

2019

Corporate Social Responsibility Policy



As a responsible corporate citizen our prime responsibility is to our clients and to our staff; on behalf of our owners we therefore seek to operate an efficient and profitable business. We thereby allow the firm to continue to support many families and individuals as well as paying directly and indirectly large amounts by way of tax to support the activities of central and local governments.

This Code sets out the standards we expect from our employees in their internal and external dealings with colleagues, clients, stakeholders, third parties and the wider community in which we operate.

1. Basic Standards of Conduct

- We will conduct every aspect of our business with honesty, integrity and openness, respecting human rights and the interests of our employees, clients and third parties.
- We will respect the legitimate interests of third parties with whom we have dealings in the course of our business.
- We will not promise more than we can reasonably deliver or make commitments we cannot or do not intend to keep.
- We are committed to adhering to the rules and principles of the Financial Conduct Authority and other relevant legislation.

2. Corporate Governance

- NW Brown will conduct its operations in accordance with the principles of good corporate governance including honesty and integrity, transparency and openness by directors in their dealings with all stakeholders, responsibility and accountability.
- We will provide timely, regular and reliable information on the business to our Group Board, Company Boards, shareholders and employees.

3. Business Integrity

- We aim to develop strong relationships with those with whom we have dealings, based on mutual trust, understanding and respect.
- In these dealings, we expect those with whom we do business to adhere to business principles consistent with our own.
- NW Brown's accounting and other records and supporting documents must accurately describe and reflect the nature of the underlying transactions.
- NW Brown will not facilitate, support or tolerate or condone any form of money laundering or bribery.
- To ensure that our business is run in an ethical and effective manner we will maintain internal systems and controls as required to achieve that objective.

4. Clients

- NW Brown is committed to providing safe, value for money, high quality, consistent, accessible and reliable services to its clients.

- All employees are expected to behave respectfully and honestly in all their dealings with clients and the general public in accordance with the Staff Handbook and Appendices.
- Employees will be made aware that they hold a position of trust and that they must at all times maintain the highest standards of personal conduct towards clients.

5. Employees and Personal Conduct, we are committed to:

- Developing a workforce where there is mutual trust and respect, free from bullying and harassment, where every person feels responsible for the performance and reputation of our company.
- Recruiting, employing and promoting employees on the basis of objective criteria and the qualifications and abilities needed for the job to be performed in line with our Equal Opportunities Policy.
- Providing mechanisms whereby employees can raise legitimate concerns confidentially regarding malpractice and ensuring no one will be victimised for a report made in good faith.
- All employees are expected to behave in accordance with the principles set out in the Staff Handbook and Appendices.
- Employees are expected to protect and not misuse company assets such as buildings, vehicles, equipment, cash and procurement cards.
- Employees are expected to use e-mail, internet, social media, IT and telephones in a manner appropriate for business purposes in line with the principles contained in the Staff Handbook and Appendices.
- Information received by anyone in the course of his or her employment must not be used for personal gain or for any purpose or action other than that for which it was given. Where confidential information is obtained in the course of business that confidentiality must be respected.

6. Bribery, Improper Payments and Gifts

- NW Brown complies with the requirements of the Bribery Act 2010. No employee or individual or business working on our behalf must accept or give a bribe, a facilitation payment or other improper payment for any reason. This applies to transactions with government officials, any private company or person. It also applies whether the payment is made or received directly or through a third party.
- Gifts and entertainment are covered by the policies in the Staff Handbook and Appendices to which all employees are required to comply.

7. Conflicts of Interest

- Whilst we respect the privacy of our employees, all NW Brown employees are expected to avoid personal relations, activities and financial interests which could conflict with their responsibilities to NW Brown.
- NW Brown employees must not seek gain for themselves or others through misuse of their positions or company property.
- All actual and potential conflicts (including those arising from the activities or interests of close relatives or partners) should be disclosed to and discussed with an employee's line manager.
- NW Brown maintains a conflict of interest register.

8. Health and Safety

- We are committed to creating and maintaining a safe and healthy working environment for our employees, clients and the community.
- Our commitment to ensuring the safety and security of our employees is set out in our Staff Handbook and Appendices.

9. Supply Chain

- We will seek to work with our suppliers to develop long-term meaningful relationships to benefit both parties with the aim of improving the quality, environmental performance and sustainability of goods and services.

- Whilst we are committed to obtaining and retaining competitive goods and services we will at the same time seek to use local suppliers to support the local business community.

10. Community Involvement

- Our operations touch members of communities daily, whether as clients, neighbours, employees, businesses or residents.
- Where appropriate we will seek to sponsor and support local groups, activities and charities throughout the year.
- We encourage our employees to participate in wider industry and social organisations.

11. The Environment

- NW Brown is committed to monitoring and managing its environmental impact.
- We encourage employees to use recycle bins and reduce energy and water waste where possible.
- NW Brown offers all employees an opportunity to partake in an interest free bike loan to encourage reduction of car usage.

For more information, please contact us on 01223 720 233.