

Ethical, Environmental & Sustainability Policy

Statement of Intent

As a socially responsible company we are committed to conducting all of our business activities ethically and in a way that minimises negative impacts on the environment. With this aim, the management and staff of Class Networks have adopted the following Ethical, Environmental & Sustainability Policy.

Principles

- 1. To, as a minimum, comply with all applicable legislation, regulations and codes of practice.
- 2. To integrate ethical, environmental & sustainability considerations into all our business decisions.
- 3. To ensure that all staff are fully aware and involved in implementing this policy.
- 4. To make customers, suppliers and other stakeholders aware of our policy and encourage them to adopt sound sustainable management practices.
- 5. To review this policy annually and look continually for opportunities to improve our performance.

Ethics

We will always act responsibly and adopt good practices in our dealings with our customers. To ensure this is achieved we have developed a Code of Practice & Dispute Resolution document that defines the key elements of our commercial relationship with our customers. This code is a regulatory requirement and is lodged and approved by Ofcom, the industry regulator. We have also developed a Sales & Marketing Code of Practice, which defines the behaviour to be expected of our sales and marketing people. These codes are additional to our compliance with all applicable laws and are available on our web site or free of charge in other formats on request.

Environment & Sustainability

We are committed to pursue appropriate environmental practices beyond that stipulated in environmental regulations and laws. In all our activities and where practical we will:

- 1. recycle office waste or dispose of it in an appropriate manner;
- 2. improve energy efficiency in the work place, using energy efficient equipment, tools and products;
- 3. include environmental considerations when selecting partners and suppliers;
- 4. where possible, make purchases from renewable sources;
- 5. select and maintain business vehicles so as to minimise emissions;
- 6. schedule and combine activities in geographical areas to ensure that the effect of transportation of personnel and equipment on the environment is minimised;
- 7. encourage the use of public transport for business journeys rather than cars;

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- 8. ethically source products for our office supplies;
- 9. regularly review the environmental impacts of the business, and constantly seek opportunities for continual improvement and prevention of pollution;
- 10. encourage our customers and business contacts to use electronic methods to communicate and conduct business. E.g. use of the internet for email, order forms, invoices and billing reports to significantly reduce paper usage;
- 11. work to a clear set of environmental targets and measures set specifically for our organisation which will at the very least meet with environmental regulations, laws and codes of practice;
- 12. agree and communicate a clear statement of intent/code of practice regarding our activities and aims within the organisation at all levels to ensure that everyone in the organisation complies with the requirements set.
- 13. evaluate short, medium and long term progress and action failures as they arrive to meet best practice.

Accountability

Class Networks Board of Directors is ultimately accountable for our Ethical, Environmental & Sustainability Policy, any related internal activities are coordinated through the Class Networks Staff Committee. Activities are routinely monitored at senior management meetings to ensure compliance and continual improvement. Class Networks agents and our service partners are provided with copies of our codes and policies and are encouraged to monitor their activities and provide feedback.

Policy Maintenance

This policy will be reviewed on an annual basis in December to:

- 1. Confirm current/applicable regulations.
- 2. Undertake a Compliance and Risk Assessment.
- 3. Amend this policy and/or working practices.

End of Document

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