

2017

Marine Safety & Security Systems

Company's Code of Business Conduct Policy



C-VIGIL Ltd : marine (CVM)

In
association
with



C-VIGIL Ltd : marine (CVM)





CODE OF BUSINESS CONDUCT POLICY

C-VIGIL Ltd : marine (CVM) is a provider of equipment and services to the Marine & Offshore Industries and will endeavor, to carry out its responsibilities as laid out in this policy document to the best of its abilities.

Our business activities are subject to the national laws and regulations of the UK when dealing with environmental protection, product safety and social welfare matters.

SECTIONS...

1. ***Environment***
2. ***Business Ethics***
3. ***Workforce Conditions - Including Labour Issues, Anti-slavery & Human Trafficking***

SECTION 1. – ENVIRONMENTAL POLICY

C-VIGIL Ltd : marine (CVM) recognises and accepts its responsibilities to minimise, where practicable, the impact of its activities on the environment.

The salient points of this policy are: -

- Comply with ALL customers' requirements, be it onboard or at shore based facilities.
- Minimise waste during the manufacturing process by careful collection of swarf, drillings, off-cuts, wire preparation, cable sheathing...etc.
- Efficient use of utilities.
- Any waste will be placed in respective receptacles allocated for that purpose and comply with the customers directives.
- Environmental legislation compliance relevant to the Company's activities.
- Undertake recycling of waste products whenever possible.
- This policy has been incorporated into the Company's QA procedures and will therefore be reviewed and audited annually.

SECTION 2. – BUSINESS ETHICS POLICY

C-VIGIL Ltd : marine (CVM) always tries to conduct its business professionally with honesty, integrity and in an ethical / moral manner.

This policy applies to all employees — regardless of status or position subcontractors, suppliers, agents, consultants or anyone providing a service to the company.

This policy defines bribery and corruption as follows: -

Bribery — is, but not limited to, the offer, promise, giving, receiving or demanding of any form of benefit/gift/inducement whether it is financial or other with the intention of influencing in order to gain an advantage or business improperly, an action which is deemed illegal, unethical and/or a breach of trust.

Corruption — a dishonest and unethical act involving the misuse of power and/or the misappropriation of funds with the intent to entice/exploit/influence for personal gain.

This policy accepts that hospitality practices and promotional gifts are lawful when they are properly recorded, transparent, and proportionate and carried out in moderation. There must be no intension, suggestion, expectation or implied requirement for the recipient to feel any form of obligation to reciprocate in return with any favours or preferential treatment of C-VIGIL Ltd : marine (CVM) in their business activities, and vice versa. Any involvement with any such activities by any C-VIGIL Ltd : marine (CVM) employee must gain authorisation from senior management in advance and be recorded accordingly.

C-VIGIL Ltd : marine (CVM) will not make nor will it accept any form of facilitation payment of any kind from or to any person/representative/company.

SECTION 3. – WORKFORCE CONDITIONS - INCLUDING LABOUR ISSUES, ANTI-SLAVERY & HUMAN TRAFFICKING POLICY

This statement is made pursuant to the Modern Slavery Act 2015 and sets out the steps that C-VIGIL Ltd : marine (CVM) has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour.

C-VIGIL Ltd : marine (CVM) has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

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The main area of risk with respect to slavery and trafficking is through our supply chain. We try to ensure that all our regular suppliers are committed to ensuring that their supply chain does not tolerate any forms of slavery or human trafficking. When sourcing materials and equipment we endeavour to use suppliers', who have stated their commitment to and have the same approach as C-VIGIL Ltd : marine (CVM) to this unacceptable practice.

This policy sets out our stance on modern slavery and demonstrates our commitment to ensure there is no presence of it in our business operations. It identifies the need for due diligence during recruitment and encourages our employees to identify any concerns they may have on this subject confidentially. It also shows our level of scrutiny when dealing with suppliers whether that be in the form of materials or provision of services. We will not knowingly support or deal with any business involved in slavery or human trafficking.

As part of our QA procedures C-VIGIL Ltd : marine (CVM) maintains a preferred supplier list. We try to ensure that our suppliers have subsequent anti-slavery policies, which they in turn ensure their suppliers conform to, before they become a preferred supplier.

For and on behalf of C-VIGIL Ltd : marine (CVM)



Steve Smith

Quality Assurance and Compliance Manager



C-VIGIL^{LTD}
marine
GUARDIAN SYSTEMS



www.cvigil.co.uk

www.kvasir-group.com

C-VIGIL Ltd : marine (CVM)

The Barn, Bryntirion Rd
Bagillt, Flintshire
N. Wales, CH6 6DS, UK

+44 (0)1244 879 279

general@cvigil.co.uk

www.cvigil.co.uk

Company Reg No.
0447624

VAT Reg No.
804 6004 68

ISO 9001:2008 Reg No.
2001 654

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