



## Equality and Diversity Policy

At All Steels Trading we celebrate the diversity that exists amongst our workforce and we are committed to creating a working environment in which every employee can take full part.

Our aim is to develop, promote and deliver both employment and training opportunities without discriminating on the basis of race, disability, age, gender, religion or belief, or sexual orientation.

We believe that our company will be a better, more creative and innovative place to work as a result of managing our workforce in a way that gets the best from their diversity: To value their different perspectives and backgrounds to integrate fairness and equality into every aspect of our employment practices.

We will implement this policy by ensuring that:

1. All staff and visitors do enjoy a safe working environment free from discrimination, harassment and bullying.
2. All employees will have equal access to all services provided by the company.
3. All employees will have equal opportunities to develop their career through training and promotion opportunities.
4. Employees should reflect the diversity of talent and skills from local and national pools.
5. We take positive action to redress inequalities and discriminatory practice.
6. We recruit, attract, develop and retain the most talented people, valuing the varied skills and experiences people bring to the company, thus ensuring our workforce to be representative of our community.

A handwritten signature in black ink, appearing to read 'Laurence McDougall', is written over a light grey circular stamp.

Laurence McDougall  
(Managing Director)

Date: 10th September 2015



## Anti-bribery Policy

At All Steels Trading it is our policy to conduct all of our business in an honest and ethical manner. We take a zero tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

This policy applies to all individuals working at all levels and grades, including senior managers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, and trainees.

This policy covers: • Bribes; • Gifts and hospitality; • Facilitation payments; • Political contributions; • Charitable contributions.

1. Employees must not engage in any form of bribery either directly or through any third party.
2. Employees must not offer or give any gift or hospitality, which could be regarded as illegal or improper to any public employee or government official unless approved in writing by the employee's manager.
3. Employees must not accept any gift or hospitality from our business partners if it is in cash or it is suggested that a return favour will be expected.
4. Facilitation payments must not be paid. Where there is a risk to the personal security of the employee then any payments made must be kept to a minimum, a record of this payment must be made and it should be reported to your manager.
5. As a business we do not make donations whether in cash or support to any political parties or candidates.
6. Charitable support and donations are acceptable however employees should be careful to ensure that these donations are not used as a scheme to conceal bribery. All donations should be publicly disclosed.

We openly encourage employees to raise any concerns they may have or suspicion of malpractice at the earliest possible stage. We are 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.

A handwritten signature in black ink, appearing to read 'L. McDougall', is written over a light blue horizontal line.

Laurence McDougall  
(Managing Director)

Date: 10th September 2015



## Code of Ethics and Conduct

At All Steels Trading we pride ourselves on the competency and high standard of work our employees achieve. However, there are certain standards that we expect our employees to work to and there are disciplinary procedures in place if these standards are not met.

We expect all employees whilst working and in their personal lives to abide by the law and notify the organisation should they be convicted of a criminal offence.

All employees must ensure that they are competent to undertake the work proposed to them. We expect employees to not only be qualified but to enhance this through skills and knowledge that can only be gained through experience. If an employee believes that they are not competent to undertake a task set to them then they must make this known to their manager before the work is started.

We expect all employees to respect and adhere to the rules set out to them by the company. Employees should co-operate with customers/clients and their fellow employees to the terms of their contract having regard for the effect their professional activities may have on others.

We expect all employees to agree to the terms of their individual contracts and highlight any lack of contractual clarity they may face. Before taking on any individual work for a customer/client they should ensure that the cost of the work and contract are agreed in writing with the company to prevent any disputes once the work has been completed.

Failing to adhere to the above will result in disciplinary actions, which could lead to a termination of the employee's contract.

A handwritten signature in black ink, appearing to read 'Laurence McDougall', written over a light grey circular stamp.

Laurence McDougall  
(Managing Director)

Date: 10th September 2015