



## Oxford Engineering Ltd - Corporate Social Responsibility Policy

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### 1. Introduction

Oxford Engineering is committed to working in an open and ethical manner. We adopt standards and procedures to ensure that all employees throughout Oxford Engineering and the supply chain are treated with respect, dignity and ensure our manufacturing processes are environmentally responsible.

The prosperity of our business and of the communities within which we operate requires a commitment to the sustainable management of our activities. We have therefore developed a policy that affects and enhances all areas of our business. Oxford Engineering adopts and commits to the principles and practices set out below.

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### 2. Staff/People

We are committed to the well-being and continual development of our employees and to training our workforce, where employees are appreciated, valued and given regular feedback so that each employee has a clear understanding of their role and how they contribute to the business.

We operate a meritocracy, where all employees are recognised and rewarded on the basis of their performance, effort, contribution and achievements.

We expect our employees to act with integrity towards one another and exercise a high standard of business practice and workmanship.

We support diversity, fairness and equal opportunities and aim to involve and consult regularly with employees as to the direction of the business.

We require employees to avoid corruption, conflicts of interest and unethical behaviour.

Employees must disclose to management any actual or potential conflict of interest that may affect their decision-making or impartiality.

All employees must comply with the UK Bribery Act 2010 and the Criminal Finances Act 2017, ensuring that Oxford Engineering does not permit bribery, facilitation payments, or the facilitation of tax evasion.

All employees must also comply with applicable financial sanctions laws and regulations. Oxford Engineering prohibits engaging in any business or transaction with sanctioned individuals, entities, or countries, in line with UK, EU, and other relevant international sanctions regimes.

### 3. Customers

We aim to build long-term relationships with all our customers and other stakeholders by understanding their objectives as they evolve over time and meeting their needs. We aim to give fair value, consistent quality and reliability.

We aim to have the highest professional and ethical standards and will be honest, open and transparent in all our dealings with customers.

Where potential conflicts of interest may exist, Oxford Engineering will disclose them to customers and affected parties in a timely and transparent manner.

We commit to never offering, requesting or accepting bribes, facilitation payments or inappropriate hospitality to secure business.

Oxford Engineering will comply with all applicable financial sanctions laws when dealing with customers and stakeholders. We will not knowingly enter into business with individuals, entities, or organisations subject to sanctions, and we expect customers to uphold the same legal obligations in their dealings with us.

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### 4. Suppliers

We aim to create and maintain strong relationships with key suppliers and contractors.

We aim to choose suppliers that share our ethos in relation to employment practices, quality and environmental controls. This will be communicated to all suppliers and potential suppliers.

We expect suppliers and contractors to comply with anti-corruption, anti-bribery and tax evasion prevention legislation, and to not take part in unethical behaviour.

Suppliers and contractors must comply with applicable financial sanctions legislation. Oxford Engineering prohibits the purchase of goods or services from, or payment to, any sanctioned individual, entity, or jurisdiction. We expect suppliers to prevent breaches of financial sanctions laws.

Oxford Engineering recognises the global concerns relating to Conflict Minerals (tin, tungsten, tantalum, and gold – “3TG”) and other minerals that may directly or indirectly finance armed conflict, contribute to human rights abuses, or harm communities.

- We are committed to responsibly sourcing raw materials and components.
  - We require suppliers to identify and disclose the use and origin of any Conflict Minerals in their supply chain.
  - Suppliers must exercise due diligence on the source and chain of custody of minerals in line with the OECD Due Diligence Guidance and applicable law (including the EU Conflict Minerals Regulation and US Dodd-Frank Act).
  - We will take appropriate steps, including disengagement where necessary, from suppliers that fail to demonstrate responsible sourcing practices.
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### 5. Health & Safety

We aim to achieve and maintain the highest standards of health and safety and provide a safe and healthy working environment for all our activities.

We hold ISO 45001 standard and hold a written Health, Safety and Welfare Policy that is regularly reviewed and updated as necessary.

## 6. Environment

We hold ISO 14001 and have implemented an Environmental & Sustainability Policy appropriate to our business.

We are aware of our environmental impact as a business and have taken and continue to take appropriate steps to mitigate that impact, including setting environmental objectives and targets, implementing procedures and providing training so employees and contractors understand their environmental responsibilities and can seek to improve our environmental performance.

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## 7. The Community

We recognise and understand the significance of the local community within which we operate. We aim to enhance our contribution to the community by being sensitive to the needs of local people and groups and promoting ethical and socially responsible trading.

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## 8. Ethical Conduct, Gifts and Hospitality

Oxford Engineering prohibits the use of company resources for corrupt purposes. We strictly forbid the giving or receiving of bribes, facilitation payments or inducements.

**Gifts and Hospitality** – modest and proportionate hospitality or business gifts may be acceptable where they are appropriate. However, employees must not accept or offer gifts or hospitality that could improperly influence business decisions, create an actual or perceived conflict of interest, or breach the UK Bribery Act.

**Disclosure and Reporting** – all employees have a duty to disclose actual or potential conflicts of interest, inappropriate offers of gifts, or unethical behaviour. These should be reported through management channels or via our established grievance process, which provides a safe mechanism for raising concerns.

Oxford Engineering will take all necessary steps to protect employees who report suspected misconduct in good faith.

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## 9. Labour Standards & Human Rights

Oxford Engineering is committed to upholding internationally recognised human rights and labour standards within our operations and supply chain, in line with the UN Guiding Principles on Business & Human Rights, the UK Modern Slavery Act 2015, and International Labour Organisation (ILO) conventions.

- **Modern Slavery & Forced Labour** – We prohibit all forms of modern slavery, forced labour, bonded labour, and human trafficking in our organisation and supply chain.
- **Child Labour** – We will not employ anyone under the legal minimum working age and will ensure that no child labour is used in our supply chain.
- **Safe & Respectful Workplace** – We are committed to providing an environment free from physical and psychological intimidation, harassment, bullying, or abusive conduct of any kind.

- **Fair Working Conditions** – Employees must be treated with dignity and respect. Working hours, wages, and benefits will comply with applicable laws and industry standards.
- **Supply Chain Responsibility** – We expect all suppliers and contractors to adopt the same standards.

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## 10. Equity, Diversity & Inclusion (EDI)

Oxford Engineering promotes equity, diversity, and inclusion as core values. We strive to:

- Create a workplace where individuals of all backgrounds feel valued, respected, and able to contribute fully.
- Eliminate discrimination on the grounds of gender, race, ethnicity, religion, age, disability, sexual orientation, or any other protected characteristic.
- Provide equal opportunities in recruitment, promotion, training, and career development.
- Encourage diverse perspectives and inclusive decision-making to strengthen our culture and business performance.

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## 11. Communication

This policy is:

- Included in employee inductions.
- Displayed prominently on the Notice board.
- Published on our website: [www.oxeng.co.uk](http://www.oxeng.co.uk).
- Available upon request to any bona fide interested party.

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