



## QUALITY POLICY

The Company's quality assurance system is in accordance with the requirements of BS EN ISO 9001-2015. These requirements are considered to be the minimum standard of attainment by the Company to ensure that the quality requirements of customers are fulfilled in all respects.

It is the policy of the Company to apply the quality assurance programme on all contracts.

The procedures of this system define how the resources of the Company are organised and controlled so that assurance can be given on the Company's ability to work to specification and to control all aspects of product quality.

A programme of continual improvement of all activities directly affecting the quality will be maintained by regular review and monitoring. Quality objectives are set and reviewed at the six monthly System Review. The policy is communicated via induction training, notice boards and on our website.

All procedures and principles detailed in this system are mandatory and no deviations or alternatives are permitted by Company employees or subcontractors involved in these procedures.

The system is reviewed and updated to ensure continual improvement in the effectiveness of the system.

The Managing Director has overall responsibility and accountability for the Quality Management System and makes the necessary resources available to maintain the effectiveness of the management system.

Signed for and on behalf of E.C Williams Ltd

A handwritten signature in blue ink, appearing to read 'H. Skouby'.

H Skouby 19<sup>th</sup> April 2021  
Managing Director



## ENVIRONMENTAL POLICY

E.C Williams Ltd is a high quality electroplating company supplying functional finishes to the engineering sector. It is a third generation family company operating out of a bespoke factory, regulated by the Environment Agency and certified by the BSI since 2004. The coatings supplied have an environmental benefit by extending the product life and functionality of the components coated.

The company:-

- 1) Commits to meet with all its compliance obligations including relevant legislation and regulations and relevant requirements of other interested parties including permit number TP3432PX and the Severn Trent discharge consent 004285V direction 4.
- 2) Maintains a programme of continuous improvement of all activities directly affecting the environment by regular review or monitoring.
- 3) Will continually reduce raw material usage, energy consumption, and waste generation per load.
- 4) Ensures all production personnel are aware of the potential environmental impacts of the processes for which they are responsible.
- 5) Continuously improves its overall environmental impact by monitoring performance and auditing.
- 6) Sets and reviews, in management reviews, its long and short term objectives and targets annually.
- 7) Seeks to work with customers and suppliers to develop better environmental performance.
- 8) Commits to the prevention of pollution and protection of the environment.

The Managing Director has overall responsibility and accountability for the EMS and makes the necessary resources available to maintain the effectiveness of the management system.

Signed for and on behalf of E.C Williams Ltd

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H Skouby      19<sup>th</sup> April 2021  
Managing Director



## GENERAL SAFETY POLICY STATEMENT

- 1) The Board of Directors of E. C. Williams regards the promotion of health and safety measures as a mutual objective for the management and employees at all levels.
- 2) It is therefore company policy to do all that is reasonable to prevent accidents, personal injury, ill-health and damage to property and to protect everyone from foreseeable work hazards, including the public insofar as they come into contact with the company or its products.
- 3) In particular, the company has a responsibility to:
  - provide and maintain safe and healthy working conditions, taking account of any statutory requirements.
  - provide training and instructions to enable employees to perform their work safely and efficiently.
  - make available all necessary safety devices and protective equipment and to supervise their use.
  - maintain a constant and continuing interest in health and safety matters applicable to the company's activities and for its management to set an example in safe behaviour.
- 4) Employees have a responsibility to co-operate in this objective by:
  - working safely and efficiently
  - using the protective equipment provided and by meeting statutory obligations.
  - reporting incidents that have led, or may lead to injury or damage.
  - adhering to company procedure jointly agreed on their behalf for securing a safe workplace.
  - assisting in the investigation of accidents with the objective of introducing measures to prevent a recurrence.
- 5) The members of management in this factory are responsible for maintaining safe and healthy working conditions within the framework of the General Policy Statement.

Signed for and on behalf of E.C Williams Ltd

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H Skouby

19<sup>th</sup> April 2021  
Managing Director



## DATA PROTECTION POLICY

The Company is fully committed to compliance with the requirements of the General Data Protection Regulation (GDPR) and all other data protection legislation currently in force. The Regulation applies to anyone processing personal data and sets out principles which should be followed and gives rights to those whose data is being processed.

To this end, the Company endorses fully and adheres to the Data Protection Principles listed below. When processing data we will ensure that it is:

- processed lawfully, fairly and in a transparent way ('lawfulness, fairness and transparency')
- processed no further than the legitimate purposes for which that data was collected ('purpose limitation')
- limited to what is necessary in relation to the purpose ('data minimisation')
- accurate and kept up to date ('accuracy')
- kept in a form which permits identification of the data subject for no longer than is necessary ('storage limitation')
- processed in a manner that ensures security of that personal data ('integrity and confidentiality')
- processed by a controller who can demonstrate compliance with the principles ('accountability')

These rights must be observed at all times when processing or using personal information. Therefore, through appropriate management and strict application of criteria and controls, the Company will:

- observe fully the conditions regarding having a lawful basis to process personal information
- meet its legal obligations to specify the purposes for which information is used
- collect and process appropriate information only to the extent that it is necessary to fulfil operational needs or to comply with any legal requirements
- ensure the information held is accurate and up to date
- ensure that the information is held for no longer than is necessary
- ensure that the rights of people about whom information is held can be fully exercised under the GDPR (i.e. the right to be informed that processing is being undertaken, to access personal information on request; to prevent processing in certain circumstances, and to correct, rectify, block or erase information that is regarded as wrong information)
- take appropriate technical and organisational security measures to safeguard personal information
- ensure that personal information is not transferred outside the EU, to other countries or international organisations without an adequate level of protection

Signed for and on behalf of E.C Williams Ltd

A handwritten signature in blue ink, appearing to read 'H. Skouby'.

H Skouby 19<sup>th</sup> April 2021  
Managing Director



## **CORPORATE SOCIAL RESPONSIBILITY**

In addition to creating profit and growth for our shareholders, EC Williams also bears responsibility to our various stakeholders, including employees, suppliers, consumers, local community and the environment. In order to achieve overall management and control, EC Williams conscientiously implements this Corporate Social Responsibility policy combined with all local regulations. We emphasise the focus on human value in our manufacturing process and the contribution to customers, environment and society.

### **Environment**

We care about the environment and are committed to reduce, re-use, recycle and to create sustainable solutions.

We are authorised under IPPC regulations and are permitted by the Environment Agency as well as being certified to ISO14001.

During daily business activity, we strive to minimise adverse effects on the environment, optimise natural resources and protect public health and safety. We hold environmental protection activities in all EC Williams operations actively to save energy and resource, control waste material reasonably and to reduce and prevent environmental pollution. We limit the emissions of harmful substances and hazardous wastes by selecting qualified suppliers or those who have obtained related permits for handling dangerous substances. We act in accordance with existing environmental laws. We limit the consumption of scarce environmental resources, such as water, electricity and conserve energy wherever possible.

EC Williams expects its Suppliers and Business Partners to optimise environmental protection across all phases of production, working to prevent waste and minimise the consequences of accidents that could have a negative impact on the environment.

### **Labour and human rights**

EC Williams promotes sound labour and human rights to prevent discrimination and to support positive employment relations in all operations. We treat all people with esteem and respect. EC Williams expects all employees to be polite, objective, fair and respectful in their dealings and working relationships with colleagues and business partners. We promise our employees are protected from any harassment and illegal discrimination. We do not tolerate any form of discrimination based on an individual's race, colour, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status in hiring and employment practices. We do not use forced labour or child labour at any stage of the manufacturing process and support elimination of child labour by our suppliers. Working hours are subject to local regulation but we ensure that all employees have adequate rest breaks at regular intervals for their own safety and well-being.

We expect our business partners and suppliers to deal with employees and business partners in the same spirit of equal opportunity and in the same non-discriminatory and respectful manner.



## **Moral Norms**

To meet social responsibility and to achieve success in the market, EC Williams and our agents are to uphold the highest standards of ethics. The highest standards of integrity are expected in all business interactions. Any and all forms of corruption, extortion and embezzlement are strictly prohibited and reported to law enforcement authorities. We monitor and strengthen the implementation of procedures to ensure compliance with the requirements of business integrity.

We do not provide or obtain bribes or other means of improper advantage. We prohibit insider trading and money laundering. We prohibit employees paying money for employment opportunities.

Information regarding business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices.

Protecting personal data, the data of employees, customers, and suppliers, and ensuring the security of the business data and records are important to EC Williams. We comply with the statutory and contractual requirements when collecting and processing personal data.

## **Protection of identity**

We protect supplier and employee whistle-blowers and ensure the confidentiality of their identities.

We ask our business partners to refrain from engaging in any form of fraud or breach of trust, corruption, granting of advantages, and involvement in bribery. They are obligated to comply with all laws and regulations that apply to them and to the business relationship with EC Williams.

## **Safety**

At EC Williams, safety is paramount and we will ensure, so far as reasonably practicable, every effort to protect the safety of our employees and others who may be affected by the Company's operations. Comprehensive Health and Safety policies and procedures exist in all our facilities, and are strictly implemented and managed.

We will institute and maintain management systems to help protect employees, visitors, contractors and the general public from injury and or ill health. On a periodic basis, the Executive leadership team will monitor and review our safety performance and take corrective and preventative measures as necessary.

As employers, our suppliers must guarantee safety and occupational health in the workplace within the scope of the applicable national laws, rules and regulations.



**Implementation and declaration of commitment**

EC Williams requires its supplier and business partners to acknowledge this CSR policy. Suppliers and business partners are urged to impose an obligation on their suppliers and business partner to comply with equivalent ethical, social, and legal principles.

Confirmation of the content of the Corporate Social Responsibility Policy EC Williams Ltd

Name/Company:

Address:

Signature:

Contact person: