accessible services for vulnerable groups through GEODEC AgeWell.
- Work respectfully in residential and community areas, minimising disruption.

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8. Supply Chain Responsibility & Modern Slavery

Under the Modern Slavery Act 2015, GEODEC Limited will:

- Conduct due diligence checks on subcontractors and suppliers.
- Refuse to work with anyone involved in forced labour, child labour, or exploitative practices.
- Maintain transparent payment practices, ensuring prompt and fair payment.
- Require subcontractors to adhere to GEODEC Limited's ethical and safety policies.

Modern Slavery concerns will be escalated immediately to senior management.

9. Training, Competence & Development

We will ensure all staff and subcontractors are trained and competent to work safely, legally, and professionally.

Training includes:

- · Health and safety awareness
- COSHH training
- Manual handling
- Working at height
- Equality & diversity awareness
- Anti-bribery and modern slavery
- NVQ and trade progression support

Training records will be maintained and updated.

10. Monitoring, Auditing & Review

GEODEC Limited will:

- Monitor compliance with this CSR Policy during works.
- Conduct internal reviews and audits annually.
- Investigate any breaches immediately.
- Update this document upon legislative change or following an incident.

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• Ensure all new operatives and subcontractors receive this policy during induction.

Non-compliance may result in removal from site, disciplinary proceedings, dismissal, or termination of contract.

11. Policy Approval

This CSR Policy is formally approved by the Director of GEODEC Limited.

Signed By:

George Ryan Matthews

17th November 2025

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