

Responsible Business Statement

Overview

At 4C Group, we believe that we each have a part to play in ensuring we are ethically responsible in dealing with both colleagues and stakeholders. Our ESG strategy is aligned with the United Nations' Sustainable Development Goals (SDGs). We are committed to fostering environmental stewardship, enhancing social responsibility, building compassionate and inclusive workplaces, and encouraging sustainability, all of which are integral to our operational ethos. Understanding that our societal expectations and needs will change, we remain dedicated to continuously assessing and improving our practices, driving meaningful change, and achieving our objectives across all areas of our business.

Our Commitments

- **Ethical Conduct:** We conduct our business with the utmost integrity, ensuring our actions are always ethical and responsible.
- **Supportive Work Environment:** We are dedicated to creating an inclusive, diverse, and supportive workplace where every team member is valued and encouraged to thrive.
- **Employee Development & Well-being:** We invest in our team members by offering continuous learning and development opportunities.
- **Community Engagement:** We actively engage with and support local communities, fostering strong, meaningful relationships that create lasting positive impacts.
- **Environmental Stewardship:** We are committed to continuously improving our environmental performance, aiming for a sustainable future through innovation and best practices.



Scope and Responsibilities

This Statement applies to all team members, contractors, volunteers, and third parties. Training is mandatory to ensure familiarity with the company's responsible business statement and legal obligations.

What are your Responsibilities?

1. Responsibilities for All Parties

These apply to everyone associated with 4C Group, including team members, contractors, suppliers, and third parties:

- **Ethical Conduct:**
 - Complete all required compliance training, including anti-bribery, whistle-blowing, and conflict of interest policies where relevant.
 - Adhere to the Equality Act and other applicable laws at all times.
 - Uphold the principles of the **Corporate Criminal Offences (CCO)** legislation, ensuring the prevention of tax evasion and its facilitation.
 - Demonstrate risk assessments and/or preventative measures for sexual harassment, modern slavery, health and safety in the workplace, Diversity, equity, and inclusion, anti-corruption, GDPR breaches, and CCO measures.
- **Sustainability Commitment:**
 - Support efforts to achieve the company's **Sustainable Development Goals (SDGs)**.
 - Promote sustainability in daily practices and collaborations.
- **Governance and Transparency:**
 - Maintain open, honest, and transparent interactions with the organisation and its stakeholders.

2. Responsibilities for Team Members

These apply specifically to employees and contractors working within 4C Group:

- **Governance & Community Engagement:**
 - Actively support the **Green Champions Programme**, contributing to sustainability initiatives within hotels and other operations.



- Participate in the company's charitable campaigns, such as those with the **Learning Disability Network**, through volunteering or other activities.
- **Development & Well-being:**
 - Engage in learning and development opportunities provided by the company.
 - Foster a culture of inclusivity and diversity while promoting well-being through mental health and work-life balance initiatives.
- **Environmental Stewardship:**
 - Work with relevant teams to reduce waste, energy, and water usage.
 - Seek innovative solutions that contribute to sustainability and operational efficiency.

3. Responsibilities for Third Parties

These apply specifically to suppliers, contractors, and other external parties engaging with 4C Group:

- **Compliance:**
 - Adhere to all relevant UK laws and regulations, including the **CCO legislation** to prevent tax evasion.
 - Maintain and implement reasonable policies and procedures to prevent tax evasion within your organisation and in dealings with 4C Group.
- **Sustainability and Ethical Practices:**
 - Align with 4C Group's sustainability goals by meeting mandatory certifications and prioritising ethical sourcing.
 - Collaborate on continuous improvements in environmental, social, and governance standards.
- **Transparency and Accountability:**
 - Participate in due diligence processes to ensure compliance with ethical and legal standards.
 - Address any identified gaps in performance or certification requirements promptly and transparently.



Responsible Business Compliance

At 4C Group, we are dedicated to conducting our business with integrity, sustainability, and in compliance with all relevant laws and regulations. Our commitment extends to ensuring ethical practices across all operations, including strict adherence to the UK's Corporate Criminal Offences (CCO) legislation under the Criminal Finances Act 2017. This section outlines our approach to CCO compliance and our expectations for suppliers and partners to align with our responsible business practices.

Prevention of the Facilitation of Tax Evasion

At 4C Group, we uphold a zero-tolerance policy against tax evasion and its facilitation, in compliance with the Criminal Finances Act 2017 (CFA 2017). We require all suppliers, contractors, and associated persons to adhere strictly to these standards. Please note 4C Group conducts itself in accordance to HMRC's six principles on demonstrating reasonable preventative procedures including:

- Risk assessment.
- Proportionality of risk-based prevention procedures.
- Top level commitment.
- Due diligence.
- Communication (including training).
- Monitoring and review.

The following commitments apply:

1. Obligations of Suppliers and other associated persons

You, our Suppliers, your Personnel, and any Authorised Sub-Contractors shall:

- 1.1. Not engage in any activity, practice, or conduct which would constitute:
 - 1.1.1. a UK tax evasion offence within the meaning of section 45(4) of the CFA 2017 ("UK Tax Evasion Offence");
 - 1.1.2. a foreign tax evasion offence within the meaning of section 46(5) of the CFA 2017 ("Foreign Tax Evasion Offence");



- 1.1.3. a facilitation of UK Tax Evasion Offence within the meaning of section 45(5) of the CFA 2017;
 - 1.1.4. a facilitation of Foreign Tax Evasion Offence within the meaning of section 46(6) of the CFA 2017; or
 - 1.1.5. failure to prevent a Facilitation Offence within the meaning of sections 45 or 46 of the CFA 2017.
- 1.2. Comply with 4C Group's policies in relation to the criminal facilitation of tax evasion as set out within the CFA 2017 (please see our CCO policy attached).

1.3 Have and shall maintain in place such policies and procedures as are both reasonable to prevent the facilitation of tax evasion by another person (including your employees, any Authorised Sub-Contractors, and any Associated Persons as defined within the CFA 2017) and to ensure compliance with paragraph 1.1 of this Agreement.

2. Reasonable Prevention Procedures

The meaning of reasonable prevention procedures shall be determined in accordance with any guidance issued under section 47 of the CFA 2017. This includes ensuring that all associated persons comply with the requirements outlined in this statement.

Sustainable Procurement and Ethical Sourcing

We prioritise working with suppliers who share our commitment to sustainability and responsible business practices.

- **Environmental Stewardship:** We aim to reduce our environmental impact through responsible sourcing and by working with suppliers who prioritise sustainable practices.
- **Ethical Standards:** We promote ethical and fair-trading practices across our supply chain, ensuring that human rights are respected and upheld including fair wages and adherence to the Modern Slavery Act.



- **Supplier Collaboration:** We foster long-term partnerships with suppliers who align with our values, working collaboratively to achieve shared sustainability goals.

Continuous Improvement

We are dedicated to continuously assessing and improving our practices:

- **Regular Reviews:** Our policies and procedures are subject to regular reviews to ensure they remain effective and up-to-date with current laws and best practices.
- **Stakeholder Engagement:** We actively seek feedback from our stakeholders to enhance our responsible business practices.
- **Training and Awareness:** We provide ongoing training to our employees and encourage our suppliers and partners to do the same within their organisations.

Communication & Stakeholder Engagement

We communicate our sustainability commitments and progress through our website, internal communications, and stakeholder engagement channels. Every member of our team plays a crucial role in adhering to our sustainability policy and is empowered to contribute to our ongoing sustainability efforts.

Review of Policy

Our ultimate aim is to operate in a way that not only mitigates our environmental impact but fosters the right type of environments and relationships for business and people. This policy shall be subject to periodic review and may be changed from time to time.

