

CORPORATE SOCIAL RESPONSIBILITY POLICY

Oasis Group Ltd seeks to be a good corporate citizen in everything that it does

We have therefore determined to bring together our existing operating principles into one framework policy under the heading of Corporate Social Responsibility (CSR). The principles encompassed in this policy cover all areas of the Group's operations and have been developed and continue to be reviewed against and updated by reference to relevant codes of corporate governance and international standards including the United Nations (UN) Universal Declaration of Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, the Guidelines for Multinational Enterprises established by the Organisation for Economic Cooperation and Development (OECD), the Rio Declaration on Environment and Development and the UN Convention against Corruption.

The Oasis Group Ltd Directors support the principles set out in those codes and standards and the aim of this policy is to translate that support into a set of guidelines and standards that set a common approach for OASIS Group Ltd and provide practical guidance for our managers and employees on the ground.

Compliance, monitoring and reporting

Compliance with this policy will be continuously monitored and subject to review by Oasis Group Ltd.

Each local manager is responsible for ensuring that the principles set out in this policy are communicated to, understood and observed by all employees and for ensuring compliance in their area of responsibility.

Employees who reasonably suspect that there has been a breach of this policy must report it to their line manager, senior management, or other mechanisms established by the Group to report such breaches. We recognise that employees may be reluctant to report concerns for fear of retaliation and will take disciplinary action against any employee who threatens or engages in retaliation, retribution or harassment of any person who has reported or is considering reporting a concern in good faith.

Oasis Group Ltd will not criticise management for any loss of business resulting from adherence to the principles set out in this policy. All sections of this policy are underpinned by the Group's Code of Business Ethics, which is set out in Section 1. The other areas covered by this policy are Safety and Security (Section 2), Employment (Section 3), Customer and Community (Section 4) and Environment (Section 5).

SECTION 1 CODE OF BUSINESS ETHICS

This code applies to all of the operations of Oasis Group Ltd and its subsidiaries and sets out the minimum standards which the Oasis Group Ltd expects from staff in their internal and external dealings with colleagues, customers and third parties.

1.1 Basic Standards of Conduct

We will conduct every aspect of our business with honesty, integrity and openness, respecting human rights and the interests of our employees, customers and third parties.

- We will respect the legitimate interests of third parties with whom we have dealings in the course of our business.
- We will maintain the highest standards of integrity – for example, we will not promise more than we can reasonably deliver or make commitments we cannot or do not intend to keep.

1.2 Employees

Each Oasis Group Ltd centre

- Is committed to creating and maintaining a safe and healthy working environment for its employees.
- Will strive to create a workplace in which there is mutual trust and respect and where every person feels responsible for the performance and reputation of our company.
- Will respect the individual and each other's rights, customs and traditions including the right to freedom.
- Will work towards achieving a diverse workforce, recruiting, employing and promoting employees only on the basis of objective criteria and the qualifications and abilities needed for the job to be performed.
- Will maintain good communications with employees through our information and consultation procedures.
- Will assist employees in realising their potential.

1.3 Customers

- (a) Oasis Group Ltd is committed to providing safe, value for money, high quality, consistent, accessible and reliable services to its customers.

1.4 Shareholders

- (a) Oasis Group Ltd will conduct its operations in accordance with the principles of good corporate governance.

1.5 Business Partners

- (a) We aim to develop strong relationships with our suppliers, based on mutual trust, understanding and respect.
- (b) In those dealings, we expect our partners to adhere to business principles consistent with our own.
- (c) Oasis Group Ltd companies will conduct their operations in accordance with the principles of fair competition and applicable regulations.

1.6 Compliance with Law

- (a) All members of the Group will comply with the laws and regulations applicable wherever they do business. Appropriate training will be provided for employees as necessary.

1.7 Business Integrity

- (a) No Oasis Group centre shall offer, give, seek or receive, either directly or indirectly, inducements or other improper advantages for business or financial gain and no employee may offer, give, seek or receive any gift or payment which is, or could be construed as such. If an employee is in any doubt as to whether he or she may accept an offer, that employee should discuss the issue with his or her manager, Group HR or Company Director.
- (b) Oasis Group Ltd accounting and other records and supporting documents must accurately describe and reflect the nature of the underlying transactions.
- (c) No undisclosed or unrecorded account, fund or asset will be established or maintained.
- (d) Oasis Group Ltd will not facilitate, support, tolerate or condone any form of money laundering.

1.8 The Environment

- (a) Oasis Group Ltd is committed to making continuous improvement in the management of its environmental impact.
- (b) We will work with our partners to promote environmental care, increase understanding of environmental issues and disseminate good practice.

1.9 Community Involvement

- (a) Oasis Group Ltd strives to be a good corporate citizen and to fulfil our responsibilities to the societies and communities in which we operate.

1.10 Conflicts of interest and confidentiality

- (a) Whilst Oasis Group Ltd respects the privacy of its employees, all Oasis Group Ltd employees are expected to avoid personal activities and financial interests, which could conflict with their responsibilities to Oasis Group Ltd.
- (b) Oasis Group Ltd employees and consultants must not seek gain for themselves or others through misuse of their positions or company property.
- (c) All actual and potential conflicts (including those arising from the activities or interests of close relatives or partners) should be disclosed to and discussed with an employee's HR manager.
- (d) Information received by anyone in the course of his or her employment must not be used for personal gain or for any purpose other than that for which it was given.
- (e) Where information is confidential, that confidentiality must be respected.

SECTION 2

SAFETY AND SECURITY

2.1 Safety

The health and safety of our employees and customers is our paramount concern. Safety underpins all our operations and our central motto is "If you cannot do it safely, don't do it". We have developed the following high-level health and safety policy, which underpins all of our operational health and safety policies:

(a) General Statement

The of Directors of Oasis Group Ltd is committed to ensuring, so far as is reasonably practicable, the health, safety and welfare of all of its employees at work and also the safety of customers and others.

(b) This policy seeks continuous improvement and compliance with legislation, having proper regard to the protection of people, premises, property and the environment. It is based on the principles that:

- All injuries can be prevented
- The goal is zero injuries
- Safety is the responsibility of all employees
- Working safely is a condition of employment

(c) The Directors of Oasis Group Ltd are tasked to ensure that so far as is reasonably practicable:

- There are adequate arrangements and organisation for health and safety in place within their area of responsibility
- Responsibilities for carrying out these arrangements are clearly allocated
- All staff are given appropriate information, instruction and training
- Adequate supervision is provided to ensure compliance with policies and safe systems of work
- All other legal and statutory duties on health and safety incumbent upon Oasis Group Ltd are complied with in all their operations and locations
- Performance targets are set to achieve a step change in safety performance
- Adequate resources are allocated and competent persons are appointed to support the achievement of the above objectives

(d) We will continually monitor the health and safety performance of our operations which will be subjected to periodic safety audits to assess performance. The nominated directors will:

- Report to the Board all fatal and notifiable injuries to staff or other persons within 24 hours.

The nine key **safety principles** with which all Oasis Group Ltd employees are required to comply are set out below:

- **Do not endanger yourself or others.**
Report any hazardous condition or practice that may cause injury to people, property or the environment.
- **Obey all rules, signs and instructions**
If you do not understand speak to your manager before you start work.
- **Keep your work area clean and tidy.**
Disorder causes accidents, wastes time, energy and materials.
- **Wear protective clothing and equipment as required.**
Keep it in good condition, wear it correctly and ask for a replacement if it becomes damaged or unfit for use.
- **All accidents, incidents and near misses must be reported to your manager.**
Seek immediate help and first aid (if necessary).
- **Do not adjust modify or repair any piece of work equipment unless you are competent and authorised to do so.**
- **Use only the correct tools and equipment for the job.**
Check that they are in good condition before use and use them safely.
- **Before lifting, assess the load and your capability to move it.**
Make sure you get help with any heavy or awkward items, and follow approved techniques.
- **If you have any suggestions to improve safety in your workplace, tell your supervisor or manager.**

We also require contractors to comply with this policy whilst they are working at our premises.

2.2 Security

(a) General Statement

Security is a key issue for our staff and our business. We recognise the range of security issues which can arise and have implemented the following high level security policy.

- (b) The Directors of Oasis Group Ltd are committed to ensuring, so far as is reasonably practicable, the security of our employees at work and our property.
- (c) The threats to security are wide ranging, significant and, in the main, driven by external influences. The ability to control risks varies. However, we have the ability to address or mitigate all of the threats which apply. To be successful in this we need the co-operation and engagement of all of our staff.
- (d) Security is an area in which we seek continuous development and improvement and compliance with existing and emerging legislation. We will heighten the profile of security to ensure all members of staff understand why they should and how they can play their part.
- (e) This statement provides guidance and direction to all employees on what is both required and expected of them. We are confident our staff will appreciate the reasons for this and the benefits to them, their colleagues, and our property.
- (f) We aim to achieve, so far as is reasonably practicable:-
 - A secure environment for staff in their work
 - Security of our property
 - Security of our systems and processes
- (g) We will develop systems to monitor our performance on security within our operations. All operations will be subject to periodic inspection and review.
- (h) Oasis Group Ltd recognises that this security policy needs to be supported by actions and processes to ensure delivery. The following measures are in place to assist this:
 - Staff are actively encouraged to report security concerns. To support this there is a confidential suggestion/reporting system which allows staff to report any concerns with anonymity. This is specifically designed to give staff the confidence to report their concerns even in circumstances where they may find conventional line management routes difficult.
- (i) This approach to security allows us to ensure we have a process to translate our policy into effective implementation within the organisation. It also allows us to formally recognise and demonstrate our commitment to the need for continuous development and improvement in this important aspect of our business. We also require contractors to comply with this policy whilst they are working at our premises.

SECTION 3

EMPLOYMENT

In formulating its employment policies, Oasis Group Ltd is committed as a Company to foster openness, sustainability and respect for employee rights. Our employment policies cover all employees of Oasis Group Ltd and its subsidiaries.

3.1 Equal Opportunities and Diversity Policy

a) The Directors of Oasis Group Ltd are committed to equality of opportunity both in the provision of services and as an employer. This policy sets out Oasis Group Ltd's commitment to treat equally and with fairness at all times its employees, customers, contractors and those who come into contact with the company.

- (b) We are committed to seeking continuous improvement and compliance with legislation based on the following principles.
- Everyone has the right to be treated with dignity and respect.
 - We will not discriminate on the grounds of race, gender, disability, nationality, religion, philosophical belief, political belief, age, sexual orientation, family status or any other factor.
 - We will adopt fair and inclusive practices throughout our operations and will seek to eliminate all prejudice, discrimination, bullying and harassment.
 - All employees have a personal responsibility for the practical application of this policy in their day-to-day activities and must support the policy at all times.
 - Non-compliance with this policy will be treated seriously and will not be tolerated.

(c) The Directors of Oasis Group Ltd are required to ensure:

- They create a productive and safe working environment, promoting diversity and inclusion in their workforce;
- They develop new practices, as appropriate, to ensure all employees, contractors and customers are treated fairly
- They can demonstrate continuous improvement in practices to promote diversity and equal opportunities for all.

Legislation and Codes of Practice

(d) We will comply with and exceed where possible, current national and international legislation and relevant codes of practice in the countries where we operate. We will monitor our compliance with this policy and the requirements of relevant underpinning legislation as appropriate.

Partner Organisations

(e) We are committed to actively working with partner organisations to ensure our policies, procedures and practices are in line with best practice.

Practices and Standard Operating Procedures

(f) Each division and operating company will put in place practices and standard operating procedures to ensure the commitments in this policy are applied and implemented throughout the organisation.

Access to Company Premises

(g) We will take all reasonable steps to ensure that our buildings and premises are accessible to disabled employees, customers and visitors as required by the Disability Discrimination Act (DDA) in the United Kingdom..

Access to Information

(h) We will seek to ensure that information is made available to our employees in alternative formats as required.

Recruitment

(i) All recruitment will be carried out with regard to fairness, equality and consistency for all candidates at all times. Recruitment practices will be inclusive and we will endeavour to ensure there are no barriers to employment of suitable candidates.

Staff Training

(j) We will provide our staff with the necessary guidance and training to ensure the effective implementation of this policy and to ensure we are an inclusive employer and service provider.

Complaints

- (j) Any employee who feels that he or she has grounds for complaint in relation to bullying, discrimination, harassment or victimisation has the right to pursue the complaint through our grievance procedures.

Reporting

(l) We are committed to monitoring and reporting on our actions and achievements in relation to implementing this Diversity policy both internally and externally.

Audit

(j) We are committed to ensuring that our operations comply with the requirements of this policy and will periodically audit its implementation.

3.2 Human Rights

Oasis Group Ltd supports the principles of the United Nations Universal Declaration of Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work. We will adhere to the following principles in respect of our staff.

- a) We will treat all employees fairly and honestly, regardless of where they work. All staff will have agreed terms and conditions in accordance with local law or practice and will be given appropriate job skills training.
- b) We will pay a fair wage reflecting local markets and conditions. We will always meet any national minimum wage.
- c) Working hours shall not be excessive. They shall comply with industry guidelines and national standards where they exist.
- d) We will not employ illegal child labour, forced or bonded labour, forced overtime or condone illegal child labour.
- e) We will negotiate in good faith with the properly elected representatives of our employees.
- f) We will abide by the non-discrimination laws in any country in which we operate.
- g) We will not use or condone the use of corporal punishment, mental or physical coercion or verbal abuse. We have disciplinary procedures for any member of staff whose conduct falls below the required standard.
- h) We have formal grievance procedures through which staff can raise personal and work-related issues.
- i) All staff will be given reasonable access to bathroom and rest facilities.

3.3 Data Protection

- (a) We will comply with the relevant principles governing data protection in each country in which we operate.

Section 4

4.1 Suppliers

Ethical Purchasing Policy

- (a) We purchase a wide range of goods and services required in the operation of our business and we also rely heavily on a number of key suppliers for the delivery of our core services. Good working relationships with our suppliers are therefore central to the success of our business. For this reason, we clearly state our purchasing policy as part of ensuring that our business standards are integrated throughout the supply chain.
- (b) We are committed to obtaining and retaining competitive goods and services while at the same time ensuring they are from sources which have not jeopardised human rights, safety or the environment.
- (c) We aim to develop strong relationships with our suppliers, based on mutual trust, understanding and respect.
- (d) More specifically we expect our suppliers to:
 - Adhere to business principles consistent with our own.
 - Ensure that their products and services are produced and delivered to comply with all legislation relevant to their business.
 - Seek to maintain continuous improvement in their supply chain relationship with us.
 - Ensure they adopt and implement acceptable safety, environmental, product quality, product stewardship, labour, human rights, social and legal standards in line with our own code and to ensure these issues are acceptably managed within the supply chain for any products supplied to us.
- (e) We will seek to work with our key suppliers to:
 - Develop long-term meaningful relations to the benefit of both parties.
 - Improve the quality, environmental performance and sustainability of goods and services where this can be achieved to the benefit of both parties.

4.2 Community

Our relationships with the local communities we serve are important to us and are an essential part in the growth of our business. When developing our services, we have a role to play in working with the community as a whole and not just our individual customers.

In line with our core values, our community strategy incorporates the following elements:

Offering employment opportunities to all sectors of the community through non-discriminatory policies and promoting opportunities to disadvantaged and vulnerable groups;

- Promoting engagement between our staff and the community;
- Supporting local community groups and charities;
- Promoting broader opportunities for workplace learning;
- Supporting local initiatives for the development and education of young people in the areas we serve.

SECTION 5 ENVIRONMENT

5.1 Environmental Policy

Through our core business activities we are committed to providing high quality, reliable and added value services to all our customers.

Our policy is to strive to achieve continual improvement in environmental performance.

We are committed to:

- preventing pollution and reducing the overall impact of our operations on the environment.
- maintaining an internal management structure for the management of environmental issues which includes clearly defined responsibilities for environmental management capable of delivering this policy commitment
- complying with, and where possible exceeding applicable legal and other requirements relating to the organisation.
- monitoring our environmental performance and setting objectives and targets for improvement
- providing appropriate training and awareness programmes for our staff

5.2 Climate Change Policy

Climate change has now been recognised as an international issue with national governments on both sides of the Atlantic committed to taking action to reduce greenhouse emissions. We recognise that we emit greenhouse gases from our vehicle fleet, and the facilities from which we operate.

We are committed to reducing the greenhouse gas emissions from our operations in a way which supports national government strategies.

Our key climate change commitments are:

- To assess the potential impact to our business from evolving climate change policies as part of our on-going risk management processes.
- To work actively with our suppliers to improve the fuel efficiency of our vehicles.
- To report annually on our greenhouse gas emissions from all
- vehicles and property in our ownership as above
- To actively promote improved energy efficiency and fuel efficiency within our business.