



CWA Corporate Social Responsibility Policy

(Nov 2018)



Introduction

Success in business depends on building and maintaining the trust of our clients, employees, suppliers, contractors, government agencies and other stakeholders. CWA is committed to ensuring that we consistently conduct our business with integrity and in compliance with all applicable laws and regulations.

Scope

This policy applies to CWA and may also refer to suppliers and partners.

Policy Elements

We are a responsible business that always aims to meet the highest standards of ethics and professionalism.

CWA's social responsibility falls under two categories: Compliance and Proactiveness. Compliance refers to our company's commitment to legality and willingness to observe community values. Proactiveness is the initiative to promote human rights, help communities and protect our natural environment.

Compliance

CWA shall:

- comply with the relevant laws and regulations of each country in which we operate;
- demonstrate our commitment to responsible business practice by:
 - working to a set of Business Principles
 - the development and implementation of relevant policies and procedures;
 - making informed and considered business decisions;
 - consistently delivering high quality services that meet required standards;

Business Principles

Accounting and reporting:

All financial transactions shall be recorded in accordance with generally accepted accounting practices, and the accounting records must show the nature of all transactions in a correct and non-misleading manner.

Anti-corruption:

CWA will not participate in, or endorse, any corrupt practices.

Representatives of CWA shall not offer clients, potential clients, suppliers, consultants, government agencies, or any representatives of such entities, any rewards or benefits in violation of established business practices and/or applicable laws, in order to obtain or retain business, or to gain any other improper advantage.



Employees of CWA shall not accept payments, gifts or other kinds of reimbursement from a third party that could affect or appear to affect their objectivity in their business decisions.

Money Laundering:

CWA shall not accept, facilitate or support money laundering.

Conflicts of interest:

All representatives of CWA shall conduct their private and other external activities and financial interests in a manner that does not conflict, or appear to conflict, with the interests of CWA.

Employee's private interests shall not influence, or appear to influence, their judgement or actions in performing their duties as representatives of CWA.

Company property and resources:

CWA property and resources shall be used for business objectives. They shall not be used for personal gain, fraudulent purposes, or in any other inappropriate manner.

Taxation:

CWA shall comply with the tax laws and regulations of each County in which it operates. Where tax laws do not give clear guidance, appropriate professional advice will be taken.

Proactiveness

Human rights and social welfare:

CWA shall comply with all laws and regulations pertaining to human rights and social welfare, including but not limited to, anti-discrimination, forced labour, child labour, freedom of association, workplace health & safety, working hours (including job-interest alignment and work-life balance), development opportunities, wellbeing initiatives and reward.

Environmental Principles:

CWA is committed to the minimisation, so far as is feasible, of any harmful effects the business may have on the environment.

CWA shall comply with all environmental laws and regulations and has appropriate policies and procedures in place, details of which are communicated to employees, contractors and any other relevant stakeholders.

There is no doubt that climate change is happening and that human activity is the major factor behind the change. There is a need to focus on the actions which effectively reduce emissions. That is why we have looked to improve our use of gas / electricity in our offices, and to better manage our waste disposal and recycling systems, and to actively reduce our carbon footprint caused by business travel.



CWA's environmental objectives are as follows:

- To achieve high levels of recycling throughout all business activities.
- To move towards a paper-free working environment.
- To reduce our carbon footprint by reducing, where possible, business travel. This may be achieved by investing in new technology to facilitate video conferencing meetings and / or by travelling 'smarter', e.g. car sharing, use of public transport.

Donations and aid:

We regularly support employees' individual efforts to raise money for charitable causes. In addition, CWA supports a nominated local charity each Christmas. Support is given in the form of staff time, donations and financial support.

Volunteering:

CWA will encourage its employees to volunteer. They can volunteer through programs organised internally or externally. CWA may sponsor volunteering events from other organisations.

Supporting students through work experience and work placements:

Work experience and placements can have a hugely positive impact on young people's employability and can play a significant role in attempts to reduce youth unemployment. It can:

- Break the vicious circle that many young people find themselves in, where they can't get a job because of lack of experience and can't get experience because they can't find a job.
- Provide young people with an understanding of the structure and reality of working life, which is crucial if they are to secure and sustain employment.
- Provide feedback and coaching to enable young people to develop skills, including those required in specific jobs and sectors.
- Help young people to make informed choices about their futures and allow them to learn more about specific industries, organisational cultures and job roles.
- Allow young people to gain experience of working with people, enhancing their social and communication skills, and awareness of how to present themselves and behave in a work context.
- Provide opportunities to learn about recruitment processes (such as how to do job interviews and how to apply for a job).
- Provide a positive experience of the world of work that builds the young person's confidence and motivation.

CWA recognise the above benefits and will continue to maintain links with local colleges and universities, and where possible, accommodate short term work experience requests.



Corporate Social Responsibility for our suppliers

CWA's commitment to our Corporate Social Responsibilities will be reflected and promoted in business policies, decisions and actions.

In the same spirit we want our suppliers to adopt similar principles. We expect our suppliers to:

- Comply with the laws and regulations of the countries where the supplier operates;
- Ensure that their employees, contractors and other partners are adequately trained and work to the appropriate standards, in line with relevant laws and regulations;
- Have appropriate policies and procedures in place to demonstrate compliance across all business activities.
- Participate in CWA supplier audits in order to verify compliance of their products and processes.

Continuous Improvement

CWA will:

- Review the CSR policy on an annual basis, and thus increase its potential impact.
- Educate current and future employees about the policy and how to embody it into their own job function.
- Engage our employees in the process of developing, implementing and managing the CSR policy which in turn will foster a sense of ownership in and responsibility for the success of the policy.

Enquiries

CWA welcome questions from our employees and trusted third parties regarding this policy.

Enquiries should be made by email to the Finance Director, **Zoe Wyles** at zw@cwa.co.uk