



Corporate Social Responsibility Policy

Controlled Document	
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Review and Amendments

Below is information relating to the periodic review and amendments made to this document following its original issue.

ACTIONS UNDERTAKEN	DATE	INITIAL
CID Products LLP replaced with CID Trading Ltd	14.03.2023	SE
Reviewed	14.03.2024	SE

This Corporate policy includes the following:

**CORPORATE GOVERNANCE
ANTI CORRUPTION AND ANTI-BRIBERY
ANTI-SLAVERY AND HUMAN TRAFFICKING
DISCRIMINATION, EQUALITY AND HUMAN RIGHTS
ENVIRONMENTAL POLICY**

CORPORATE GOVERNANCE

CID Trading Ltd are committed to ensuring that our business is conducted in all respects according to rigorous ethical, professional and legal standards.

All the laws that regulate and apply will be complied with

CID Trading Ltd endeavour to ensure that stakeholders have confidence in the decision-making and management processes of the service provided, by the conduct and professionalism of all staff. CID Trading Ltd do this by continually training and developing our staff.

All groups and individuals with whom CID Trading Ltd have a business relationship will be treated in a fair, open and respectful manner.

Competition will be reasonable and based upon the quality, value and integrity of the services being supplied.

Feedback on performance will be actively sought from customers and CID will ensure that customer comments are analysed, responded to and where appropriate, acted upon.

An Action Plan will be developed to ensure continuous improvement is achieved

The elements of this statement cover our approach and principles in dealing with the customers, suppliers and the local community within which we operate. This is in an effort to support these entities while reducing our procurement, transport, water and energy usage, and other business usage and thereby to reduce our carbon footprint and environmental impact.

Local Community

CID Trading Ltd will ensure that our work with the local community involves:

- Working and supporting local and national charities
- Encouraging volunteer work in community activities
- Supporting local schools

Clients

- CID Trading Ltd will ensure that we deal responsibly, openly and fairly with clients and potential clients by:
- Ensuring that all our advertising and documentation about the business and its activities is clear, informative, legal, decent, honest and truthful
- Being open and honest about our products and services and advising clients of our commitment to our social responsibilities
- Avoiding pressure selling techniques
- Ensuring that if something goes wrong we will acknowledge the problem and deal with it
- Listening to our clients so that this can help us improve the products and services we offer to them

- Ensuring that we benchmark and evaluate what we do in order to constantly improve our competitive edge in the marketplace.

Staff

- Staff at CID Trading Ltd will be fairly treated in accordance with comprehensive HR policies laid down and made available to all staff via the staff handbook
- Working hours are as agreed in the contract of employment and involve a 5 day week with working hours normally of between 8 and 10 hours per day plus statutory breaks.

Suppliers

CID Trading Ltd will also ensure that we deal responsibly, openly and fairly with suppliers by:

- Ensuring that we use local suppliers as much as possible
- That we will endeavour to pay on time
- Not expecting any discounts which would have a detrimental effect on their business

ANTI CORRUPTION AND ANTI BRIBERY

1.1. It is the Company's policy to conduct all of its business in an honest and ethical manner. The Company takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates, and to implementing and enforcing effective systems to counter bribery.

1.2. The Company will uphold all laws relevant to countering bribery and corruption and is bound by the laws of the UK, including the Bribery Act 2010, in respect of its conduct both at home and abroad. Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if the Company is found to have taken part in corruption it could face an unlimited fine, be excluded from tendering for public contracts and face damage to its reputation. The Company therefore takes its legal responsibilities very seriously.

1.3. In this policy third party means any individual or organisation you come into contact with during the course of your work for the Company, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives, officials and politicians and political parties.

1.4. This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with the Company, wherever located (collectively referred to as workers in this policy).

1.5. You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the Company or under its control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

1.6. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties. The giving or receipt of gifts is not prohibited, if the following requirements are met:

(a) it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;

- (b) it complies with local law;
- (c) it is given in the Company's name, not in your name;
- (d) it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- (e) it is appropriate in the circumstances - for example, in the UK it is customary for small gifts to be given at Christmas time;
- (f) taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time; and
- (g) it is given openly, not secretly.

Gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of the Compliance Officer.

1.7. The Company appreciates that the market practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

1.8. It is not acceptable for you (or someone on your behalf) to:

- (a) give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- (b) give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- (c) accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- (d) accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- (e) threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- (f) engage in any activity that might lead to a breach of this policy.

1.9. The Company does not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. Kickbacks are typically payments made in return for a business favour or advantage. If you are asked to make a payment on the Company's behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with the Compliance Officer.

1.10. The Company only makes charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the Charity Committee and the Compliance Officer.

1.11. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the Company or under the Company's control. As such, you must ensure that you read, understand and comply with this policy and must notify the Compliance Officer as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

1.12. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

1.13. The Company must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties. You must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to review by the Compliance Officer. You must ensure all

expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

1.14. You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with the Compliance Officer. Concerns should be reported by following the procedure set out in our Public Interest Disclosure policy.

1.15. It is important that you tell the Compliance Officer as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

1.16. Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

1.17. The Company is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your Line Manager and/or the Compliance Officer immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the Grievance Procedure.

1.18. Training on this policy forms part of the induction process for all new employees and other workers. All existing employees and workers will receive regular, relevant training on how to implement and adhere to this policy. The Company's zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of its business relationship with them and as appropriate thereafter. Frequently asked questions about this policy can be found in the Appendix.

1.19. The board of directors has overall responsibility for ensuring this policy complies with the Company's legal and ethical obligations, and that all those under the Company's control comply with it. The Compliance Officer has primary and day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness and regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption. Workers are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Compliance Officer.

1.20. This policy does not form part of any employee's contract of employment and it may be amended at any time.

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

- CID Group, has zero tolerance to slavery and human trafficking and is committed to ensuring that there is no place for modern slavery or human trafficking in our supply chains or in any part of our business. We do not knowingly trade with or support any business involved in these practices.

- The company follows a due diligence process in regard to the requirements the Modern Slavery Act of 2015, through our own 'supply chain vetting programme' in addition to working with third party auditing companies such as ET2C as part of our initiative to identify and mitigate risk. In relation to that of human trafficking and slavery we operate a range of policies and procedures within the supply chain to ensure we are not supporting it in any way.
- Our Directors & relevant management team have created a strategy, within our own organization in which we endeavor to follow the guidelines and responsibilities set out in the Modern Slavery Act 2015.

DISCRIMINATION, EQUALITY AND HUMAN RIGHTS

CID Trading Ltd are committed to eliminating unlawful discrimination and promoting equality and diversity in our own policies, practices and procedures and in influencing others to do the same in our dealings with staff, clients, and third parties.

We aim in accordance with the UK Human Rights Act 1998, to treat everyone equally, with the same attention, fairness, dignity and respect, regardless of their age, disability, gender, marital status, race, racial group, colour, ethnic or national origin, nationality, religion, belief or sexual orientation,

We are committed to complying in both letter and spirit with all anti-discrimination legislation and associated codes of practice in force either now or in the future.

Forms of Discrimination:

The following are the kinds of discrimination, which are against the firm's policy:

- (a) Direct discrimination, where a person is treated less favourably on the basis of a ground which is unlawful;
- (b) Indirect discrimination, where a provision, criterion or practice which seems to be lawful would create a significant disadvantage for a substantial number of one group of persons compared with other persons on the basis of an unlawful ground unless that provision, criterion, or practice is objectively justified by a legitimate aim and the means of achieving that aim are appropriate and necessary;
- (c) Victimisation, where someone is treated less favourably than others because he or she has taken action in respect of discrimination on unlawful grounds;
- (d) Harassment, when unwanted conduct related to any unlawful ground takes place with the purpose or effect of creating an intimidating, hostile, degrading, humiliating, or offensive environment for any person. This is not limited to physical acts and may include verbal and non-verbal communications and gestures.

Fairness in Employment and Training

As an employer, we will treat all staff and job applicants equally and fairly and not discriminate unlawfully against them. We will ensure, for example, that arrangements for recruitment and selection, terms and conditions of employment, access to training opportunities, access to promotion and transfers, grievance and disciplinary processes, demotions, selection for redundancies, dress code, references, bonus schemes, work allocation and any other employment related activities do not constitute unlawful discrimination against any person or group of persons.

We recognise the value of a diverse workforce and will take steps to ensure that:

- (i) we recruit from the widest pool of qualified candidates possible;
- (ii) employment opportunities are open and accessible to all on the basis of their individual qualities and personal merit;
- (iii) selection criteria and processes do not discriminate unjustifiably on any of the unlawful grounds other than where we are exercising permitted positive action;
- (iv) all recruitment agencies acting for the Firm are aware of this policy and act in accordance with it.

Conditions of service

We will treat all staff equally and endeavour to create and maintain a working environment which is free from discrimination and harassment and which respects, wherever possible, the differing backgrounds and beliefs of employees. Terms and conditions of service for employees will comply with anti-discrimination legislation. The provision of any staff benefit such as working hours, leave and maternity leave arrangements, performance appraisal schemes, bonus schemes, dress codes, or any other conditions of employment will not discriminate against any employee on any unlawful grounds. Where it is possible and reasonable to do so, CID Trading Ltd will endeavour to provide appropriate facilities and conditions of service which take into account the specific needs of employees which arise from their ethnic or cultural background; gender; responsibilities as carers; disability; religion or belief; or sexual orientation.

Promotion and Career development

Promotion within the Firm will be made without reference to any of the unlawful grounds and will be merit based. The selection criteria and processes for recruitment and promotion will be regularly reviewed to ensure that there is no unjustifiably discriminatory impact on any particular group.

Although positive action measures may be taken in accordance with the relevant anti-discrimination legislation to encourage under-represented groups to apply for promotion opportunities; recruitment, or promotion to all posts will be based entirely on merit. All employees will have equal access to training and other career development opportunities appropriate to their experience and abilities. However, the Firm may take appropriate positive action measures where permitted or required by anti-discrimination legislation to provide special training and support for groups which are under-represented in the workforce and encourage them to take up training and career development opportunities.

Contractors, Suppliers, Agents, and Third Parties

Any decisions regarding the suitability of suppliers and contractors, agents or other third parties to provide goods or services to us or to our clients will be made in accordance with this policy and not on any of the unlawful grounds. Failure of any supplier, contractor, agent or other third party or of any of its staff to adhere to the principles set out in this policy or to carry out any discrimination on unlawful grounds will be investigated and appropriate action taken which may include immediate termination of our relationship with them.

Clients

We are free to decide whether to accept instructions from any particular client, but any refusal to act or decision to terminate our services will not be based upon any unlawful grounds. We will not accept

instructions from clients who contravene this policy. Where we are required by anti-discrimination legislation to do so and where it is reasonable we will make adjustments to our own working practices to accommodate the needs of any person falling under the appropriate antidiscrimination legislation. We will advise all clients of this policy on taking instructions from them. Where tenants or occupiers make requests under antidiscrimination legislation we will advise clients regarding the reasonableness of these requests; and where the client chooses not to comply with the request and we believe that non-compliance to be unlawful we will make our position clear to all parties in writing and reconsider whether to terminate our services.

Promoting Equality and Diversity

Just as we are committed to anti-discriminatory practices within our organisation we are also committed to promoting equality and anti-discrimination in areas in which we have influence. All staff will be informed of this policy and will be provided with training appropriate to their needs and responsibilities. All those who act on our behalf will be informed of this policy and will be expected to act in accordance with it when conducting business on our behalf. In all our dealings, including those with tenants, suppliers, contractors and recruitment agencies, we will seek to promote the principles set out in this policy.

Implementing the Policy

Responsibility:

Ultimate responsibility for implementing the policy rests with Ted Soulsby. All our staff are expected to be aware and take notice of the provisions of our antidiscrimination policy and are responsible for ensuring compliance with it when fulfilling their duties or representing the Firm. Acts of discrimination or harassment on any of the unlawful grounds or failure to comply with this policy by our staff will result in disciplinary action. Acts of discrimination or harassment on any of the unlawful grounds by those acting on behalf of the Firm will lead to appropriate action including termination of employment or services where appropriate. Acts of discrimination or harassment on any of the unlawful grounds by clients or requests by clients for us to carry out any act of discrimination or harassment on any of the unlawful grounds will lead to termination of our service agreement with them.

Complaints of discrimination

We will treat seriously, and, where appropriate, will take action regarding all complaints of discrimination or harassment on any of the unlawful grounds made by employees, clients, tenants, contractors or other third parties. All complaints will be investigated in accordance with our grievance or complaints procedure and the complainant will be informed of the outcome.

Questionnaires

We will endeavour to fully and promptly answer any statutory questionnaires served on us under the provisions in the Equality Act 2010 and any similar or future legislation.

Monitoring and review

The policy will be monitored and reviewed on a regular basis (and in any event at least annually) to measure its progress and judge its effectiveness. In particular, we will record and consider the number and outcome of complaints of discrimination made by staff, clients, tenants, contractors and other third parties

and the details of any potentially unlawful grounds for discrimination involved in any disciplinary action taken against employees. This information will be used to review the progress and impact of the Anti-Discrimination policy. Any changes required will be made and implemented.

ENVIRONMENTAL POLICY

Protection of the environment in which we live and operate is part of CID Trading Ltd's values and principles and we consider it to be sound business practice and one of our key responsibilities.

CID Trading Ltd will ensure that the Company reduces environmental impact of the Company and are committed to:


- Comply with all relevant environmental legislation, regulations and approved codes of practice.
- Protecting the environment by striving to prevent and minimise our contribution to pollution of land, air, and water
- Reduce all transportation requirements wherever possible.
- use vehicles that are regularly serviced and checked with regards to their emission levels and economically use their fuel
- Source and buy goods locally to save fuel costs wherever possible
- train and promote environmental awareness among our employees and encourage them to work in an environmentally responsible manner,
- Reduce waste through re-use and recycling and by purchasing recycled, recyclable or refurbished materials where these alternatives are economical and suitable,
- Promote efficient use of materials and resources throughout our facility including water, electricity, raw materials and other resources, particularly those that are non-renewable,
- Avoid unnecessary use of hazardous materials and products, seek substitutes where feasible, and take all reasonable steps to protect human health and the environment when such materials must be used, stored and/or disposed of where required by legislation or where significant health, safety or environmental hazards exist.
- Communicate our environmental commitment to suppliers, clients, customers and the public and encourage them to support it,
- Strive to continually monitor and improve our environmental performance and minimise the social impact and damage of activities by periodically reviewing our environmental policy in light of our current and planned future activities.

The operational and ultimate responsibility for the commitment to our corporate social responsibility principles lies with the Directors of CID Trading Ltd.

Every employee of the business is required to give their full co-operation to the above principles in their activities at work.

The effectiveness of the Policy Statement will be monitored and reviewed annually by the Directors to ensure the Company's continuing compliance with any relevant legislation and to meet new business requirements and to identify areas in need of improvement. We will also ensure that all changes are brought to the attention of employees as necessary.

THE SIGNATURE BELOW DEMONSTRATES THAT THIS DOCUMENT HAS BEEN AUTHORISED:

Company Name	CID Trading Ltd
Document Name	Corporate Social Responsibility Policy
Signed	
Print:	Ted Soulsby
Position	Managing Director
Date:	14/03/2024
Review Date:	14/03/2025