
Corporate Social Responsibility Policies Economics for the Environment Consultancy Ltd (eftec)

Contents

1. Corporate Social Responsibility	2
2. Sustainability	3
2.1 Environmental Legislation	3
2.2 Energy, water and material use	4
2.3 Office waste and recycling	4
2.4 Travel	4
2.5 Offsetting Overall Carbon Emissions	5
3. Honest and Ethical Behaviour	5
3.1 Conflicts of interest	5
3.2 Fraud & Dishonesty	5
3.3 Whistleblowing	5
3.4 Anti-bribery	6
4. Modern Slavery	7
4.1 What is modern slavery?	8
4.2 Who is most at risk?	8
4.3 Who is required to comply?	8
4.4 eftec's approach to anti-slavery	8
5. Mandatory training	8
6. Requirements from sub-contractors	9
7. Implementation of policy	9

1. Corporate Social Responsibility

We recognise that we must integrate our business values and operations to meet our own expectations and those of our stakeholders. They include our customers, employees, investors, suppliers, the local community, and the environment.

- We recognise that our social, economic and environmental responsibilities to these stakeholders are integral to our business. We aim to demonstrate these responsibilities through our actions and within our business policies;
- We take seriously all feedback that we receive from our stakeholders and, where possible, maintain open dialogue to ensure that we fulfil the requirements outlined within this policy;
- We have an open and honest approach to communicating our strategies, targets, performance and governance to our stakeholders; and
- The Managing Director is responsible for the implementation of this policy and will make the necessary resources available to realise our responsibilities. The responsibility for our performance on this policy rests with all employees throughout the company.

Our focus:

- We aim for a high level of business performance while minimising and effectively managing risk, ensuring that we uphold the values of honesty, partnership and fairness in our relationships with all our stakeholders;
- Where possible/appropriate, we shall support the development of our staff, interns, volunteers and external stakeholders through training courses and make our facilities available to our business partners, as far as is possible;
- Our contracts will clearly set out the agreed terms, conditions and the basis of our relationship with our clients and suppliers and will operate in a way that safeguards against unfair business practices;
- We shall encourage suppliers to adopt responsible business policies and practices;
- We will register and resolve customer complaints in accordance with our Quality Management Policy (attached);
- We shall support and encourage our employees to help local community organisations and activities and charities, including pro-bono or discounted work;
- Where appropriate, we shall work with local apprenticeship schemes to assist young people in choosing their future careers;
- We shall operate an equal opportunities policy for all present and potential future employees and will offer our employees clear and fair terms of employment and provide resources to enable their continual development (see attached Employment - Equality & Diversity Policy);
- We shall maintain a clear and fair employee remuneration policy;
- We shall provide safeguards to ensure that all employees, interns and volunteers of whatever nationality, colour, race or religious belief are treated with respect and without sexual, physical or mental harassment;
- We shall provide, and strive to maintain, a clean, healthy and safe working environment in line with our Health and Safety policy and safe systems of work; and
- We shall implement environmental policies and objectives as part of the business planning cycle.

2. Sustainability

We, at eftec, take great care in practising what we advise. We are committed to reducing the impact of our activities – and those of our suppliers - on the environment. This policy statement is available to all our staff members, clients, suppliers and interested parties. It is reviewed on an at least annual basis and amended where appropriate.

As an office-based company with no direct impact on land use, we do not have a biodiversity or conservation policy as such, but we apply the following objectives:

- Compliance with all relevant environmental legislation
- Identification and management of environmental risks and hazards and prevent pollution to land, air & water
- Reduction of emissions to air resulting from our activities (e.g. by minimising travel)
- Ensure the efficient use of natural resources through waste elimination, minimisation and resource efficiency and where waste production is unavoidable, implement practices to divert waste from landfill, where practicable
- Promote the co-operation of all our employees through training, consultation and awareness raising
- Monitoring our environmental impacts through annual environmental reports, this allows us to assess relevant environmental risks, offset unavoidable emissions, and use the results as a basis for continual improvement
- Encouraging our subcontractors and suppliers to utilise sound environmental practices and sustainable resources
- We pay the London living wage to our office cleaner and interns, and communicate our environmental and social objectives to our clients and customers, including through sharing this policy and through our Corporate Social Responsibility policy

Our company principles in respect of sustainability form an integral part of our quality management system. We are not only committed to providing services that reduce costs to ourselves and to our clients, but also to improving sustainability through regular review, monitoring and feedback.

We aim, whenever possible, to spend our team away- days on environmental projects, for example: in 2006 we built release pens for a vole conservation project in Oxfordshire; in 2008 we worked on the building of a house out of discarded newspapers as part of an environment-art project; in 2013 we volunteered at Adelaide Local Nature Reserve to build new and repair existing walking paths); and in 2019 we volunteered for a day to carry out maintenance work on a pond and fences at Waterlow Park in Camden.

2.1 Environmental Legislation

We are aware of – and compliant with – current environmental legislation in the UK:

- The Waste (England and Wales) Regulations 2011
- The Hazardous Waste (England and Wales) Regulations 2005
- Environmental Protection (Duty of Care) Regulations 1991
- The Environment Act 1990
- The Control of Pollution (Amendment) Act 1989
- The Controlled Waste Regulations 1992
- The Controlled Waste (Amendment) Regulations 1993

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- Environmental Protection Act 1990
 - Environment Act 1995
 - The Waste Electric and Electronic Equipment (WEEE) Regulations 2013

2.2 Energy, water and material use

We switch off all electrical equipment (computers, monitors, printers) when not in use for a long period of time during the day and always overnight. We use low-energy fluorescent bulbs, and avoid over-heating the offices, turning on the heating only when necessary. We use a renewable-only electricity supplier.

Water use in our office building is metered and managed by the Landlord. Use in our demised space is limited to the kitchenette. WCs and two showers are located within the common parts of the building.

We do not print any correspondence or documentation unless we have to. When we do print, we print double-sided (mostly 2 pages per sheet). Any paper printed on one side only is generally used as scrap paper and then recycled. The paper we use is always based on 100% recycled materials.

Whenever possible, our choice for food, refreshments and cleaning products is for recycled, environmentally-friendly, organic and/or fair trade options.

2.3 Office waste and recycling

We aim to:

- continuously improve our environmental performance particularly with regards to our recycling and re-use of paper.
- Where possible use recycled or ecologically friendly paper.
- Use 'waste' paper for notepads unless confidentiality may be compromised.
- Reduce our consumption of resources and improve the efficiency of those resources by printing double sided and/or 2 sheets per page where practicable.
- Manage waste generated from our business operations according to the principles of reduction, re-use and recycling
- Recycle all paper products, ink or toner cartridges.
- Comply as a minimum with all relevant environmental legislation as well as other environmental requirements.

We recycle glass bottles, aluminium cans, cardboard, newspaper, toner cartridges, magazines and office paper through the collection service provided by First Mile Recycling or other companies as relevant.

2.4 Travel

We try to minimise our travel impact by allowing frequent home working for all staff, using trains instead of flying for UK mainland and possible European destinations, using conference call (audio and video) facilities wherever possible and only setting up in-person meetings only when not . If travelling for meetings, we try to combine several meetings at a destination.

To offset the carbon emissions due to work-related travel, we purchase carbon offsets on an annual basis (see Section 2.5).

2.5 Offsetting Overall Carbon Emissions

We offset any carbon emissions we cannot avoid through a biodiversity-friendly voluntary offset purchased from the World Land Trust¹. Our emissions are calculated in eftec's annual environment report and cover emissions from our office energy and paper use, and travel emissions. Our latest Carbon Offset Certificate can be found on our website: <https://www.eftec.co.uk/core-values>

3. Honest and Ethical Behaviour

This policy sets out eftec's commitment to conduct all aspects of its business in an honest, open and ethical manner. Our clients, suppliers and other stakeholders are entitled to expect us to comply fully with all our legal responsibilities, as well as with our core business values and ethical principles.

eftec seeks to promote a culture of honesty and integrity in all its dealings and will not tolerate acts of fraud, dishonesty, bribery, corruption, or theft of assets or data from the business. It is also committed to ensuring that neither the Company's integrity nor reputation is put at risk. We achieve this through the effective use of quality management systems and processes to help us identify and manage:

3.1 Conflicts of interest

Potential conflicts of interest are evaluated at tender stage and/or prior to signing project contracts, and are reported to eftec's Founding Director, Ece Ozdemiroglu. eftec also expects to be advised by clients and subcontractors of any relationships which may potentially - or do - give rise to a conflict of interest.

eftec is committed to being open and transparent about any conflicts of interest. We maintain a register to record details of any such interests and implications are considered by our senior management team.

3.2 Fraud & Dishonesty

Acts of fraud, dishonesty, bribery, corruption, theft of assets or improper disclosure of confidential information will not be tolerated, whether committed by employees, suppliers, third party contractors or partners working for and on behalf of eftec. eftec will, therefore, treat these issues very seriously and expects all occurrences to be reported immediately.

All employees are reminded that it is a criminal offence to offer, promise or give any financial or other advantage to any other person (including business partners, suppliers, officials or regulatory bodies), if the intention is to induce the other party to act improperly in their business or public function. In addition, any contravention of the Bribery Act 2010 by an individual associated with eftec may expose eftec to criminal liability.

3.3 Whistleblowing

eftec is committed to maintaining the highest standards of honesty, openness and accountability. Where an employee has a genuine concern or awareness of an issue of malpractice or dishonesty, there is an expectation from eftec that the employee will raise the issue with eftec's Founding Director, Ece Ozdemiroglu – or another Director. Failure to do so could lead the employee to be viewed as negligent or complicit in any inappropriate acts and may lead to disciplinary action.

eftec has an expectation that its suppliers, third party contractors and partners have a similar policy and

¹ <http://www.carbonbalanced.org/>

procedure within their own organisation.

3.4 Anti-bribery

3.4.1 What constitutes bribery?

Under the Bribery Act 2010, a bribe is a financial or other type of advantage that is offered or requested with the:

- Intention of inducing or rewarding improper performance of a function or activity, including facilitation payments (to induce officials to perform routine functions that they are otherwise obligated to perform); or
- Knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.

A criminal offence will be committed under the Bribery Act 2010 if:

- An employee or person/company associated with / acting for / on behalf of eftec offers, promises, gives, requests, receives or agrees to receive bribes; or
- An employee or person/company associated with / acting for / on behalf of eftec offers, promises or gives a bribe to a foreign public official with the intention of influencing that official in the performance of his/her duties (where local law does not permit or require such influence).

3.4.2 What is prohibited?

eftec prohibits employees or associated persons from offering, promising, giving, soliciting or accepting any bribe. The bribe might be cash, a gift or other inducement to, or from, any person or company, whether a public or government official, official of a state-controlled industry, political party or a private person or company, regardless of whether the employee or person/company associated with eftec is situated in the UK or overseas.

3.4.3 Procedures and risk assessment

As a small or medium sized business, which faces minimal bribery risks, we have determined that we require relatively minimal procedures to mitigate those risks. We will apply the *following six principles* when deciding what, if anything, we need to do differently to ensure we are compliant with anti-bribery legislation:

1. Proportionality: the action(s) we take should be proportionate to the risks we face and to the size of our business.
2. Top level commitment: senior management should be able to show that have been active in making sure that our staff and the key people who do business with us understand that we do not tolerate bribery.
3. Risk assessment: bribery risks should be considered within Risk Assessment processes we routinely undertake in relation to new markets, clients, and projects, particularly if we are entering into new business arrangements and new markets overseas.
4. Due diligence: knowing exactly who we are dealing with can help to protect our organisation from engaging with people who might not be trustworthy. We may therefore ask questions and carry out checks before engaging others to represent us in business dealings. **PROCEDURE: carrying out more rigorous Due Diligence checks on those suppliers that we consider higher risk.**
5. Communication: communicating our policies and procedures to staff and to others who will perform services for us enhances awareness and helps to deter bribery by making clear the basis on which our

organisation does business. **PROCEDURE: circulating our policies to staff and associates.**

6. Monitoring and Review: The risks we face and the effectiveness of our procedures may change over time. We will review the anti-bribery steps we have taken so that we keep pace with any changes. **PROCEDURE: reviewing our policy and risk assessment at least annually².**

eftec has determined that there is low risk of bribery being committed by or on behalf of our organisation. The procedures that we have adopted (set out in points 1-6 above) are proportionate to that risk.

As well as this, eftec has other proportionate procedures in place through existing controls over company expenditure, accounting and commercial contracts. We have based our assessment on the following: -

- The majority of our business is undertaken primarily in the UK;
- We do operate overseas, but mostly with other countries within the European Union;
- For those non-European countries we deal with, we have a good understanding of the sector in which we are working.

3.4.4 Hospitality, promotional or other business expenditure

The Government does not intend that genuine hospitality or similar business expenditure that is reasonable and proportionate be caught by the Act, so we may provide bona fide hospitality, promotional or other business expenditure.

Examples are providing tickets to sporting events, taking clients to dinner, offering gifts to clients as a reflection of good relations, or pay for reasonable travel expenses in order to demonstrate our goods or services to clients if that is reasonable and proportionate for our business.

Procedures: the Company Directors and Business Manager possess company credit cards. Expenses are coded and reconciled on a monthly basis.

For personal expenses, employees and, where relevant, persons associated with eftec should submit requests to Senior Management for proposed hospitality and promotional expenditure in advance of proposed dates. eftec maintains a Gifts and Hospitality register where we record:

- The objective of the proposed client entertainment or expenditure
- The identity of those who will be attending
- The organisation that they represent; and
- Details and rationale of the proposed activity.

Records and receipts must be provided.

4. Modern Slavery

From 29 October 2015, the Modern Slavery Act 2015 requires commercial organisations to make a public statement as to the actions they have taken to detect and deal with forced labour and trafficking in their supply chains – the Transparency in Supply Chains obligation. The guidance ([available here](#)) provides clarity on some areas of uncertainty. It emphasises the intention behind the Act that an organisation will commit time and resources to understanding and working to combat the issue of slavery in its supply chain.

² Whilst conducting the November 2019 annual review, government legislation was checked. We note that no changes have been made to the government guidance since last year.

4.1 What is modern slavery?

The guidance points out that there is a “spectrum of abuse” and it is difficult to be certain at what point “poor working practices and lack of health and safety awareness seep into instances of human trafficking, slavery or forced labour in a work environment”.

4.2 Who is most at risk?

Intricate global chains of contracting and sub-contracting make it easy for business to lose sight of the conditions under which their goods are produced. Sectors where there is a predominance of low paid unskilled labour and those which are dependent upon global supply chains will be particularly vulnerable.

eftec does not fall into this category.

4.3 Who is required to comply?

The Transparency in Supply Chains obligation applies to any commercial organisation (a corporate entity or partnership) in any sector that supplies goods or services, carries on a business or part of a business in the UK, and has a total annual turnover of £36 million or more.

eftec’s turnover is under the threshold, but we have prepared this policy statement to confirm our commitment to anti-slavery and to provide assurance to our clients that we do not conduct or condone modern slavery.

4.4 eftec’s approach to anti-slavery

We set out below our preventative procedures and the reasons why we consider ourselves low-risk:

- We consider the nature of eftec’s activities and business models (as described in our most recent Business Plan) as low risk.
- We have reviewed our existing corporate responsibility policies and consider that they reflect our commitment to anti-slavery;
- We ensure that our employees are in receipt of no less than the applicable minimum wage. We have robust immigration checks in place;
- We have no employees in high-risk countries;
- We have reviewed national and international supply chains in order to identify risk areas. We do not believe that additional due diligence is required;
- Where appropriate, we seek assurances from our suppliers that they comply with the Act; and
- We ensure that this policy is available to our staff and stakeholders.

5. Mandatory training

eftec communicate details of this policy and the requirements therein through mandatory annual training at employee induction and on an annual basis. This is achieved through policy dissemination.

In respect of sustainability, as an environmental economics consultancy, all of our staff hold an environmentally focused Masters degree, and therefore already have a high level of awareness of the environmental impacts of businesses and consumers. Our sustainability policy is communicated to our

staff as part of their induction process. Any amendments to the policy or to associated procedures are disseminated to employees through our weekly workplan meetings and/or regular team strategy meetings.

We are committed to:


- Ensuring that all employees and associates are aware of our sustainability policy and our commitment to continual improvement;
- Providing training, development and progression opportunities to all staff; and
- Regularly reviewing all our practices and procedures to ensure not only compliance but improvement.

6. Requirements from sub-contractors

As the nature of our work requires inter-disciplinary and specialist input, we regularly work with individuals from our associate network, other individual experts and other academic institutions and consultancy companies. As part of selecting such experts to include in our associate network in general and in consortia specifically designed for individual projects, we seek to ensure that our sub-consultants also comply with the rules of this policy as it applies to their work and the services provided to the Client.

7. Implementation of policy

This Policy shall be deemed effective as of the date of issue. This Policy has been approved and authorised by:

Name: Ian Dickie
Position: Director
Date: November 2020
Signature: 

Next Review Date: **November 2021**