



SCOPE

Stadium Group seeks to be a good corporate citizen in all aspects of its operations and activities. To this end we have brought together a series of operating principles under the broad heading of Corporate Social Responsibility (CSR) to serve as a guide to employees in all aspects of their work for the company. The principles cover all areas of the Group's operations and have been developed with reference to the relevant codes of corporate governance and best practice, including the revised Combined Code and international statements and guidelines such as the UN Universal Declaration of Human Rights and the OECD Guidelines for Multinational Enterprises.

Taken together, these principles form our CSR policy. The policy can be divided into six main areas:

1. Ethical Business Conduct
2. Policies Specific to Employees
3. Policies Specific to the Company
4. Fair Employment Practices
5. Ethical Purchasing
- 6.

ETHICAL BUSINESS CONDUCT

We value the principles of accountability, honesty and integrity in all aspects of our business. Our policy is to conduct our business in a manner which ensures:

- fair treatment of all employees and clients
- transparency of our business policies and practices
- high standards in all matters relating to health, safety and the environment
- ethical business practices throughout our operation

We recognise that the involvement of our employees is key to the future success of the business and we have for many years adopted a policy of keeping employees fully informed on all matters affecting them. We have consistently operated a remuneration strategy that recognises both corporate and individual performance. We are also committed to best practice in employment matters, recognising the role this plays in attracting and retaining staff. To succeed in delivering the best possible service to our clients, every employee is expected to adhere to the group's core values and to uphold them in the workplace. Employees are expected at all times, to exercise the highest ethical judgement and comply with laws applicable to their duties.

POLICIES SPECIFIC TO EMPLOYEES

Compliance with Codes and Regulations

In addition to the Group's internal operating principles, employees shall adhere to all laws and regulations.

Outside Interests

The Company requires that employees avoid at all times any situation which may involve a conflict of interest between the employee and the company. In general, this does not apply to charitable work or relationships with non-profit organisations unless this has the potential to impact on the employee's normal duties.

Dealing with Customers, Stakeholder and External Parties

The Company is committed to the provision of accurate information and fairness in all its dealings with customers, stakeholders, officials and any other external party having direct business with the group.

Confidentiality

Every employee shall respect any information which is confidential to the Company including, but not limited to, trade secrets, confidential knowledge or any information concerning the process or invention used by the Group. Breaches of confidentiality may be cause for disciplinary action.

Data Protection

We are committed to complying with the data protection principles established by the 1995 EU Directive on Data Protection. This commitment applies throughout the group and in all regions in which it operates. All employees and agents of the Group are responsible for ensuring compliance with the policy. Information collected may be accessible throughout the Group but will not be disclosed to any third party in a form which identifies the individual concerned. It will not be used for marketing purposes without the individual's consent and will not be sold to third parties. Upon request, an individual will be informed of the existence, use and disclosure of his or her personal data and will be given access to that data to confirm its accuracy or amend it as appropriate. *Please refer to our IT & Data Protection Policy for full terms and conditions.*

Fair Dealings

Dealing for clients will be undertaken in an order and manner which is unquestionably fair for the client.

Malpractice

The Company actively works to deter malpractice in its workplace. The Company has detailed procedures for staff to follow in order to ensure observance of these principles. The Employee Handbook contains guidance on the value of gifts which may be given (or accepted) by staff to (or from) counterparts in the industry, the frequency with which those gifts may be made (or accepted) and how they should be recorded.

Use of Company Information / Assets

Employees shall use the company's computer systems, internet and intranet, and email systems for business use. Any employee found to have disclosed confidential information, been abusive or malicious in using these facilities, or misusing the systems in any way may face disciplinary action. The Group strictly prohibits the use of its intranet, internet or email systems for acquiring, producing or disseminating pornography or similar material, including the use of abusive language or offensive images. *Please refer to our IT & Data Protection Policy for full terms and conditions.*

Local Employment & Training Practices

We are committed to offering local employment and training opportunities in connection to the services we are delivering in the local area. We invite candidates to face to face recruitment days held within the local area. These are held at venues which are highly accessible via public transport links. This is to maximize the pool of local people which can attend who may have limited means of transportation and who are seeking employment. We do not discriminate against any characteristics as per our Equal Opportunities policy and are open to all who may wish to apply.

Ethical Purchasing

Our purchasing practices treat all suppliers with respect and fairness. This involves a consideration of the following merits of the supplier we are engaging with:

- Local people supplying locally produced/sourced products and services – e.g. local region where our services are being delivered, or within the UK
- Environmental – organisations which hold accreditations evidencing professional standards. ISO 14001 (or equivalent).
- Health & Safety – organisations which hold accreditations evidencing professional standards. For example, OHAS 18001 (or equivalent).

Organisations we work with which are found to have behaved unethically whether through our private investigations or if it is discovered the public domain will have their contracts reviewed and in some circumstances where deemed appropriate, these will be terminated.

Disciplinary Procedure

The Company has a detailed formal disciplinary procedure, full details of which are contained within the Employee Handbook and/or Company website.

POLICIES SPECIFIC TO THE COMPANY

Political Contributions

It is the Group's policy not to make contributions for political purposes. However, employees are not hindered from being politically active in their own time using their own resources.



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01/04/2018

Date

Document Information

Document Title:	Corporate Social Responsibility
Document Owner:	STM
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File Reference:	CorporateSocialResponsibility01042018

Version History

Version	Date released	Originator	Authorised	Comments