

Corporate Social Responsibility Policy

At LTI Metaltech Ltd. we recognise our corporate and social responsibilities to all of our stakeholders, including:

- Employees
- Suppliers
- Customers
- Investors
- Community

We are committed to conducting business in a manner which achieves sustainable growth whilst fulfilling legal and moral obligations. We are a unique partner and recognise that every Company is unique too, so we work closely to create lasting partnerships that deliver mutually beneficial results.

The ethos we have chosen to adopt aims to achieve our business objectives in a caring and responsible manner, recognising the economic, social and environmental impacts of our activities. We aim to be the best in our industry and this document sets the course towards our goal.

A handwritten signature in blue ink, appearing to read 'ER', with a long, sweeping horizontal stroke extending to the right.

Edgar Rayner
UK Managing Director

INDEX

	Page No.
Our Approach	3
Our Values	3
Our Employees	3
Our Suppliers and Sub-contractors	5
Our Customers	6
Our Investors	6
Our Work in the Community	6
Our Commitment to Sustainability	7
Our Integrity	8
References	7

Our Approach

At LTi we are committed to a formal Corporate and Social Responsibility (CSR) policy to support our Business Strategy. This policy documents our status and address our goals for 2025 and beyond.

For LTi Metaltech, CSR:

- Is a key part of our organisation's future and is considered critical to our relationships with employees; clients; suppliers; sub-contractors and the community in which we work;
- Covers all aspects of corporate governance and is about ensuring we always conduct our business in an ethical way, considering the impact our business has economically, socially, environmentally and on individual human rights.
- Will follow the ISO 26000 guidance both internally and with its stakeholders.

Management

Our UK Managing Director has responsibility for policy implementation within the Company and this policy is signed by him to demonstrate his and the management team's commitment to ensure that this CSR policy is firmly embedded in our organisation's strategy and culture.

Our Goals

- To be the number one strategic supplier for welded fabrications and to provide our customers with a world-class service in terms of delivery, quality and cost.
- To be recognised as a leading pressure vessel producer.
- To be widely respected as a model employer in the community and to maintain a safe and healthy environment for our employees.
- To create and maintain a proactive and sustainable culture of continuous improvement.
- To deliver value through innovative processes and technology
- To continually advance our Environmental awareness and our commitment to improve practices.

Our Vision and Values

The Vision of LTi Metaltech is as follows;

'To produce exceptional welded fabrications, delivering quality and value through our expertise and innovation'.

The Values of LTi Metaltech are as follows:

- **Responsible**
 - Secure, Compliant and Ethical
- **Collaborative**
 - Inclusive, Respectful and Trustful
- **Progressive**
 - Ambitious, Innovative and Diverse

Our Employees

It is the vision of LTi Metaltech to be widely respected as a model employer in the community. We will do this by creating development and training opportunities, by providing a flexible working environment with competitive wages and through strong communication channels between all areas of the business

Dignity

We recognise that our reputation is dependent on the quality, effectiveness, and skill base of our employees and that our staff are our most valuable resource. We believe that all employees should be offered equal opportunities and are committed to operating recruitment procedures to ensure the fair and equitable recruitment of prospective employees.

Diversity

We are committed to maintaining a working environment free from discrimination, victimisation, bullying and harassment with all individuals treated equally, irrespective of their sex; marital or civil partnership status; sexual orientation; race; colour; ethnic or national origins; religion or belief; disability or age. All employment decisions will be made in a non-discriminatory manner.

Health & Safety

We are formally accredited and committed to attaining high standards of occupational health, safety and welfare, recognising our duty and the benefits of providing safe working conditions and ensuring the welfare of anyone affected by our business. We aim to achieve continuous improvement in health and safety performance using robust, and where applicable, externally audited health and safety management systems.

Our comprehensive H&S policy sets out our intentions on reducing any potential Health & Safety risks to as low as practicable. We employ the services of an external Occupational Health provider to look after the occupational health and welfare of our employees.

Recruitment

The company looks to develop employees as their career evolves with LTi Metaltech and, where appropriate, we seek to recruit internally. All jobs are advertised through email and notice boards and internal applications are treated fairly and in a confidential manner.

External recruitment will take place where the skills, knowledge and experience required for a role is not present within the organisation. Assessments, presentations, interviews and references are used to ensure recruitment of the appropriate quality of candidate.

It is a policy of the company that we do not employ individuals under the age of 18 years old due to the environment we work in.

Development

It is our employees' right to know what is expected of them and how they are performing against those expectations. At LTi this means clearly identifying job requirements for every individual, detailing the skills, competencies, qualifications and experience required to carry out each job to maximum effectiveness.

Appraisals are carried out on an annual basis, with informal reviews also taking place throughout the year as required or as agreed. The process is designed to assess individuals in their current role, identifying areas where they excel, but also where development is required. As our employees are key to our success, we invest in training and development appropriate to the needs of both the individual and of LTi

Personal Behavior

We expect courteous, ethical and professional behavior from all staff in every aspect of their professional life. Whether in a business or social situation, if they are representing LTi Metaltech, staff are required to be mindful of this fact and behave accordingly, demonstrating a responsible attitude towards the Company, its assets and property, other employees, clients, suppliers and the public.

Our Suppliers and Sub-Contractors

Suppliers

We regard suppliers as our partners and work with them to achieve our objectives in the delivery of products and services. We see them as key partners for mutual long-term success and we work hard to establish strong business relationships.

We are committed to working with our suppliers to understand where products are sourced and ensure that the principals of environmental sustainability are upheld.

We expect them to have the same high standards as we practice and to work within internationally recognised social and ethical standards. This specifically covers employment terms, fair hours and compensation as well as safe and healthy conditions.

Done properly this can benefit all parties by meeting the expectations of LTi's customers, strengthening partnerships with our suppliers and improving people's lives through the delivery of fair and equal employment that protects the fundamental human rights of their employees and maintains safe working conditions. LTI will not consider doing business with any suppliers unless they meet these responsible trading conditions

Our Customers

We recognise that our business and livelihood depend upon our customers and we therefore seek to treat each of our customers the way we would expect to be treated. Every employee is responsible for ensuring that customer contact is professional and appropriate. We aim to ensure that our customers receive the level of service and quality of product they have come to expect from LTi Metaltech. We communicate effectively with our customers in a way that is acceptable to them.

The highest international standards of conducting business are adhered to in terms of Quality. Safety and Environmental concerns.

Our Investors

LTi Metaltech is part of the LTi group of companies, based in Schontal-Berlichingen in Germany. Whilst the UK company only became part of the overall group in 2005, the parent company has been in existence for over 40 years.

LTi seek to deliver a proactive and sustainable culture of continuous improvement that consistently looks to improve quality and deliver value to our customers through innovative processes and technology. These are core to the LTi vision for continued growth and will deliver safe, reliable and sustainable products to our customers, thereby encouraging mutual success in the future.

Such success rests on the expertise and commitment of our staff and deserves to be shared with all who invest in the company. Further investment in innovation, technology and staff development will continue the growth of LTi Metaltech as a leading manufacturer of pressure vessels.

Our Work in the Community

Community

We aim to work with and contribute to the community in which we operate, particularly that of our neighbours to the site, through the support of community initiatives and local charities. Our role in the community provides local employment and infrastructure that allows the community to develop from economic, social and environmental viewpoints.

LTi are keen to recruit from the local community and, to do this, will consider ways in which we can engage through education so that children and young adults become aware of the career choices that we can offer from both an academic and a vocational perspective.

Charitable Contribution

On a regular basis we make contributions to charities; both widely known national charities as well as smaller local charities, closer to home. In making contributions we endeavor to choose charities close to the hearts of our employees and actively seek their input.

Most recently we have recognised the increasing impact of poor mental health on individuals, on families and on employers and as such we have become a corporate partner to Oxfordshire Mind. Through creating sponsored challenges that encourage activity and exercise, we hope to improve the well-being of our own employees whilst also supporting the excellent work that Oxfordshire Mind do within our community and county.

It has also been our Company policy to donate money to charity instead of sending corporate Christmas cards. This supports our environmental viewpoint as well as increasing our charitable contribution.

Our Commitment to the Environment and Sustainability

Environment

We seek to minimise the environmental impact of our activities through the prevention of pollution, minimising waste, adopting good environmental management practices and systems, which are externally audited. We are committed to conducting our activities and operations in line with current legislation and best environmental practice, seeking continual improvement and innovation within all Group business and activities.

Waste of water and packaging are key concerns and are being addressed by both ourselves and our contractors. Recycling is being improved as waste to landfill is reduced and this is the responsibility of the business as well as the individual employees.

Transport

LTi Metaltech accepts that motor cars and vehicles are responsible for significant emissions to the atmosphere. By reducing total distances travelled we can benefit the environment and the health of our staff and the public. Our approach is to encourage staff through 'cycle to work' schemes as well as the decision to purchase electric Company vehicles where possible and the installation of charging points within the LTi car park.

Significant emissions occur from the type of vehicles and travel undertaken by contractors and distributors used by LTI. We are working with them to measurably reduce both the energy used and the carbon emissions made. We previously gained a nomination for a local Sustainability award for having identified new ways of reducing our Carbon Footprint, a project in which we were extremely successful and continue to build upon.

Our Integrity

Business Principles and Code of Ethics

We are committed to ensuring that our business is conducted in all respects according to the highest ethical and professional standards and always with consideration to legislation and customs in the countries and regions we operate in.

Our concern is to ensure that all our products are ethically produced, and we actively operate in a caring, aware, responsible and ethical manner, through our policies on ethics and supplier obligations.

Bribery and Conflicts of Interest

We do not condone any form of bribery or corruption. Gifts from suppliers or customers in connection with employment should never be encouraged. If acceptance is obligatory or unavoidable any item must be immediately declared to a line manager and the Company will seek to either share these fairly within the organisation or to donate to worthy local causes. Likewise, gifts will not be offered to a supplier or customer as it is likely to compromise the integrity of any business relationship. Travel, Hospitality or Entertainment should also be considered as gifts and are carefully considered in line with this policy.

A conflict of interest occurs when individual loyalties are divided between those of LTI Metaltech and a customer, supplier or competitor. All such situations are to be avoided wherever possible and the management team actively consider this with new engagements.

LTi regards any form of bribery or corruption by any employee, very harshly, and disciplinary proceedings would be instigated as appropriate, up to and including dismissal. Where it may be appropriate, the Company will contact the relevant authorities and support any subsequent investigation.

Anyone who believes that an employee of LTi Metaltech has been a recipient of bribery should email hr@lti-metaltech.com and provide all available information about the allegation. Should they wish to raise this anonymously, they should write to the HR department at the registered company address.

Fraud

Fraud is the act of deliberate deception, misstatement or omission, usually for personal gain, to the loss or damage of another party. LTi regards any fraud committed or attempted by any employee (including falsification of Company books and records) very harshly, and disciplinary proceedings would be instigated as appropriate, up to and including dismissal.

False or deliberately distorted information will not knowingly be given during commercial negotiations, to either suppliers or customers. If unwittingly committed it will be addressed and corrected as soon as the Company becomes aware and then a full investigation carried out as to how the incorrect information was submitted

If any laws have been breached by the commitment of any fraud, the Company will contact the relevant authorities and support any subsequent investigation.

Anyone who believes that an employee of LTi Metaltech has committed, or attempted to commit Fraud, should email hr@lti-metaltech.com and provide all available information about the allegation. Should they wish to raise this issue anonymously, they should write to the HR department at the registered company address.

General Data Protection Regulations

At LTi we understand the need for confidentiality both internally and externally, whether in correspondence, documentation or in the information discussed during a normal working day. We encourage a clear desk policy to prevent potentially confidential information being obtained by unwanted parties and have facilities to effectively destroy sensitive information. In addition, we follow the LTi Metaltech GDPR and Document Storage policy.

The confidentiality of information received in the course of business will be respected and never used for personal gain, before or after employment or business relationships with LTi Metaltech

References

- (1) Equal Opportunities and Harassment Policies, detailed in the Employee Handbook
- (2) Harassment Policies, detailed in the Employee Handbook
- (3) We attained and maintain accreditation to OHSAS18001 in February 2012 in order to formally recognize our achievements in OH&S.
- (4) Health and Safety Policies detailed in the Employee Handbook
- (5) Internal recruitment and advertising Policies in the Employee Handbook
- (6) Pre-screening Contractors obligations
- (7) We attained and maintain accreditation in ISO 9001 for Quality standards and assurance.
- (8) We attained and maintain accreditation to ISO14001 in July 2012 in order to recognize our achievements in this area.
- (9) Ethics including working conditions, health and safety issues, adequate remuneration, working hours and the prohibition of the use of child and forced labour, as well as Whistleblowing and Anti-Competitive Trading.
- (10) Conflict of Interest Policies detailed in the Employee Handbook
- (11) Gross Misconduct definition within the Disciplinary Rules in the Employee Handbook
- (12) Confidentiality agreement policy in the Employee Handbook