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1. INTRODUCTION

We would like to welcome you to Cathodic Protection Co Ltd ("The Company") and hope that you will be happy here as part of our team.

We ask that you carefully study the contents of this Employee Handbook. It has been created for your guidance and, in addition to setting out our policies, procedures and rules, it also contains a great deal of information that you will find helpful and interesting.

The Handbook is mainly non contractual; however, it should be read in conjunction with your individual Statement of Terms and Conditions of Employment.

The information contained in this Handbook is not intended to be exhaustive but to cover information of a general nature. It contains guidelines that will assist you in carrying out your role within the Company and are designed to provide an efficient and pleasant working environment.

Should you have any questions do not hesitate to ask your manager.

It is the Company's intention to keep the Handbook up to date with legislation and best practice and it will be reviewed at regular intervals. As and when it is updated you will be issued with the relevant replacement documentation.

An up-to-date copy of the Handbook will be available to read at the Company's premises at all times.



2. ABOUT THE COMPANY

Operating since 1950, Cathodic Protection Co. Ltd. (CPCL) was one of the first companies in the UK, set up specifically to provide equipment and engineering services for the cathodic protection of high-pressure gas & oil pipelines, marine structures and storage facilities.

Today the company operates in six continents and combines consultancy, design and manufacture of bespoke materials and systems, with an after-sales service that is second to none. Cathodic Protection Co. Ltd. (CPCL) also leads the market in the field of marine electrolytic anti-fouling systems, with the Cuprion range being used in over 30 countries worldwide.

Our core values are entrenched within our business, using the principles of value engineering, ongoing product development and a strong network of strategic partners. We strive to deliver both cost savings and added value to our customers.

Innovation

We continually seek to develop new products, processes, and services, which will increase customer satisfaction and provide added value.

Performance

We understand the importance of prompt delivery to our clients, with the emphasis on consistently delivering on-time and to specification.

Teamwork

Our success depends on our team, who are extremely talented and perform to the highest standards. We trust, encourage, and empower our staff – our people make us who we are.

Value

We strive to maximise value for our customers. By understanding their requirements, we are able to offer appropriate and efficient solutions.

Customer Focus

We aim to build long term relationships based on our core principles – quality, integrity and reliability. Our success comes only from consistently delivering customer satisfaction.



3. USEFUL CONTACT INFORMATION

Main Address: Cathodic Protection Co Ltd, Venture Way, Grantham, NG31 7XS
Telephone Number: 01476 590666
Email: cpc@cathodic.co.uk
Web Address: www.cathodic.co.uk

Management Team

Chris Martin	Managing Director
Stuart Martin	Sales and Marketing Director
Dan Marshall	Technical Director
Nikki Leeton	Finance Manager
Adam Weatherill	General Manager
Marcus Hardy	Technical Manager
Ed Sparks	Sales Manager
Rob Mason	TR Lead Engineer
Phil Davy	QA/QC Manager

Compliance Team

Chris Martin
Marcus Hardy
Adam Weatherill
Phil Davy
Jon Moss
Martin Bunting
Sam Dodwell
Josh Musgrove

First Aiders

Chris Martin
Adam Weatherill
Colin Tomlinson
Angie Duarte
Bethany Higgins
James Hornsby

Fire Warden

Chris Martin
Stuart Martin
Marcus Hardy
Adam Weatherill

Supervisors & Team Leaders

J. Hornsby	Project Manager
J. Childs	TR Production Lead
P. Evans	Workshop / Factory
S. Filmore	Senior CP Project Engineer
J. Moss	Senior Field Technician
M. Pape	TR Test

C. Jones	Field Engineering Admin
L. Perry	Accounts Payable
S. Dodwell	Stores

Key Holders

Paul Evans
Adam Weatherill
Sam Dodwell
Bob Bowes
Stuart Martin
Caroline Thacker
Chris Martin
Marcus Hardy
Rob Mason

Mental Health First Aid

Charlotte Jones
Rob Mason
Chris Pimm
Rob Mason

Company Pension / Payroll

Chris Martin
N. Leeton

IT Authorisation List

Adam Weatherill
Chris Martin
Ed Sparks
Marcus Hardy
Stuart Martin



4. BEGINNING YOUR EMPLOYMENT

4.1 MAIN STATEMENT OF TERMS AND CONDITIONS

On commencing employment with the Company, you will be issued with a Main Statement of Terms and Conditions of Employment, more commonly referred to as a “Contract of Employment”.

This document contains details about your individual terms and conditions of employment such as your pay and benefits, holidays, hours of work and job title. Should you have any queries regarding this, you should raise them with your Line Manager in the first instance.

4.2 INDUCTION

The Company strives to provide you with information that will help you perform effectively within your role. With this in mind, you will receive an induction within your first few days of employment. The training will include an introduction to relevant members of staff, a tour of the premises and facilities, an overview of Company policies and procedures and a briefing on any Health and Safety requirements.

You will be requested to provide all relevant details at this stage including Driver’s Licence, Passport (for right to work check and NOK, payroll information).

4.3 ROLES AND RESPONSIBILITIES

It is a condition of employment that you are prepared, whenever necessary, to undertake work in alternative departments or other duties within the business which are appropriate to your experience and technical skill level. For instance, during holiday period, or sickness absence, etc. it may be necessary for you to take over some duties normally performed by colleagues. This flexibility is essential as the type and volume of work is always subject to change, and it allows the Company to operate efficiently and gain maximum potential.

If the nature of your job changes, the Company will make every effort to consult with you and to ensure that you understand the level of performance expected, and that you receive adequate training and supervision.

4.4 DATA PROTECTION AND RECORD KEEPING

At the start and throughout your employment you will be asked to provide personal information including personal details, emergency contact information and bank account details for payroll purposes, etc. The Company confirms that all information will be handled, stored, processed and ultimately destroyed in line with the General Data Protection Regulations (GDPR) 2018. The GDPR policy is available from the Company on request.

This information will only be used so that we can monitor our compliance with the law and with best practice in terms of our commitment to Equal opportunities.



Your permission would be required for the information to be disclosed to an outside body unless the Company is legally required to disclose the information.

4.5 CHANGES TO PERSONAL INFORMATION

It is important that all personal information held by the Company is accurate and up to date; it is your responsibility to inform the Accounts team or your Line Manager in writing as soon as possible should any of the following change:

- Your name.
- Your address and contact number.
- Your emergency contact details/next of kin contact details.
- Your bank details; and/or
- Any existing or emerging medical condition and/or disabilities

4.6 INACCURATE INFORMATION

Should it become evident that you have deliberately provided to the Company information that is misleading or inaccurate, the Company may instigate the Disciplinary Procedure. If sufficiently serious, this may amount to gross misconduct for which you may be dismissed.

4.7 PROBATIONARY PERIOD

This section has been replaced by CPOL23 Probation Policy

4.8 EMPLOYMENT ELIGIBILITY CHECKS

In line with immigration legislation, all offers of employment are subject to you providing the Company with relevant documentation which confirms that you are eligible to work in the UK.

You will not be permitted to commence employment until the relevant documents have been provided and we are satisfied that they meet the current immigration criteria laid down by the Government.

You will be advised of the documents required and assistance will be given to support you in obtaining these documents. However, failure to provide the relevant documentation within a reasonable period of time will result in your offer of employment being withdrawn.

4.9 DISCLOSING CRIMINAL CONVICTIONS

Unless spent under the Rehabilitation of Offenders Act 1974, you are required to disclose any criminal convictions which you currently have, or receive whilst employed by the Company, as failure to do so may be regarded as gross misconduct and result in the Disciplinary Procedure being instigated on the grounds of dishonesty.

5. CODE OF CONDUCT

5.1 GENERAL



The success and reputation of the Company is dependent upon the people who work for it. The reputation can only be maintained if we all behave professionally and with courtesy and integrity towards each other, our customers, suppliers and visitors. This code of conduct has been produced so that everyone knows what is expected from them.

5.2 EMPLOYEE RESPONSIBILITIES

- To work conscientiously, safely and loyally on behalf of the Company.
- Not to be involved in any work or activity which is in competition with the Company or which might adversely affect the Company's best interests.
- To obey the reasonable and lawful instructions of the Company and to be flexible in helping the Company achieve its objectives.
- To produce work of the best possible quality.
- To respect and care for the Company's property.
- To strictly adhere to all Rules and Regulations relating to health and safety and report to your manager any hazards to safe working arrangements.
- To comply with the Company's Equal opportunities and Dignity at Work policy to ensure a working environment that is free from discrimination and prejudice and the fear of harassment or violence.
- To notify the Company at the earliest opportunity about any change in your personal circumstances such as your name, address or telephone number.

5.3 ATTENDING WORK

5.3.1 Attendance and Timekeeping

The company operate a time and attendance system. You will be provided a login to '**Chronicle**' when you start. This is to be used for timekeeping, holiday and time management, specific training will be provided by your Line Manager.

All employees are expected to start and finish within their agreed hours of work, specifically employees are required to be ready at their workstations at their agreed start time and are expected to work up until their agreed finish time. Persistent lateness and absence will be addressed by managers/supervisors and may lead to an investigation and instigation of Company policies and procedures as necessary.

It is the employee's responsibility to ensure that they are at work and ready to start at their scheduled time. If you are sick or injured and you cannot attend work, then you must comply with the Company's Sickness Absence Policy. If you arrive at work late it is your responsibility to inform your manager as soon as you arrive onsite.

5.3.2 Standards of Dress

We want to project a professional image, so employees are expected to dress appropriate to the area in which they work. Any requirements as set out by Health and



Safety should be followed at all times. If you have been issued with Company work wear, then you are expected to wear it to perform your duties.

5.3.3 Fitness for Work

At all times you should be fit and ready to carry out your work and responsibilities. Employees should not carry out their role whilst under the influence of alcohol, drugs or other substances. Any employee doing so will be subject to disciplinary action, which may result in dismissal. If the Company feels it necessary, employees may be subject to a medical assessment to assess your current fitness for work, for which you must attend. Please refer to Drug and Alcohol Policy for further information.

5.3.4 Smoking

The Company operates a Smoking Policy, details of which can be found in this handbook. Those who wish to smoke must do so in the designated area only.

5.2 WORKING SUCCESSFULLY WITH OTHERS

5.4.1 Treating others Fairly

The Company aims to provide a working environment where everyone is treated fairly. It expects you to respect visitors and work colleagues and we will not accept any behaviour that may be considered as discrimination, harassment, bullying, victimisation or favoritism.

The Company is committed to equal opportunities. In all aspects of employment, including recruitment, pay, training, promotion, termination and benefits, all employees will be treated as individuals, solely on the basis of their own merits. No employee or potential employee will therefore receive less favourable treatment for any reason, including but not limited to their race, creed, colour, nationality, ethnic origin, age, religion or similar belief, language, gender, gender reassignment, sexual orientation, marital status, disability or membership or non-membership of a trade union. Further details can be found in the Company Equal Opportunities and Dignity at Work Policies.

5.5 WORKING WITH HONESTY AND INTEGRITY

5.4.2 Fraud

As a responsible employer the Company will not tolerate fraud. Fraud covers a wide range of irregularities and illegal acts. A non-exhaustive list includes theft, dishonesty, deceitful behaviour, bribery, forgery, extortion, corruption, conspiracy, embezzlement, misappropriation and false representation. Fraud can range from falsifying expenses and overtime claims, using Company time and property for private use to receiving bribes and inducements.

Where fraud is suspected or has occurred a thorough investigation will be carried out. Any individual found to be involved in fraudulent activity will be subject to disciplinary action, which may result in dismissal.

5.5.2 Gifts, Hospitality and Entertaining



The Company operates an Anti-Bribery and Corruption policy which is contained within this handbook. All employees should ensure they are aware of their obligations with regard to this policy, including their obligations with respect to accepting or giving gifts, hospitality and entertaining.

5.5.3 Conflict of Interest

Employees must avoid any interest that conflicts or appears to conflict with the interests of the Company. An interest is defined as any personal or financial interest in an outside organisation, including private Company, public sector organisation, other employer or voluntary organisation. Business interests of a spouse/partner or family member in an organisation which may compete to supply goods or services to the Company must be declared. If a conflict of interest appears to be unavoidable, it must be disclosed to the Company Director.

All Company trustees, the Director and members of the senior management team will be asked to complete an annual Conflict of Interest declaration.

5.6 WORKING WITH INFORMATION AND COMPUTERS

5.6.1 Sensitive Information

Employees are required to take care to protect the confidentiality of Company business interests by preventing the loss of sensitive information. Sensitive information is knowledge we have at Cathodic Protection Co Ltd that is not generally available to the public and which might damage the business if other people knew it, in particular our competitors or the general public. It includes, for example, student information, product costs and selling prices, financial information, business forecasts, business plans and strategies, commercial and financial information and information concerning other employees.

The release of sensitive information to persons not employed by Cathodic Protection Co Ltd is not permitted unless approved by your manager.

5.6.2 Use of Email and the Internet

It is important that all employees are aware of the Company IT policy. The Company takes misuse of the internet and email very seriously and monitors employee use in line with the law.

Employees should be aware that passing jokes, chain letters, or other emails which amount to harassment, the downloading and circulating of pornographic or offensive and defamatory material will be viewed as a serious disciplinary matter and may lead to dismissal.

5.6.3 Reporting Infringement of the Code of Conduct

An employee should first of all raise any concerns with his or her immediate manager/supervisor. If you are not comfortable speaking with your



manager/supervisor or if you are not satisfied with your manager/supervisor's response, you are encouraged to report your concerns to the Company Director. All issues will be promptly investigated, and the individual will be advised of the results of the investigations as well as any corrective actions that are being taken. If an individual does not consider they have had a satisfactory response, they should enter the Grievance Procedure.

5.7 SOCIAL EVENTS

From time to time, the Company or its employees may arrange social events. The organisation may also run work-related social events to which clients might also be invited. Although these events take place away from the workplace and outside of normal working hours, the Company's rules and code of conduct applies to such events. While management wants everyone to enjoy these social events, it is up to individual employees to ensure that their behaviour is acceptable.

Specifically:

- Employees should consume alcohol only in moderation at work-related social events, irrespective of whether the Company provides or pays for the drinks.
- It is strictly forbidden for any employee to use classified drugs or 'legal highs' at any work-related social event.
- The Company's policy on harassment and bullying applies to work-related social events.
- Employees should not say or do anything at a work-related social event that could offend, intimidate, embarrass or upset any other person, whether as a joke or not.
- Employees must not behave in any way at any work-related social event that could bring the Company's name into ill repute.
- You must not consume excess alcohol such that you may not be fit for work if the next day is a working day.

Any breach of the above rules will result in disciplinary action being taken, up to and including summary dismissal.

6. PAY AND REMUNERATION

6.1 PAY

Details of your pay, frequency of payments and method of calculation are stated in your individual Terms and Conditions of Employment.

6.2 ITEMISED PAY SLIP

You will receive an itemised payslip shortly before every payday which states your basic pay and any additional payments or deductions made for that pay period. Deductions for PAYE, National Insurance Contributions and any other statutory deductions such as student loans, deduction of earnings orders, are also included, as is the net amount to be paid.



You will receive a statement of earnings (P60) every year which must be retained by you as it may be required by various government bodies. Please be aware that the Company cannot produce copies of your P60.

Your payslip will be provided by <https://platform.paydashboard.com/login>, you will be invited to join this within the first week of your employment.

6.3 PAY QUERIES

In the event that you have a query regarding your pay, please inform the Accounts team. Should you be overpaid for whatever reason, you are obligated to repay the overpayment in full; therefore, you must notify the Company immediately. Normally, the total amount of the overpayment will be deducted from your next pay; however, if this causes hardship, arrangements may be made for the repayment to be made over a longer period of time. Failure to report an overpayment may result in the disciplinary procedure being instigated.

Pay queries should be sent into payroll@cathodic.co.uk

6.4 RECLAIMING PAYMENTS MADE BY A THIRD PARTY

In the event employees become absent off work for reasons such as a road traffic accident etc., you may receive a sum of money as compensation or damages from a third party in respect of incapacity.

You must notify the Company immediately of all the relevant circumstances and of any claim, compromise, settlement or judgement made or awarded in connection with it and provide the Company with any information regarding this matter as reasonable requested.

Any payments the Company has made to you because of this period of absence, including Sick Pay, shall be repaid by you to the Company if required, up to an amount no more than the compensation or damages that you received from the third party.

6.5 PENSION ARRANGEMENTS

The Company operates an Auto Enrolment Pension Scheme which you are eligible to join on commencement of employment. Further information will be sent directly to you from the pension provider with details of joining. Employees may opt out of the pension scheme if they wish, information about this will be provided by the pension's provider, Salvus Master Trust)

6.6 BONUS SCHEME – Refer to Terms and Conditions

The Company may from time to time dependent on individual and team performance, productivity and Company profit targets award bonus payments to employees. Any payment if applicable will be entirely at the Company's discretion and will be determined by the Managing Director.

Participation in or payments under any such scheme for any year will not confer upon you any right to participate or to be paid the following year or any subsequent year. No payment will



be made under the scheme if on the payment date you have given, or have been given, notice of termination of employment or you are no longer employed by the Company.

Any such scheme is entirely discretionary in nature and is not incorporated by reference in this document.

6.7 OVERTIME – Refer to Terms and Conditions

Employees are expected to be flexible with regards to overtime. The Company may require you to work overtime and will make every effort to give you reasonable notice.

Employees who are entitled to receive overtime payments or TOIL should have additional hours agreed in advance by their Line Manager where possible. The Company reserves the right to refuse payment for any additional hours not agreed in advance.

Any overtime payments will be paid at time and half where the number of hours worked is over your FTE hours (this will be detailed in your contract of employment).

Any claims for TOIL are at the equivalent rate of time worked – i.e., if you work 2 hours, you will get 2 hours as TOIL. There are no premiums on TOIL.

Before you are able to claim overtime payments, you must have worked your normal contracted hours in the first instance. Eligibility for any overtime payments or TOIL will be made as set out in your individual terms and conditions of employment.



7. BUSINESS EXPENSES – See Separate Policy

7.1 STATEMENT

This policy applies to all members of staff of Cathodic Protection Co Ltd who incur expenses as part of their duties and this policy is in place to provide guidelines with the following objectives:

- To ensure that employees are reimbursed for expenses reasonably incurred, within the scope of the document.
- To clarify how expenses can be claimed in order that employees are neither better nor worse off as a result of expenses incurred in the course of their employment duties, that no taxable benefit liabilities are incurred and that employees are treated consistently across all parts of the business.
- To ensure compliance with tax legislation and HM Revenue & Customs (HMRC) regulations, including payroll taxes, Company taxes and VAT.
- To ensure compliance with general guidance from HMRC, which states that any expenses claimed must have been incurred, be reasonable in value and have been incurred wholly, exclusively and necessarily in the performance of the duties of employment.
- To allow managers and the Company to ensure that expense claims are not excessive or inappropriate.
- To notify employees who claim expenses that these are audited by the Company, its auditors and potentially HMRC and may be challenged.

Employees should bear in mind that a deliberate breach of the Business Expenses and Allowances policy will be treated as gross misconduct under the Company's disciplinary procedure.

Expenses which are not expressly clarified in this document must be authorised by a Director before being incurred or claimed. Failure to do so may result in employees not being able to reclaim the costs they have incurred.

7.2 RESPONSIBILITY

All those persons referred to within the scope of this policy are required to adhere to its terms and conditions.

Individual managers are responsible for ensuring that this policy is applied within their own department. Any queries on the application or interpretation of this policy should be discussed with the Director prior to any action being taken.

7.3 EXPENSE CLAIMS

All expenses should be claimed for using the appropriate expenses claim form, available from the Accounts team.

All expense items should be supported by documentary evidence, including original VAT receipts where applicable. Photocopied receipts will not be accepted.



All expense items should show clearly the date the expense was incurred, the nature and reason for the expenditure and the amount incurred. Items should be listed individually on the claim form in date order. All expenses must be submitted within a month of being incurred (unless there are mitigating circumstances which have been approved by your Line Manager).

7.3.1 Approval of Expenses

All expenses should be authorised by your Line Manager. Approval of expenses is a representation that the expenditure has been incurred in accordance with Company policy.

Those authorising expenses are expected to challenge any amount claimed that seems to be excessive, inappropriate or which is submitted without the relevant documentation or receipt, or for any expenses outside of this policy. They have the authority to reject expense claims and/or refer them for decision to the Director.

The Company will investigate any claim where there appears to be irregularities that cannot be explained. Payment will not be made until claims are approved, regardless of the length of time taken.

7.3.2 Payment of expenses

Authorised expenses claim forms must be submitted to the Finance Office as soon as possible after the expense has been incurred. Authorised expenses submitted in line with this policy will be paid via BACS transfer or payroll in the month the claim was submitted.

Any claims that are incorrectly completed may be returned to the claimant for correction and re-submission. The correction must be countersigned by their Line Manager before the claim is returned.

7.3.3 Expenses incurred in foreign currencies

Where expenses are incurred in foreign currencies, the amounts should be shown in the currency in question and in the local currency equivalent. The rate of exchange to be used is the rate in force on the date of the transaction. The rate of exchange applied must be indicated on the expense form.

7.3.4 Expenses paid using Company issued payment or credit cards

Where employees have paid for expenses using a Company issued payment or credit card, the same evidence, authorisation and reporting rules apply.

7.4 TRAVEL

Employees are expected to use the most reasonable and convenient method of transportation available; having regards for cost and loss of time and the environment. The booking of last-minute travel is expensive. All travellers should ensure that they give as much notice as possible.



7.4.1 Home to work travel

Travel to and from a normal permanent place of work is regarded by HMRC as private travel and cannot normally be claimed as a business expense. Your normal place of work is detailed in your Terms and Conditions of Employment.

7.4.2 International travel

All international travel will be subject to the rules as set out in this policy and must be approved in advanced by your Line Manager or Director.

Please note that if you are travelling internationally on Company business you will, other than in exceptional circumstances, be covered by the Company's travel insurance policy; the Company will not pay for privately arranged travel insurance. Please speak to a Director for further guidance.

7.4.3 Mileage claims (Company car or car allowance)

Employees who travel on Company business are required to claim business mileage using the Fuel Recharge Form. Business mileage will be paid at the rates determined by HMRC, details of which are available from the Finance Office.

Full details of the journey, including start and finish postcodes, the mileage and the reasons for the travel must be shown on the form. Any detours or diversions taken because of road conditions or closures should also be noted.

All claims for mileage payments must be supported by a fuel VAT receipt to comply with HMRC rules. If a VAT receipt is not attached the Company may reduce the amount paid, in line with the lost VAT amount.

7.4.4 Public Transport

All employees are encouraged to choose public transport as an alternative to driving when on Company business away from the normal place of work where appropriate and cost effective.

Employees are responsible for the booking of any travel that they need to undertake. All costs should be authorised by their Line Manager before bookings are confirmed and paid for. Employees should be mindful of the most cost effective and efficient ways to travel including means, accommodation and time.

Travel can be booked using a Company payment/credit card or claimed via the usual expenses process. Where travel is necessary the Company policy is that standard class accommodation is used to avoid unnecessary expenditure.

Taxis, minicabs, underground and buses may all be used. Employees are expected to use the most reasonable and convenient method of transportation available having regards for cost and loss of time and the environment. All fares must be supported with a receipt for the journey.



7.4.5 Taxis

The use of taxis on Company business is a last resort and is only permitted when there is no Company vehicle available, and public transport is not a viable option. When travelling to airports for long haul overseas travel a taxi may be considered as the best mode of transport to ensure the safety and health of the travelling employee.

7.4.6 Driving expenses

Parking fees, road toll expenses and inner city congestion charge payments may be claimed and must be supported by a receipt.

7.4.7 Fines

Employees are personally responsible for the payment of any fine or penalty and associated administration charges incurred for parking offences, speeding or any other moving traffic offences, or breaches of congestion charging.

7.4.8 Cancelled travel

In the event that a visit is curtailed, or a journey cancelled, any unused travel tickets should be reused or returned for refund wherever possible.

7.5 SUBSISTENCE – (See Separate Policy)

7.5.1 Employees staying away from home

Where an employee is required to stay away from home, they will be reimbursed for expenses incurred on accommodation, meals and any other valid business expense. Original VAT receipts must be attached to support accommodation and meal claims unless an exemption applies (see below).

7.5.2 Accommodation – Individual Business Trips

Hotels / Accommodation

When booking hotels, managers should be consulted, any overnight stay totalling more than **£65** (or the equivalent of this in any given currency) per night needs prior approval from the employee's manager. Usually, hotel accommodation will have been booked in advance and authorised by your Line Manager or Director. All accommodation should be made via an appropriate internet service to take advantage of discounted rates.

All expenses must be accompanied by **full VAT receipts** unless justified. If over and above the allowance this must be approved in writing by a line manager or specific project manager.

If booked by the individual on sites that offer benefits such as cashback or discount but no VAT receipt the office must be informed. Examples of this could be:

- Cashback by booking through specific sites
- Hotels offering free rooms but not supplying VAT receipts



- Hotels offering alleged 'cheap rates' but not supplying VAT receipts.

These benefits belong to the company, as these were paid for by the company. In this case this must have prior approval to do this.

Employees must not ask for the Company to be invoiced for any hotel accommodation but should instead settle the hotel bill in full before leaving.

It is not possible to give detailed guidance on accommodation costs in foreign countries as these can vary substantially. Employees should make sure the costs they are incurring are reasonable and have all bookings authorised by their Line Manager in advance of confirmation.

Expenses claims for accommodation should be supported by an itemised hotel bill and not just a credit card receipt. If only a credit card receipt is submitted the employee will be asked to arrange for a copy of the bill to be sent and therefore the claim may be delayed until the bill is submitted to the Finance Office. It is acceptable to redact parts of the bill which are not being claimed before submitting it to the Finance Office.

Where any person on Company business is required to stay away overnight and opts to stay some place other than a hotel or equivalent (i.e. friends, family), costs incurred will not be reimbursed.

7.5.4 Meal allowances

Subsistence

Breakfast and Lunch

When working away from the office for the day, a lunchtime allowance of **£4** (or the equivalent of this in any given currency) will be reimbursed to the employee.

Lunch cannot be claimed whilst working from CPCLs offices.

If leaving **before 6am** a breakfast allowance of **£4** (or the equivalent of this in any given currency) may also be claimed.

For **breakfast and lunch receipts must be submitted** to substantiate this claim for the actual value spent with a **£4.00 limit for reimbursement**.

Note: when completing your expenses forms please add relevant detail on your expenses form such as 'hotel not serving breakfast' and so-on. Where this is not completed as requested the company will use its discretion on paying this money.

Evening Meals

Catholic Protection Co Ltd. will reimburse evening meals for employees staying away from home due to work commitments; these should total no more than **£20** (or the equivalent of this in any given currency) per night per person and be limited to only 1 drink.



All evening meals must be accompanied by **full VAT receipts** unless justified

Meal Allowance

In lieu of self-catering accommodation being sourced and provision of a weekly (5-7 days) allowance of £45 (or the equivalent of this in any given currency) will apply. The company will pay expenses on this receipted allowance for food on a single receipt (this is applicable to food and non-alcoholic drinks only).

A receipt must be provided – **no receipt / no re-imburement.**

If this allowance is being claimed CPCL will not expect further expenses for food for that day period.

Gratuities:

If an individual feels the level of service at a restaurant warrants a 'gratuity' or 'tip' then this is not classed as company expense and **will not** be re-imbursed / will be deducted from salary.

A meal for these purposes is defined as a combination of food and drink and would take a normal dictionary meaning.

The above are the maximum rates the Company will reimburse for meals even if the actual costs of meals purchased is greater.

7.5.5 Overnight stay out of pocket expense allowance

Incidental expenses such as newspapers, medicines, toiletries, personal phone calls, laundry etc. should be paid directly by the employee and cannot be claimed.

7.5.6 Alcohol

The Company will not reimburse for any alcohol (including mini bar) unless it is consumed when entertaining a customer, in line with proposals and approved budget.

7.5.7 Mini bar

Mini bar items, including consumable, snacks, soft drinks and alcohol are not claimable.

7.5.8 Tips and gratuities

In most cases tips and gratuities, including tips for taxi drivers, are not claimable unless included as a service charge on a bill. If tips are unavoidable due to local custom it may be possible to be reimbursed depending on the circumstances.

7.6 Entertaining

It must be stressed that in all cases of entertainment great care must be exercised to ensure that the cost of meals and associated expenses are appropriate to the nature of the business, are not extravagant and do not breach the Company's Code of Conduct or Bribery and



Corruption Policy. The Company reserves the right to reject or reduce expenses that are claimed but considered excessive.

7.6.1 Business Entertaining

Employees, in the execution of their duties, may be required to entertain customers, suppliers, business contacts or potential customers.

Prior approval must be sought and expenses claims must be approved and signed by the Director. The nature of entertaining, the names of the people being entertained and the organisation for whom they work must be clearly stated on the expense claim form.

The consumption of alcohol at such events should be controlled and appropriate (i.e. wine with a meal). Excessive alcohol costs will not be approved and subsequently not reimbursed.

All claims must be supported by a fully itemised VAT receipt.

7.7 CASH ADVANCE

When employees are away overnight, both in the UK and internationally, and expecting to incur costs they may apply for a cash advance. Cash advances are not provided for employees on day trips.

Cash Advances in currency other than pounds sterling should be requested as soon as possible after the international trip is approved to ensure the currency can be purchased in time.

Currency must not be changed back into pounds sterling by the employee but should instead be handed back to the Finance Office (notes only) who will deduct the total from any cash advance or expenses at the rate at which they were sold.

If an employee exchanges any pound's sterling for local currency, they must ensure they keep a receipt so that any adjustments to cash advances or expenses can be conducted at the correct rate. Failure to do so will result in the bank exchange rate for the day the expenses are processed being used instead.

All advances must be accounted for within 14 days of an employee's return from a trip. For this reason, expenses should be submitted as soon as possible after a trip to clear any advance. Failure to do so may result in the withdrawal of the employee's credit facility and the recovery of the advance from the employee's salary.

In the event that an employee leaves the Company before the cash advance is cleared any outstanding monies will be deducted from any final monies owed.

7.8 REVIEW OF THE POLICY

The Company Directors and Finance departments have the responsibility for ensuring the maintenance, review and updating of this policy.



8. TRAINING POLICY

8.1 OBJECTIVES

We are committed to employee training and development to ensure that everybody contributes fully to the delivery of excellence within the business. We may from time-to-time request that you attend specific training in order to maintain, or develop, your skills. Such training may take place on or off site. You may also as part of your job be requested to supervise or train fellow employees or trainees.

Despite this, we recognise that some of you may identify additional training needs which you feel have not already been catered for. This policy sets out how to request such additional training. Usually, you will be asked to comment on your training requirements during the appraisal process with your line manager, but you do not need to wait for your appraisal to raise a training issue.

8.2 STATUS

This policy does not confer contractual rights on individual employees. We reserve the right to alter any of its terms at any time, although, we will notify you in writing of any changes.

8.3 APPROACH

It is our policy only to agree to training requests that will improve your effectiveness in the business and improve the performance of the business. If you identify a training need, or a particular type of training that you would like to undertake, we recommend that you raise this informally with your line manager in the first instance who will talk to you in more detail about the training need you have identified.

Following on from this, a training request application form should be completed by you and signed off by your Line Manager. This form is available on request and will be used to explain your request for training and assist the Company in assessing the necessity of the training you have asked for.

Due to the size of the Company, employees do not have a statutory right to request time off for training, but we may consider it on an informal and individual basis. Any informal request for time off for training does not oblige the Company to arrange or pay for any training that you request, or to pay you for time off to attend the training. However, in appropriate cases, the Company may (at its discretion) agree to arrange the training, to pay for/contribute to the cost/fees of any requested training and/or pay you for some or all of the time off work you take to attend training.

If the Company does agree to meet/contribute to the costs/fees of any training, you will be asked to complete a "Training Agreement" which sets out particular circumstances and conditions of any reimbursement of the costs, for example if you leave the Company within a specified period of completing the training or choose not to complete the training. Such repayment arrangements will be confirmed in writing before any training starts.



8.4 TYPE OF TRAINING YOU CAN REQUEST

You can make a request for any type of training. For example, you might request on the job training, or time off to undertake external training/study, or that the Company arrange training for you or allows you to attend training it has planned for other employees. Remember, though, that it is our policy only to agree to training requests that will improve your effectiveness in the business and improve the performance of the business. We will also take into account the impact of any absence on your work, your colleagues and the business.

8.5 REQUESTS FOR TIME OFF TO TRAIN

Employees do not have a statutory right to time off for training, however, they may still make a request using the Company procedure.

8.6 HOW TO MAKE A REQUEST FOR TRAINING

To make your request, complete the required parts of the training request application form, available on request. Make sure you submit a request sufficiently in advance of the date of the proposed training in order to allow time for the Company to consider the request in accordance with the Company procedures. You should ensure that you make your request at least 12 weeks in advance of the training commencing.

8.7 COMPANY RESPONSE

If you have made a request, we may decide to agree to your request on the basis of the information you have submitted in your application form. If so, we will write to you within 28 days of receipt of your application to inform you of our agreement. In other cases, we will hold a meeting with you to discuss your request in more detail. This meeting will generally be held within 28 days of receipt of your application. We may ask you to provide more information about your request, which we will need to receive before we hold the meeting with you.

The meeting will provide us an opportunity to discuss your application further and to explore how the proposed training might benefit you and the business. We will also explore ways of accommodating any requested time off and the potential impact of your proposed absence on your work, your colleagues and the business.

You should come to any meeting prepared to discuss your training request in a flexible fashion and be able to expand on the points raised in your application. In some cases, following discussion, we might be able to identify alternative ways of meeting your training requests which might be in a different format, or at a different time/place, from that initially requested. If so, we will ask you if you agree to the alternative offered.

We will write to you, normally within 14 days of any meeting, to confirm our decision.



8.8 FACTORS TO CONSIDER WHEN DECIDING WHETHER TO AGREE TO A TRAINING REQUEST

We will take the matters listed below into consideration when deciding if we can agree to a training request. You will see that these relate both to the impact of the training itself, as well as to the ability of the business to accommodate any time off:

- Whether the proposed study or training will improve your effectiveness in the business *and* the performance of our business
- Ability to carry out your duties
- Ability to work at expected levels of performance
- Ability and the ability of your team to meet deadlines and respond to changes in demand
- Ability to be flexible
- The output of your team
- Your team's ability to cover your work
- The working patterns of your colleagues
- The work of other teams and departments
- How your training will be supervised
- Our ability to monitor your on-going performance
- The impact on our relationship with external contacts, including customers
- Your management responsibilities
- Potential costs
- Planned organisational changes
- Health and safety considerations

We will also consider if there might be circumstances in which our agreement might subsequently have to be withdrawn, for example, if there is a sudden unexpected upturn in work or change in your duties/responsibilities and you cannot be spared.

8.9 INFORMING YOU OF OUR DECISION

If we accept all or part of your request, or, if we agree an alternative with you, we will write to you to confirm the details of the agreed training, how it will be funded and any relevant changes to your working hours, pay, pension or benefits. We will confirm the duration of any changes to your working arrangement and if we envisage circumstances in which our agreement might be withdrawn. If, on consideration, we are unable to accept part, or all, of your request we will write to you and confirm the reason for our refusal. There will be no right to appeal.

8.10 CHANGES TO THE TRAINING AGREED

You must tell us in writing immediately if you:

- do not start the agreed study or training for any reason (for example, if it is cancelled);
- do not complete the agreed study or training;
- undertake (or wish to undertake) a different course of study or training; or
- become aware of any changes to agreed study or training, including changes to the timing or content of the course.



8.11 TRAINING RE-CHARGE

Training is an investment by the business in you. This has a two-fold benefit as it benefits both the company and individual. Therefore, the company reserve the right to seek / recharge staff for training where the employee leaves the business shortly after training. i.e. within a 12-18 month period. This can be discussed on a case by case basis

9. HOURS OF WORK

9.1 WORKING TIME DIRECTIVE

Working Time Regulations provide rights to:

- limit the number of hours worked by an employee to of an average 48 hours a week, though individuals may choose to work longer by "opting out".
- a minimum of 5.6 weeks paid leave a year.
- 11 consecutive hours' rest in any 24-hour period.
- a 20-minute rest break if the working day is longer than six hours.
- a minimum of one day off in every seven, or two days in every fourteen.
- a limit on the normal working hours of night workers to an average eight hours in any 24-hour period, and an entitlement for night workers to receive regular health assessments.

The Company will ensure that it fulfils its obligations under the Working Time Directive Regulations. It is the responsibility of an employee to inform their Manager if they are working in excess of 48 hours per week averaged out over a 17-week period (this includes hours worked for another employer).

If any employee wishes to work in excess of the above, they must complete an 'opt out' form.

9.2 WORKING HOURS

Your hours of work, normal start and finish times, days of work and break entitlements are detailed in your individual Terms and Conditions of Employment.

9.3 LATENESS AND ATTENDANCE

The Company accepts that there may be occasional exceptional circumstances that results in an employee being late to work or results in non-attendance. Where absence and/or lateness become excessive, the Company may instigate the disciplinary or capability procedure. Please refer to the Disciplinary policy and Sickness Absence Policy for further details.

10. HOLIDAYS

This section has been replaced by CPOL22 - Sickness and Other Time Off Policy



11. OTHER LEAVE

This section has been replaced by CPOL22 - Sickness and Other Time Off Policy

12. FAMILY FRIENDLY POLICIES

This section has been replaced by CPOL21 Family Friendly Policy

13. SICKNESS ABSENCE POLICY - Refer to Terms and Conditions

This section has been replaced by CPOL22 - Sickness and Other Time Off Policy

14. DISCIPLINARY POLICY

14.1 STATEMENT

The Company requires all of its employees to understand the standards of conduct and performance that are expected of them and that procedures are in place should the required standards not be adhered to.

The purpose of this document is to establish a clear procedure, in compliance with current legislation and codes of practice, which will ensure fair and consistent treatment of employees when disciplinary action becomes necessary

14.2 MISCONDUCT AND GROSS MISCONDUCT

The following are examples of misconduct (which can also amount to serious misconduct) and gross misconduct. Employees should note that these examples are not exhaustive and that they cannot be exclusively categorised under one heading:

MISCONDUCT

- Persistent absenteeism or lateness
- Unauthorised absence
- Failure to follow absence reporting procedures
- Negligence or lack of proper application of duties
- Failure to comply with a reasonable instruction
- Minor breach of Health and Safety rules
- Minor misuse of Company equipment including vehicle
- Willful or excessive wastage of Company time or materials
- Damage to Company property, equipment or materials resulting from negligence.
- Minor breach of the Company's Equal Opportunity policy, Dignity at Work Policy, rudeness towards employees, member of the public or customers. Objectionable, disrespectful or insulting behaviour or bad language.
- Disorderly conduct (including excessive "horseplay") or irresponsible behaviour



- Any other breach of the Company rules or procedures

SERIOUS MISCONDUCT

Please note that where the first offence is sufficiently serious or due to extreme carelessness or has a substantial effect upon the business, it may be justifiable to move directly to the final written warning stage of the formal disciplinary procedure.

GROSS MISCONDUCT

If, after investigation, it is confirmed that you have committed an offence of the following nature (the list is not exhaustive), the normal consequence will be summary dismissal without notice or payment in lieu of notice:

- Physical violence, aggressive behaviour or assault (either on Company premises or whilst acting in the course of their employment outside the Company's premises)
- Serious breach of the Equal Opportunities, Harassment and Bullying Policy, deliberate acts of unlawful discrimination or serious acts of harassment or bullying, indecent or immoral behaviour
- Fraud and deliberate falsification of records
- Theft of other possessions, whether belonging to the Company, employee, visitor or contractor
- Gross disregard of a reasonable instruction from supervisor or management
- Bringing the Company into serious disrepute
- Malicious damage or sabotage to Company or customer property or as a result of recklessness or negligence
- Bribing, attempting to bribe or accepting a bribe
- Solicitation and/or acceptance of money, gifts, services or other inducements for personal gain of family and friends
- Supplying/possessing and/or taking, or being under the influence of illegal drugs, legal highs and/or alcohol on Company property
- Unauthorised release of Company/commercially sensitive information
- Serious breach of the Company's rules or policies
- Criminal or civil offences within or outside employment which render the employee unsuitable for employment
- Serious negligence which causes or might cause unacceptable loss, damage or injury
- Serious breach of Health and Safety rules which causes, or might cause injury to self and others
- Misrepresentation of fact - lying

14.3 INVESTIGATION

Prior to a disciplinary hearing, an investigation into the alleged incident will be carried out without unreasonable delay to establish the facts of the case. In some cases, this will require the holding of an investigatory meeting with the employee and any witnesses before proceeding to any disciplinary hearing. In other cases, the investigatory stage will be the collation of evidence for use at any disciplinary hearing.



You are expected to cooperate fully in these circumstances to ensure all the facts of the case are documented to establish if disciplinary proceedings are warranted. Where practicable the investigating officer will be different from the disciplinary officer who will chair any disciplinary hearing. A decision as to whether a disciplinary hearing is warranted will be based on all the facts relating to the case which are available at that time.

14.4 SUSPENSION

Where gross misconduct is alleged an employee may be suspended on full pay to allow an investigation to take place to establish whether disciplinary action is to be taken at any stage

of the disciplinary procedure. Any such suspension should be for the shortest possible time days and will not in itself constitute disciplinary action. Employees placed on suspension will be informed in writing of the reasons why and their responsibilities during this time.

14.5 SURVEILLANCE

In exceptional circumstances and when it is suspected that acts of gross misconduct are or have taken place, the Company may on occasion use a third party to undertake surveillance activities on and off Company premises, when it is deemed that no other methods of investigation would be appropriate.

Any information or evidence gathered in this manner may be used as part of the disciplinary procedure.

The Company does operate CCTV for the purposes of monitoring, security and safety, and the Company reserves the right to refer to and use any footage for the purposes of investigation into any cases of performance, misconduct or other allegations, and for the purpose of evidence in reference to any allegations of misconduct, performance issues or other. Please refer to the CCTV policy for further guidance.

14.6 INFORMAL COUNSELLING

The Company, where reasonable, will deal with minor or first instances of misconduct, and initial unsatisfactory levels of performance informally by way of informal counselling.

Employees will be informed of any issues by their Line Managers with the objective of setting out expectations allowing the employee to improve within a reasonable timescale.

Employees should also be made aware of what action that may be taken if they fail to improve their conduct.

Informal warnings do not form part of the formal disciplinary procedure and the employee should be informed of this, however the Line Manager will record the discussion using a Record of Conversation, as it may be used or referred to if formal disciplinary action is taken later. Copies of any Counselling Notes will be held on the employee's personnel record.

If informal action has not accomplished the desired effect or if the offence warrants a more serious action, then the formal disciplinary procedure should be invoked.



14.7 DISCIPLINARY PROCEDURE

After an investigation has taken place and all the facts have been established, the following process is applied in all cases:

- Employees will be invited to a disciplinary meeting in writing informing them of when, where and who will be attending the meeting and in what capacity. They will also be informed of the allegations against them and the possible outcomes of the meeting. A minimum of 24 hours' notice will be given to allow a reasonable opportunity to consider your response. The employee may request a postponement of the hearing of up to five working days. However, if, without good cause, an employee is persistently unable or unwilling to attend, the matter will be heard in their absence and a decision made based on the evidence available at that time.
- A meeting to consider and discuss the allegation will be held with a Manager in the business and a note taker/HR Representative, at which you are entitled to be accompanied by a fellow colleague or a Trade Union Representative. The Company has the right to refuse to accept an individual as a companion in the event there is a conflict of interest. The employee may request a postponement of the hearing of up to five working days. However, if, without good cause, an employee is persistently unable or unwilling to attend, the matter will be heard in their absence and a decision made based on the evidence available at that time.
- Employees will be informed of the reason for the meeting and will be given opportunity to state his/her case and answer the allegations made. This will include time to ask questions and present evidence. If any matters come to light during the disciplinary hearing which requires further investigation, the Company may, at their discretion, adjourn the disciplinary hearing to enable the Company to investigate further.
- When making a decision on the disciplinary action to be taken, a Director of the Company will take into consideration all relevant circumstances and facts, previous record of warnings, the seriousness of the offence and your length of service
- Any outcome will be confirmed to the employee in writing, explaining the level of sanction issued and the reasons for it. You will be given the right to appeal against the disciplinary decision, which will be detailed in the outcome.

14.7.1 Disciplinary Actions

Depending on the nature of the misconduct and the outcome of the procedure, the following disciplinary action may or may not be taken:

Stage 1 – Verbal Warning

Stage 2 – First Written Warning

In the event of further unsatisfactory conduct or performance after informal counselling or where the offence is a more serious one, normally a first written warning will be issued. The employee will be advised in writing of the reasons for the warning, the consequences if there



is no satisfactory improvement and the right of appeal. The warning will remain on the employees' record for 12 months.

Stage 3 – Final Written Warning

In the event of further unsatisfactory conduct or performance, or if the offence is a more serious one, normally a final written warning will be issued. This will detail the reasons for the warning and advise that any further breach may result in dismissal. The employee will be advised of the right of appeal against the penalty. The warning will remain on the employees' record for 12 months.

Stage 4 – Dismissal

Where there is failure to improve or modify behaviour while a final written warning is still "live" or where gross misconduct occurs, dismissal may result. The reason for the dismissal will be given in writing to the employee together with details of the date on which employment will cease and the right of appeal. In the case of gross misconduct the result will normally be summary dismissal without the benefit of notice.

After the relevant period of time, the Company will disregard any warning but retain it on the employee's record. In each case, the Company will specify the length of time that the warning will remain "live" but reserves the right to extend the time period in appropriate circumstances.

14.7.2 Action Short of Dismissal

There may be exceptional circumstances where alternative disciplinary action to dismissal is considered necessary. Such action could include demotion, transfer or suspension without pay instead of dismissal. If an employee is transferred, demoted or suspended without pay for up to 10 days the Company may also issue a final warning.

14.7.3 "Live" Warnings

After the relevant period of time, the Company will disregard the warning but retain it on the employee's record. In each case, the Company will specify the length of time that the warning will remain "live" but reserves the right to extend the time period in appropriate circumstances. The Company may take into account any live warnings in consideration of any other misconduct.

14.7.4 Appeal

Any employee who is dissatisfied with the outcome at any stage of the formal disciplinary procedure or believes the sanction issued is unfair will have the right to appeal against the decision. Employees should put their appeal in writing within five working days of the meeting and should detail reasons for appealing.

Wherever possible, the appeal will be heard by a more senior person than the person who took the decision to take disciplinary action. If this is not practicable, the appeal will be heard



by another Manager who has not previously been involved in the process. Where an employee has been dismissed, the appeal will be heard by a Director of the Company.

The employee will receive written notification of the date of the Appeal Hearing and have the right to be accompanied by a work colleague or trade union representative. Should any witnesses be required, the employee must give advanced notice in writing.

The possible outcomes to the Appeal Hearing are as follows:

- The original decision is upheld
- The original decision is not upheld and either a lower or higher sanction being issued
- In the case of dismissal if an employee's appeal is upheld, they could be reinstated with full continuation of service and a lower sanction issued

The decision given by the Manager hearing the appeal will be the final stage in the Disciplinary Procedure.

14.8 ADDITIONAL NOTES

In special circumstances the Company reserves the right to extend the time limits of disciplinary warnings or issue warnings with a longer time period. In these instances, the employee will be informed of the reason for this.

Where your usual Line Manager is absent or unavailable to deal with a disciplinary incident or issuing of a warning in line with the procedure, the Company will nominate a representative with suitable authority to undertake the disciplinary duties of that Manager.

The disciplinary procedure does not apply to employees within their probationary period; however, every effort will be made to ensure fair and equal treatment of these employees.

The Company reserves the right not to apply the disciplinary procedure to employees who have less than 2 years' service; however, every effort will be made to ensure fair and equal treatment of these employees.

14.9 REVIEW OF POLICY

The Company Director has the responsibility for the maintenance, review and updating of this policy.



15. GRIEVANCE POLICY

This section has been replaced by CPOL14 Grievance Policy

16. CAPABILITY POLICY

This section has been replaced by CPOL18 Performance Management Policy

17. WHISTLEBLOWING POLICY

17.1 PURPOSE

Employees are often the first to realise where there may be something seriously wrong or malpractice taking place within businesses. 'Whistleblowing' is viewed by the Company as a positive act that can make a valuable contribution to the Company's efficiency and long-term success. The Company is committed to achieving the highest possible standards of service and the highest possible ethical standards in all of its practices. To help achieve these standards it encourages freedom of speech.

17.2 SCOPE

The Company construes malpractice widely and examples include:

- A criminal offence
- Any activity that causes the Company to breach its legal obligations
- Use of deception to obtain an unjust or illegal financial advantage for the business or personally
- Danger to the Health and Safety of an individual
- Any activity that endangers the environment
- Any willful attempt to conceal information that tends to show malpractice

It is the responsibility of all employees to comply with this policy and to report violations or suspected violations in accordance with this Whistleblowing Policy.

17.3 COMPANY GUARANTEE

The Company is committed to this policy. If an employee uses this policy to raise a concern, provided it is done so in good faith, the employee will not suffer any form of harassment, retaliation or detriment. This policy is intended to allow employees and others to raise serious concerns within the Company rather than seeking resolution externally.

The Company will treat any genuine concern seriously and act according to this policy. If an employee asks for a matter to be treated in confidence the Company will respect the request and only make disclosures with consent. The Company will provide feedback to the employee and remain sensitive to any concerns as a result of initiating this policy.



17.4 REPORTING CONCERNS

17.4.1 Raising Concerns Internally

The Company has an open door policy. In most cases, employees should raise any concerns or queries with their immediate Line Manager. This can be done either verbally or writing if preferred. If you feel you are unable to speak to your Line Manager or you are not satisfied with the response given, you should raise your concern with the Company Director you feel comfortable speaking to.

In the event that you have exhausted the above options and still have concerns, you should report the issue to the nominated external HR consultant.

You may either raise your concerns in person, by telephone or in writing as follows:

Telephone: 01476 570888

In Writing: HR Lincs Ltd, Unit 17, The Old Malthouse, Springfield Road, Grantham, NG31 7BG

Email: info@hrlincs.com

17.4.2 Handling of Reported Concerns

The Company will acknowledge receipt of your concern as soon as possible. All reports will be promptly investigated and as far as possible, the individual will be kept informed of the investigation and any corrective actions taken, except where it would infringe on the duty of confidentiality owed to others.

17.4.3 Raising Concerns Externally (Exceptional Circumstances)

The purpose of this policy is to provide employees the opportunity and protection required to raise concerns internally. The Company anticipates that this would, in most cases, be the most appropriate form of action.

However, in the event that an employee feels they cannot raise a concern internally, and there is a genuine belief that the allegations are true, the employee should consider raising the matter with the appropriate regulator.

Confidential advice can be sought from the independent charity 'Public Concern at Work'. helpline@pcaw.co.uk, or alternatively advice can also be obtained from the Advice, Conciliation and Arbitration Service (ACAS).

17.5 CONFIDENTIALITY

Any concerns may be submitted on a confidential basis by the complainant or submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.



17.6 REVIEW

The Managing Director have responsibility for reviewing, maintaining and updating this policy.

18. RECRUITMENT AND SELECTION POLICY

This section has been replaced by CPOL19 Recruitment Policy

19. EQUAL OPPORTUNITIES POLICY

19.1 STATEMENT

The Company is committed to equality of opportunity in all its employment practices, policies and procedures. No employee or potential employee will receive less favourable treatment for any reason, on the grounds of race, creed, colour, nationality, ethnic origin, age, religion or similar belief, language, gender, gender reassignment, sexual orientation, marital status, part-time status, disability or membership or non-membership of a trade union.

The following document sets out the Company's policy on equal opportunities in the workplace.

19.2 PRINCIPLES

The Company will seek to identify and act upon any unfair or unlawful discrimination which disadvantages individual employees' opportunity on any of the criteria mentioned above. Employees and applicants have the right to complain about unfair discrimination through the appropriate procedures.

The Company will ensure that:

- All employees and potential employees are treated at all times with fairness, dignity and respect in relation to recruitment and selection, training, promotion, deployment and the provision of pay and benefits
- No one is disadvantaged by practices, conditions or requirements which cannot be shown to be justified by objective criteria such as the need to work specific hours or wear protective clothing or equipment
- Any complaints of discrimination are dealt with confidentially and with due sensitivity

The Company has a separate Dignity at Work policy concerning such issues and how complaints of this type will be dealt with.

19.3 TYPES OF UNLAWFUL DISCRIMINATION

Direct discrimination is where a person is treated less favorably than another because of a protected characteristic. An example of direct discrimination would be refusing to employ a woman because she is pregnant.

In limited circumstances, employers can directly discriminate against an individual for a reason related to any of the protected characteristics where there is an occupational requirement. The



occupational requirement must be crucial to the post and a proportionate means of achieving a legitimate aim.

Indirect discrimination is where a provision, criterion or practice is applied that is discriminatory in relation to individuals who have a relevant protected characteristic (although it does not explicitly include pregnancy and maternity, which is covered by indirect sex discrimination) such that it would be to the detriment of people who share that protected characteristic compared with people who do not, and it cannot be shown to be a proportionate means of achieving a legitimate aim.

Harassment is where there is unwanted conduct, related to one of the protected characteristics (other than marriage and civil partnership, and pregnancy and maternity) that has the purpose or effect of violating a person's dignity; or creating an intimidating, hostile, degrading, humiliating or offensive environment. It does not matter whether or not this effect was intended by the person responsible for the conduct.

Associative discrimination is where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic (although it does not cover harassment because of marriage and civil partnership, and pregnancy and maternity). An example of associative discrimination might be a non-disabled employee who is discriminated against because of action he or she needs to take to care for a disabled dependent.

Perceptive discrimination is where an individual is directly discriminated against or harassed based on a perception that he/she has a particular protected characteristic when he/she does not, in fact, have that protected characteristic (other than marriage and civil partnership, and pregnancy and maternity).

Victimisation occurs where an employee is subjected to a detriment, such as being denied a training opportunity or a promotion because he/she made or supported a complaint or raised a grievance under the Equality Act 2010, or because he or she is suspected of doing so. However, an employee is not protected from victimisation if he or she acted maliciously or made or supported an untrue complaint. There is no longer a need for a complainant to compare his or her treatment with someone who has not made or supported a complaint under the Equality Act 2010.

Failure to make reasonable adjustments is where a physical feature or a provision, criterion or practice puts a disabled person at a substantial disadvantage compared with someone who does not have that protected characteristic and the employer has failed to make reasonable adjustments to enable the disabled person to overcome the disadvantage.

19.4 ADHERENCE TO THE POLICY

All employees are required to assist the Company to meet its commitment to provide equal opportunities in employment and avoid unlawful discrimination.

The Company is particularly concerned that equality of opportunity is maintained in the following areas:



Recruitment and Selection

The following principles should apply whenever recruitment or selection for positions takes place:

- Assessment will be made according to the individual's personal capability to carry out a given job, assumptions that only certain types of person will be able to perform certain types of work will not be made.
- Any qualifications or requirements applied to a job which have or may have the effect of hindering applications from certain types of person will only be retained if they can be justified in terms of the job to be done.
- Questions asked will relate to the requirements of the job; if it is necessary to assess whether personal circumstances may affect job performance, this will be done objectively without questions or assumptions being made based on stereotyped beliefs.

Promotion, Transfer and Training

The following principles will apply to appointments for promotion, transfer and training:

- Assessment criteria and appraisal schemes will be carefully examined to ensure that they are not unlawfully discriminatory.
- Promotion and career development patterns will be monitored to ensure that access to promotion and career development opportunities in particular groups of employees are not unjustifiably being excluded.
- Policies and practices regarding selection for training, day release and personal development will be followed in such a way to avoid an imbalance in training between groups of employees unless this is objectively justified.

Terms of Employment, Benefits, Facilities and Services

The following principles shall apply to terms of employment, benefits, facilities and services:

- The terms of employment, benefits, facilities and services available to employees will be reviewed regularly to ensure that they are provided in a way which is free from unlawful discrimination.
- Part-time employees will receive pay, benefits, facilities and services on a pro-rata basis to their full-time comparator unless otherwise objectively justified.
- Pay and bonus criteria, policies and arrangements will be carefully examined and monitored, and if it appears that any group of employees are disadvantaged by them they will be checked to make sure that this is not due to any hidden or indirect discrimination.

Grievances, Disciplinary Procedures, Dismissals and Redundancies

The following principles will apply to all Grievances, Disciplinary Procedures, Dismissals and Redundancies:



- Employees bringing a grievance in good faith (or assisting another to do so) either under this policy or otherwise in relation to an equal opportunities matter will not be disciplined, dismissed or otherwise victimised for having done so.
- Any group of employees will not be disciplined or dismissed for performance or behaviour which would be overlooked or condoned in another group unless there is genuine and lawful justification.
- Redundancy criteria and procedures will be carefully examined to ensure that they do not operate in an unlawfully discriminatory manner.

Inappropriate, Obscene or Discriminatory Materials

The following principles uphold the Company's position on inappropriate, obscene or discriminatory materials:

- Employees, visitors, suppliers and any other persons attending Company premises are prohibited from bringing any pornographic or discriminatory material into any workspaces including external workspaces and Company vehicles.
- Use of Company equipment and/ or facilities including but not limited to computers, internet access, email, notice boards, lockers and any other workspace to access, store, display, generate or forward offensive material is prohibited.
- Materials may include, but are not limited to magazines, photos, calendars, videos, text messages or websites.
- Company email and internet usage is now monitored. Please refer to the separate IT and Phone Policy for further details.
- If any material is found, seen or brought onto Company premises which could constitute a criminal offence (i.e., pedophilia, illegal content etc.), or breaches any current legislation in relation to this, the Company will not hesitate in reporting any and all activities to the police as a matter of urgency.
- Employees found to be in breach of these principles will be subject to the Disciplinary Procedure up to and including summary dismissal.

19.5 RESPONSIBILITIES AND MONITORING

The Company will regularly monitor the effectiveness of this policy to ensure that it is working in practice and review and update this policy as and when necessary.

It is the responsibility of managers to:

- Ensure that the minimum standards established within this policy are adhered to within their area of responsibility
- Keep all sensitive personal data confidential

All employees must;

- Co-operate with any measures introduced to ensure equality of opportunity
- Not induce or attempt to induce others to practice unlawful discrimination
- Not harass, abuse or intimidate others for any reason whatsoever



All employees must cooperate with any measures introduced to ensure equality of opportunity and to ensure that no behaviour is enacted or encouraged that may contravene any element of this policy.

Discrimination, harassment, bullying or victimisation may constitute gross misconduct and could lead to dismissal without notice.

19.6 COMPLAINTS

Any employee who has a concern regarding the application of this policy should normally make use of the Company's grievance procedure.

An investigation will then be conducted, and the individual will receive written notification as to the outcome.

The Company will take any complaint seriously and will seek to resolve any grievance that it upholds. You will not be penalised for raising a grievance, even if your grievance is not upheld, unless your complaint is both untrue and made in bad faith.

19.7 REVIEW OF POLICY

The Company Director has the responsibility for ensuring the maintenance, review and updating of this policy.

20. DIGNITY AT WORK POLICY

20.1 STATEMENT

The Company is committed to ensuring that all of its employees are treated with dignity at work and as such any forms of bullying or harassment will not be tolerated including unacceptable behaviour that takes place on a social media platform.

This policy is designed to prevent bullying and harassment and to deal with any cases that occur within the workplace. This policy applies to all employees, regardless of their role or seniority.

20.2 DEFINITIONS

Bullying is offensive, intimidating, malicious or insulting behaviour, and/or abuse or misuse of power that is meant to undermine, humiliate or injure the person on the receiving end. Bullying can be either physical, verbal or non-verbal, or a combination of all 3.

Behaviour that would not constitute bullying includes:

- Occasional differences of opinion, non-aggressive conflicts and problems in working relations.
- Performance management such as workplace counselling, monitoring ongoing issues and any other actions in line with Company procedures.



Harassment is unwanted conduct that has the purpose, or effect, of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

Harassment may be related to the protected characteristics as set out in the Equality Act 2010, which are sex, gender reassignment, race (which includes colour, nationality, ethnicity or national origins), disability, sexual orientation, religion or belief, marital or civil partner status, pregnancy or maternity and age.

Conduct may be harassment whether or not it is intended. 'Workplace banter' may offend other people and is not a legitimate excuse for harassment. Individuals are affected differently and have individual feelings concerning what is and is not acceptable behaviour towards them.

An individual may be harassed even if they are not the intended subject of the harassment. For example, a person may be harassed by racist comments about a different ethnic group if they create an offensive environment for that individual.

The Company will not tolerate any form of bullying and/or harassment. Any allegations of bullying and/or harassment will be investigated, and if appropriate, disciplinary action will be taken. Bullying and harassment are serious offences and could be regarded as gross misconduct dependent on the circumstances leading to summary dismissal.

20.3 EXAMPLES OF UNACCEPTABLE BEHAVIOUR

Examples of behavior that are covered by this policy include (but are not limited to):

- Spreading malicious rumors or insulting someone.
- Conduct ranging from unwelcome touching to serious assault.
- Unwelcome sexual advances.
- Exclusion or victimisation.
- The offer of rewards for going along with sexual advances, e.g., promotion, access to training.
- Demeaning jokes or comments about another person in regard to appearance, a protected characteristic or any other issue in relation to that person.
- Unwanted nicknames related to appearance, a protected characteristic or any other issue in relation to that person.
- The use of obscene gestures.
- Excluding an individual because he/she is associated or connected with someone with a protected characteristic.
- Ignoring an individual because he/she is perceived to have a protected characteristic when he/she does not, in fact, have the protected characteristic.
- The open display of pictures or objects with sexual or racial overtones, even if not directed at any particular person, e.g., magazines, calendars or pinups.
- Ridiculing someone.
- Non-cooperation whilst in the activity of your role and intentionally obstructing employees on the course of their duties.
- Making threats or comments about job security without foundation.
- Misuse of power or position, or overbearing supervision.
- Deliberate undermining a competent worker by overloading and constant criticism.



20.4 RAISING A CONCERN

If an employee feels that their dignity at work has been compromised, they should initially raise the issue informally with their Line Manager. If an employee feels the situation is more serious or involves their Line Manager, a formal complaint can be raised using the Company's Grievance Procedure.

It should be noted that, where possible the Company will try to resolve all issues informally in the first instance. All employees have the right to be accompanied to a formal meeting by a fellow colleague or trade union representative.

20.5 DELIBERATE, FALSE OR MALICIOUS ALLEGATIONS

Employees have the right not to be victimised for making a complaint in good faith, even if their complaint is not upheld. However, making a complaint that they know to be untrue may lead to disciplinary action up to and including dismissal being taken against them.

20.6 CONFIDENTIALITY

Accusations of bullying or harassment can have a potentially defamatory effect on an individual where confidentiality not observed. Therefore, the Company will endeavor to ensure that all details and documentation of bullying and harassment accusations are kept completely confidential.

20.7 REVIEW

The Company Director has the responsibility for ensuring the maintenance, review and updating of this policy.

21. ANTI BRIBERY AND CORRUPTION POLICY

21.1 STATEMENT

It is our policy to conduct our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and to implementing and enforcing effective systems to counter bribery and corruption.

The Company is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. This policy outlines the Company's position on preventing and prohibiting bribery and corruption, in accordance with the UK Bribery Act 2010.

21.2 PURPOSE

The purpose of this policy is to:



- set out our responsibilities, and the responsibilities of those working for us, in observing and upholding our position on bribery and corruption; and
- provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

The Company will not tolerate any form of bribery by, or of, its employees, agents or consultants or any person or body acting on its behalf. Senior Management is committed to implementing effective measures to prevent and eliminate bribery.

If the Company is found to have any involvement in any acts of bribery or corruption, the potential outcome is an unlimited fine plus up to ten years imprisonment for the individuals involved.

21.3 SCOPE

This policy applies to all employees of the Company and to temporary workers, consultants, contractors, agents and subsidiaries acting for, or on behalf of, the Company ('associated persons') within the UK and internationally.

Every employee and associated person acting for, or on behalf of, the Company is responsible for maintaining the highest standards of business conduct. Any breach of this policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of the Company.

The Company may also face criminal liability for unlawful actions taken by its employees or associated persons under the UK Bribery Act 2010.

All employees and associated persons are required to familiarise themselves and comply with this policy, including any future updates that may be issued from time to time by the Company.

21.4 DEFINITION OF A BRIBE

The Company is committed to complying with the UK Bribery Act 2010 in its business activities in the UK and overseas.

Under the UK Bribery Act 2010, a bribe is defined as:

"A financial or other type of advantage that is offered or requested with the intention of inducing or rewarding improper performance of a function or activity with the knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity".

A relevant function or activity includes public, state or business activities or any activity performed in the course of a person's employment, or on behalf of, another Company or individual, where the person performing that activity is expected to perform it in good faith, impartially, or in accordance with a position of trust.



A criminal offence will be committed under the UK Bribery Act 2010 if:

- An employee or associated person acting for, or on behalf of, the Company offers, promises, gives, requests, receives or agrees to receive bribes in order to facilitate a business advantage to either party; or
- An employee or associated person acting for, or on behalf of, the Company offers, promises or gives a bribe to a foreign public official with the intention of influencing that official in the performance of his/her duties.

The Company prohibits employees or associated persons from offering, promising, giving, soliciting or accepting any bribe. The bribe may be cash, a gift or other inducement to, or from, any person or Company, whether a public or government official, official of a state-controlled industry, political party or a private person or Company, regardless of whether the employee or associated person is situated in the UK or overseas. The bribe might be made to ensure that a person or Company improperly performs duties or functions (for example, by not acting impartially or in good faith or in accordance with their position of trust) to gain a commercial, contractual or regulatory advantage for the Company in either obtaining or maintain Company business, or to gain a personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

This prohibition also applies to indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance, for example through consultants, contractors, sub-contractors, agents, sub-agents, sponsors or sub-sponsors, joint-venture partners, advisors, customers, suppliers or other third parties.

21.5 WORKING OVERSEAS

The UK Bribery Act not only covers acts carried out in the UK but also covers acts carried out anywhere in the world by UK nationals or people ordinarily resident in the UK and any act carried out by a UK Company anywhere in the world.

Employees and associated persons who conduct business on behalf of the Company outside the UK may be at greater risk of being exposed to bribery or unethical business conduct than UK-based employees. Employees and associated persons owe a duty to the Company to be extra vigilant when conducting international business.

21.6 CORPORATE ENTERTAINMENT, GIFTS, PROMOTIONAL EXPENDITURE AND HOSPITALITY

The Company permits corporate entertainment, gifts, hospitality and promotional expenditure which are undertaken within the UK and overseas:

- For the purpose of establishing or maintaining good business relationships
- To improve the image and reputation of the Company; or
- To present the Company's goods/services effectively.

Provided that it is:



- Arranged in good faith; and
- Not offered, promised or accepted to secure an advantage for the Company or any of its employees or associated persons or to influence the impartiality of the recipient.
- Following approval from the Director

The Company will only authorise reasonable, appropriate and proportionate entertainment and promotional expenditure in line with the above guidelines.

Whilst the Company recognises that the practice of giving gifts and hospitality varies between different countries and cultures, the UK Bribery Act makes it clear that in judging what is reasonable, appropriate and proportionate, the standard to be applied is what would be regarded as reasonable, appropriate and proportionate in the UK and not what would be regarded as reasonable, appropriate and proportionate in the country where the gift or hospitality is provided.

Employees and associated persons should submit requests for proposed hospitality and promotional expenditure well in advance of proposed dates to their Manager to gain authorisation for such expenditure. The Company will approve business entertainment proposals only if they demonstrate a clear business objective and are appropriate for the nature of the business relationship.

Any gifts, rewards or entertainment received from clients, public officials, suppliers or other business contacts should be reported immediately to your Manager. In certain circumstances, it may not be appropriate to retain such gifts and employees and associated persons may be asked to return the gifts to the sender. For example, where there could be a real or perceived conflict of interest.

As a general rule, small tokens of appreciation, such as flowers or a bottle of wine, should be registered on the Gift List held by the Finance Office.

If an employee or associated person wishes to provide gifts to suppliers, clients or other business contacts, prior written approval from your Manager is required, together with details of the intended recipients, reasons for the gift and business objective. These will be authorised only in certain circumstances.

Employees and, where applicable, associated persons must supply records and receipts (in line with the Company's Expenses Policy).

21.7 FACILITATION PAYMENTS

The Company prohibits its employees or associated persons from making or accepting facilitation payments. These are payments made to government officials for carrying out or speeding up routine procedures. They are more common overseas. Facilitation payments are distinct from an official, publicly available fast-track process.

Facilitation payments, or offers of such payments, will constitute a criminal offence by both the individual concerned and the Company under the Bribery Act 2010, even where such payments are made or requested overseas. Employees and associated persons are required to act with greater vigilance when dealing with government procedures overseas.



Where a public official has requested a payment, employees or associated persons should ask for further details of the purpose and nature of the payment in writing. If the public official refuses to do so, this should be reported immediately to the Company. Alternatively, if the public official provides written details, this should be referred to the Company for consideration regarding the legitimacy of the request and the Company will take appropriate action.

21.8 CHARITABLE AND POLITICAL DONATIONS

The Company occasionally makes donations to charities as directed and approved by the Director. Employees and associated persons are not permitted to make any charitable or political donations to organisations on behalf of the Company without approval or consent from the Director.

21.9 RECORD KEEPING

Employees and, where applicable, associated persons, are required to take particular care to ensure that all Company records are accurately maintained in relation to any contracts or business activities, including financial invoices and all payment transactions with clients, suppliers and public officials.

Due diligence should be undertaken by employees and associated persons prior to entering into any contract, arrangement or relationship with a potential supplier of services, agent, consultant or representative and should be carried out in line with our internal Company procedures.

Employees and associated persons are required to keep accurate, detailed and up to date records of all corporate hospitality, entertainment or gifts accepted or offered.

21.10 REPORTING SUSPECTED BRIBERY

The Company depends on its employees and associated persons to ensure that the highest standards of ethical conduct are maintained at all times. Employees and associated persons are encouraged to raise concerns about any issue or suspicion of bribery that they may have to the Director at the earliest possible stage. Employees and associated persons are requested to assist the Company and to remain vigilant in preventing, detecting and reporting bribery. The following issues should be reported as soon as you become aware of them (this list is not exhaustive):

- Suspected or actual attempts at bribery
- Concerns that other employees or associated persons may be being bribed; or
- Concerns that other employees or associated persons may be bribing third parties, such as clients or government officials;
- Close family, personal or business connections that a prospective agent, representative or joint-venture partner may have with government or corporate officials, trustees, Director or employees;



- Requests for cash payments;
- Requests for unusual payment arrangements, for example, via a third party;
- Requests for reimbursements of unsubstantiated or unusual expenses; or
- A lack of standard invoices and proper financial practices.

If an employee or associated person is unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, the matter should be referred to the Director.

If an employee or associated person has any concerns of suspected bribery taking place, they should report the matter to the Director. Reported concerns of suspected bribery will be thoroughly investigated by the Company in the strictest confidence. Employees and associated persons will be required to assist in any investigation that takes place.

Employees or associated persons who report instances of bribery in good faith will be supported by the Company. The Company will ensure that the individual is not subject to detrimental treatment as a consequence of their report. Instances of detrimental treatment by a fellow employee because an employee has made a report will be treated as a disciplinary issue. An instruction to cover up a wrongdoing is itself a disciplinary offence. If an employee or associated person is told not to raise or pursue a concern, even by a person in authority such as a Manager, they should not agree to remain silent.

21.11 NON-COMPLIANCE WITH THE ANTI BRIBERY POLICY

The Company will fully investigate instances of alleged or suspected bribery.

Employees who are suspected of bribery may be suspended from their duties while the investigation is being carried out

The Company will invoke its Disciplinary Procedure where an employee is suspected of bribery, and proven allegations may result in a finding of gross misconduct and summary dismissal. The Company may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of, the Company who are found to have breached this policy.

The Company may also report such matters to the relevant authorities, including the Director of Public Prosecutions, Serious Fraud Office, Revenue and Customs Prosecution Office and

the Police. The Company will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

21.12 REVIEW OF PROCEDURE AND TRAINING

Training on this policy forms part of the induction process for all new workers. All existing workers will receive regular, relevant training on how to implement and adhere to this policy.

The Company's zero-tolerance approach to bribery and corruption will be regularly communicated to all employees, suppliers, contractors and business associates at the outset of any contractual arrangements with them.



The Company will regularly monitor the effectiveness and review the implementation of this policy.

The Company reserves the right to amend and update this policy as required. Internal control systems and procedures will be subject to regular audits to monitor the effectiveness of the policy.

For the avoidance of doubt, this policy does not form part of an employee's contract of employment.

21.13 RESPONSIBILITY

The Company's trustees and Director have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. They will also monitor and review the implementation of this policy and related procedures on a regular basis.

Management at all levels are responsible for ensuring instances of suspected bribery that are reported are treated in the strictest confidence and that they are followed up in line with this policy. Managers also have a responsibility to ensure that employees and associated person are not subject to any detrimental treatment in the event of raising a concern.

22. SMOKING POLICY

22.1 PURPOSE

This policy has been developed to protect all employees, service users, customers, and visitors from exposure to second hand smoke and to assist compliance with the Health Act 2006. Exposure to second hand smoke, also known as passive smoking, increases the risk of lung cancer, heart disease, and other illnesses. Ventilation or separating smokers and non-smokers within the same airspace does not completely stop potentially dangerous exposure.

22.2 POLICY

It is the policy of Cathodic Protection Co Ltd to uphold the right of all employees, contractors and visitors to work in a smoke free environment. With this in mind, the Company has restricted smoking to designated areas; the smoking shed in the yard, other than this, smoking is prohibited in all other areas on site.

Electric cigarettes better known as e-cigarettes are used as an alternative to conventional cigarette and also to aid smoking cessation and other alternatives to cigarettes like the use of inhaler type products. Employees must not use or have on their person electronic cigarettes in any work area where smoking is prohibited.

Appropriate "No Smoking" signs are clearly displayed at the entrances to and within all premises. These signs also apply to the use of electronic cigarettes. Smoking and the use of electronic cigarettes is prohibited in all Company vehicles and any other vehicle used for work purposes. This policy applies to all employees, consultants, contractors, customers and visitors.



22.3 IMPLEMENTATION/ENFORCEMENT

All members of staff are required to adhere to, and facilitate the implementation of the policy. Heads of Department and Managers are responsible for ensuring that all existing employees, consultants, and contractors are aware of the policy and their role in the implementation and monitoring of the policy.

22.4 NON-COMPLIANCE/COMPLAINTS

Employees wishing to register a complaint regarding an incident of non-compliance with this Policy should, in the first instance, contact their line manager. Employees may be subject to disciplinary action if they fail to comply with this policy. Those who do not comply with the smoking law are also liable to a fixed penalty fine and possible criminal prosecution.

22.5 HELP TO STOP SMOKING

The NHS offers a range of free services to help quit smoking. Visit or call the NHS smoking helpline: Smoke free 0800 022 4332

23. ALCOHOL AND DRUGS POLICY

This section has been replaced by CPOL20 Substance And Alcohol Misuse Policy

24. SECURITY

Due to the nature of the Company's business activities, it is essential that all employees fully understand their obligations with regard to security in all areas of the business.

24.1 SITE SECURITY

The Company has designated security workers who are responsible for ensuring the safety and security of site during and after normal working hours have finished.

It is all employee's responsibility to question any person they do not recognise and to check their identify in order to keep all personnel safe. Employees will not be penalised for checking any person's identity if they are not sure who they are.

Any employees who are expecting visitors to site must ensure that Reception is notified in the first instance.

24.2 SUSPICIOUS ACTIVITY

Staff must be aware of security measures and their part in making them work. The vigilance of all staff (including cleaning, maintenance and contract staff) is essential.

They must have the confidence to report anything suspicious, knowing that all reports will be taken seriously and regarded as contributions to the safe running of the premises.



Staff should be briefed to look out for:

- unusual packages, bags or other items in odd places
- people showing unusual interest in sensitive, important or less accessible area

24.3 SEARCHES

If it is deemed there are reasonable grounds, you may be subject to searches of your person, personal belongings being carried by you, your locker or your vehicle at any time whilst on Company premises. You will be accompanied by a third party and all searches carried out of your person will be carried out by someone of the same sex in a private room. Should you refuse a search you will be asked to justify your reasons for doing so. Should any items of concern be found without reasonable explanation then you may be subject to the disciplinary procedure. The Company reserves the right to call in the police at any stage. Please refer to the Company's Stop and Search Policy.

Theft of another employee's property, Company property, a visitor's or customer's property is classed as Gross Misconduct and may lead to summary dismissal.

24.4 BUYING OR SELLING OF GOODS

Under any circumstances, you are not permitted to buy or sell goods on Company premises unless you have the prior authority to do so by a Director of the Company.

24.5 CONFIDENTIALITY

You shall neither during your Employment (except in the proper performance of your duties or with the express written consent of the Company) nor at any time after the termination of the Employment except in compliance with an order of court:

- divulge or communicate to any person, Company, business entity or other organisation.
- use for your own purposes or for any purposes other than those of the Company or any Group Company; or
- through any failure to exercise due care and diligence, permit or cause any unauthorised disclosure of.

Company Confidential Information concerning other employees, customers, the Company's business, products, production methods, processes, dealings, transactions, economics and finances, trade secrets or other matters which have come to your knowledge during employment with the Company. If you are in doubt about any matter you must discuss it with your Line Manager.



These restrictions shall cease to apply to any information which shall become available to the public generally otherwise than through any breach by you of the provisions detailed in this section.

All documents relating to the business of the Company shall be and remain the property of the Company and shall be handed over by you to the Company on demand and in any event on the termination of your employment.

Any unauthorised disclosures will be dealt with via the Company's disciplinary procedure. If sufficiently serious, a single action of unauthorised disclosure may be classed as Gross Misconduct and may lead to summary dismissal.

24.6 COMPETITION & CONFLICT OF INTEREST

You should not, directly or indirectly, be engaged in, employed, interested or concerned with in any other trade, profession, agency or business which could in any way represent competition or a conflict of interest with those of the Company.

Where there is uncertainty or possibility that a conflict of interest might arise, you should discuss the matter with your Line Manager and obtain agreement from the Company before any such activity is entered into.

24.7 OTHER EMPLOYMENT

You are required to inform the Company of any other work you do outside of your employment with the Company, including voluntary unpaid work.

This is to ensure compliance with the Working Time Regulations 1998 which limits working time to an average of 48 hours per week.

24.8 STATEMENTS TO THE MEDIA & PUBLICATIONS

Any statements to reporters from newspapers, radio, television or any other form of media must only be given by a Director of the Company. You must not publish or submit for publication any letter or article or book relating directly or indirectly to the business or affairs of the Company without first obtaining consent from a Director of the Company.

25. STOP AND SEARCH POLICY

25.1 INTRODUCTION

The organisation reserves the right under this policy to exercise a stop and search of its employees. The purpose of this policy is to outline:

- why the organisation believes that it is necessary to enforce the right of stop and search.
- how employees will be chosen to be stopped and searched.
- the manner in which searches will be carried out; and
- where searches will take place.



This policy is not intended to deal with standard security checks implemented by the organisation. This policy applies to all employees, including management.

25.2 RIGHT OF STOP AND SEARCH

In accordance with this policy, the organisation reserves the right to:

- stop and search all employees.
- carry out a search of personal belongings and vehicles on the organisation's property; and
- carry out a search of all workplace areas, including lockers and any Company vehicles

Employees will be asked to consent to a search and will be required to complete a stop and search authorisation form in cases where it is deemed necessary to search an employee's person.

25.3 REASONS FOR SEARCHES

The organisation reserves the right to undertake searches of employees within its premises. This is to protect both the organisation and its staff from illegal activities such as:

- any theft of the organisation's property or property belonging to another; and
- the possession or supply of illegal substances.

Employees are advised that a search on an employee does not indicate that they are under any suspicion of wrongdoing and searches will be carried out at random. However, the organisation also reserves the right to stop and search an employee when it reasonably suspects that they have committed an illegal act.

25.4 LEVEL OF SEARCHES

The organisation reserves the right to undertake searches, including:

- a physical search of the employee.
- a search of all baggage (both personal and that owned by the organisation).
- a search of any vehicle on the organisation's property (both personal and owned by the organisation); and
- a search of all work areas (including but not limited to desks, lockers and cabinets, locked or otherwise).

The level of search required may be subject to change and the organisation will ensure that the level of search is fair and reasonable, taking into account all of the circumstances giving rise to it.

25.5 WHO WILL CONDUCT SEARCHES

Authorised personnel employed by the Company or from the Company's external HR Consultancy will undertake searches on behalf of the organisation.

The organisation will ensure that all authorised personnel have been trained in how to conduct searches to ensure that the employee's dignity is protected.



The organisation and the authorised personnel will take care to carry out searches in a fair manner and no search will involve overly invasive methods.

25.6 WHEN WILL SEARCHES OCCUR

Searches will occur at random when employees enter the building or leave the building, during any working hours and in circumstances where the organisation reasonably suspects that an employee has committed an illegal act

If a search is undertaken on a random selection of employees, a fair selection process will be used. The organisation will ensure that all authorised personnel have received training on how to conduct searches, to ensure that the selection of employees is not discriminatory.

25.7 CONDUCT OF SEARCHES

Physical search of the person

A physical search will be carried out in a private room, by an authorised person of the same sex where possible and in the presence of another authorised person. Employees have the right to request that a physical search is attended only by people of the same sex.

Search of baggage, vehicles and work areas

The organisation reserves the right to search both its own property (for example Company vehicles) and the personal belongings of any employee. Searches of baggage, vehicles and work areas will be carried out by an authorised person in the presence of the employee in question and another authorised person.

25.8 REFUSAL TO UNDERGO A SEARCH

If an employee refuses to undergo a search, no search will take place. The employee will be given a reasonable period of time to reconsider their refusal.

If the employee maintains their refusal to undergo a search, a member of management will consider the reasons for the refusal and, if these are deemed reasonable, no further action will be taken against the employee at that time.

The employee and member of management will be expected to complete a stop and search authorisation form, giving details of the reasons for the refusal.

If an employee unreasonably refuses to undergo a search, they will be suspended on full pay and the organisation will undertake a full investigation. This may lead to disciplinary action in line with the organisation's disciplinary policy, resulting in dismissal for gross misconduct where appropriate.

If the organisation believes that there is evidence that an employee has committed an illegal act, this will be reported to the police. The organisation may also stop and detain the employee under the "citizen's power of arrest".

25.9 DISCIPLINARY ACTION FOLLOWING A SEARCH



If a search reveals evidence that an employee has committed an illegal act, such as theft or the possession of an illegal substance, they will be given the opportunity to explain the situation before the decision to suspend is made.

However, the organisation reserves the right to suspend any employee on full pay and undertake a full investigation. This may lead to disciplinary action in line with the

organisation's disciplinary policy, resulting in dismissal for gross misconduct where appropriate. The organisation will also report the employee to the police.

25.10 DATA PROTECTION

Any personal data collected as part of the stop and search process, i.e. on the stop and search authorisation form, will be processed in accordance with the organisation's data protection policy. Data collected on the stop and search authorisation form is completed is held securely and accessed by, and disclosed to, individuals only for the purposes of the stop and search process.

25.11 COMPLAINTS

If an employee has a complaint about the way in which a search has been conducted, they can raise this informally with their line manager or external HR consultant. If an employee prefers to raise a formal complaint, they should refer to the organisation's grievance procedure.

25.12 EQUAL OPPORTUNITIES

In line with its equal opportunities and dignity at work policies, the organisation will take steps to ensure that this policy is not used in a discriminatory manner against any employee and that no individual is unfairly targeted. The organisation will take steps to ensure that employees' dignity is respected at all times.

25.13 REVIEW OF POLICY

The Company Director has the responsibility for ensuring the maintenance, review and updating of this policy.

26. CCTV POLICY

26.1 INTRODUCTION

This policy sets out how the organisation's approach to the use of CCTV in the workplace affects employees.

Cameras are located at various points around the premises including in the production areas and office space. Using CCTV is necessary for the organisation's legitimate interests. Cameras are installed for the purpose of detecting and preventing crime or misconduct by employees.

The data controller is the Director.

26.2 PURPOSE OF CCTV



The organisation reserves the right to use CCTV for monitoring the work of employees or finding out whether or not they are complying with the organisation's policies and procedures.

CCTV has been installed as a necessary and proportionate way of dealing any issues that may arise. The organisation will ensure that all cameras are set up in a way that ensures that there is minimal intrusion of staff privacy, and that any intrusion is fully justified.

In areas of surveillance, signs will be displayed prominently to inform employees that CCTV is in use. If workers access the relevant areas, their images will be captured on CCTV.

26.3 LIMITS ON USE OF CCTV

CCTV will not be operated in toilets, private offices or changing rooms, unless this is necessary for the investigation of a serious crime or there are circumstances in which there is a serious risk to health and safety or to the operation of the employer's business. CCTV will be used in this way only where it is a proportionate means of achieving the aim in the circumstances.

Covert CCTV will only ever be set up for the investigation or detection of crime or serious misconduct. The use of covert CCTV will be justified only in circumstances where the investigator has a reasonable suspicion that the crime or serious misconduct is taking place and where CCTV use is likely to be a proportionate means of securing evidence.

26.4 EVIDENCE FROM CCTV FOOTAGE

CCTV evidence may be used against an employee in disciplinary proceedings only where such evidence tends to show, in the reasonable belief of the employer, that they have been guilty of misconduct. The employee will be given a chance to see and respond to the images in these circumstances.

26.5 STORAGE OF CCTV FOOTAGE

Images from CCTV footage will be securely stored, and only authorised personnel will have access to them. This will normally include the Senior Management Team and could also include members of HR, an employee's line manager, and managers in the business area in which the footage is taken. However, information would normally be shared only in this way if the organisation has reason to believe that a criminal offence or misconduct has occurred. Surveillance information may also be shared with law enforcement agencies for the purposes of detecting crime.

The images will be retained only long enough for an incident to come to light and any investigation to be conducted.

Workers whose images are recorded have a right to view images of themselves and to be provided with a copy of the images. Workers making such a request should provide the organisation with a photograph or a description of themselves, together with the relevant time and date of the image, so that they may be easily identifiable.

Workers will be allowed access to such images within one month of the request, although in some cases, particularly where large amounts of data are processed, that time period may be extended to three months.



27. USE OF COMPUTERS, INTERNET, E-MAIL AND TELEPHONE POLICY

27.1 PURPOSE

In order to carry out their duties effectively, employees may have access to computers (including laptops), e-mail and internet facilities, the telephone system and Company mobile telephones.

Used appropriately, these systems facilitate and improve communication. However, their misuse can cause many problems, ranging from minor distractions to legal claims against the Company.

This policy clearly sets out the Company's view on the correct use of computers (including laptops), e-mail and internet facilities, the telephone system and Company mobile telephones.

If it is believed that an employee has breached this Policy, the disciplinary procedure may be instigated. If sufficiently serious, a single incident can amount to serious breach of Company Policy and will be treated as gross misconduct which may lead to summary dismissal.

27.2 AUTHORISED USE

Unless an employee has been expressively assigned or given permission, under no circumstances may you use Company computers (including laptops), email and internet facilities, the telephone system and Company mobile telephones.

The Company reserves the right to deny or remove any of the above equipment or facilities from you. Use of the above equipment and systems are available for communication on matters directly concerned with the business of the Company.

27.3 UNAUTHORISED USE

The Company will not tolerate the use of the above equipment or systems for any of the following:

- Any message that could contravene the Company's Equal Opportunities, Harassment and Bullying Policy.
- Personal use, where the extent of the use becomes disruptive to the Company's business and performance of the employee involved is affected or the cost to the business is deemed unacceptable
- On-line social networking
- On-line betting/ gambling
- Any form of fraudulent activity
- Accessing, storing and/or distributing illegal, obscene, hateful or pornographic material
- Downloading or distributing copyright information and/or any software available to the user
- Communicating confidential information about the Company, other employees or its customers or suppliers
- Hacking into unauthorised areas or unauthorised use of passwords
- Knowingly introducing viruses



27.4 MONITORING

The Company reserves the right to monitor employees' use of telephones, computer systems, e-mails and Internet, both during routine audits of the systems and in specific cases where a problem relating to excessive or unauthorised use is suspected.

In using these systems, you consent to the Company monitoring, modifying, recording and/or deleting any data or communication on it. In this respect, you have no expectation of privacy.

27.5 ACCESS & PASSWORDS

Access to information on the network, personal computers or laptops is controlled by individuals or through authorised password protection only. Abuse of unnecessary password protection, or fraudulently attempting to gain access to protected information would constitute gross misconduct and may lead to summary dismissal. Passwords are issued to individuals and should not be distributed or shared with others.

Employees may only use electronic resources for which access is approved. An employee has the responsibility to notify his or her supervisor if he or she has access to resources that are not necessary to perform his or her job, for which the employee's authorisation has expired, is given by mistake, or is otherwise unauthorised or excessive.

27.6 COMPUTER SOFTWARE & VIRUSES

The Company's computer network makes it vulnerable to viruses. Therefore, only authorised IT personnel have the authority to load new software onto the network system, PCs or laptops. Even then, software may be loaded only after having been checked for viruses. This software must be legal and not pirated.

The Company may remotely push software security updates to any device connected to Company systems including personal devices used to conduct Cathodic Protection Co Ltd business.

27.7 EMAIL

Communication plays an essential role in the conduct of our business. How employees communicate with people not only reflects on them as an individual but also on the organisation. As a result, the Company encourages its employees to follow the guidance below in relation to sending and receiving email:

- Emails must always be written in a professional business-like manner with an appropriate email signature.
- Distribution of bulk/broadcast/mass e-mail, voice mail or fax messages beyond an individual's area of responsibility are only allowed with appropriate approvals prior to distribution.
- Emails are strictly for business use only. Personal correspondence through email is not permitted unless the employee has express permission from a Company Director.
- Exercise extreme care when receiving emails with attachments from third parties, particularly unidentified third parties, as these may contain viruses.



- Employees should not use Company email addresses when accessing public websites for non-business purposes, such as on-line shopping or banking websites
- Employees should not act as a representative of Cathodic Protection Co Ltd or act in a way that would infer that one is a Company representative or act for and on behalf of the Company when not authorised to do so (e.g., contacting the media or government officials with the Company email, responding to complaints or questions about the Company business on internet discussion groups, etc.)
- The Company reserves the right to monitor and access individual's mailboxes in specific circumstances. These circumstances include, but are not limited to:
 - Suspicion that an employee has made defamatory remarks (sent or received)
 - Sending inappropriate or offensive emails in reference to the Company, a customer, visitor, partner or associate that could cause serious damage to the Company's reputation
 - Suspicion that evidence may be found in relation to unlawful activity
 - There is a business need to access a mailbox or electronically stored data in an employee's absence
 - Suspicion that an employee is engaging in illegal activities or disclosing confidential Company information
 - Any other suspected reason that may contravene Company Policies, Processes and Procedures

All emails will be treated, for the purpose of availability for monitoring, as business communications.

27.8 INTERNET

Access to the internet during working time should be limited to matters relating to your employment. You are not permitted to use the internet for personal use, including on-line social networking.

The Company does not impose any time limitation on work-related internet use. All Internet use is monitored, including sites accessed, and employees may be called upon to justify the amount of time spent on the internet or specific sites visited. The Company also reserves the right to deny internet access to any employee at work for justified reasons.

Employees should be aware that when visiting an internet site, information identifying the Company as the originator and details about the PC or other device being used may be logged. Therefore any activity an employee engages in via the internet whilst at work may have consequences which affect the Company. Employees should always comply with the terms and conditions governing the use of websites accessed.

If activities require additional software to be installed onto your PC then employees should ensure they speak to their Line Manager for further guidance and possible referral to an IT authoriser. Access to websites that do not have a business purpose may be blocked by the Company's systems. If there is a particular business need to access certain blocked sites, employees must seek authorisation from a Director



Some websites may require the Company to enter into license or contract terms. The terms should be sent for approval in advance or emailed to a Director. In most cases, there will be no objection to the terms, and it is recognised that the free information provided by the website in question may save the Company money. It should always be considered whether the information is from a reputable source and is likely to be accurate and kept up to date, as most such contract terms will exclude liability for accuracy of free information.

Employees should only store data in Company approved solutions such as Microsoft 365. The use of unapproved platforms to perform Cathodic Protection Co business such as Google Drive, Gmail, Box, Dropbox, etc are strictly prohibited unless prior authorisation from a Director has been received.

This section has been replaced by CPOL17 Mobile phone Policy

27.11 OTHER DEVICES – Tablets etc.

The use of all other devices is strictly limited to authorised break times. During normal working hours, personal devices should be turned off and stored securely.

Please note that the Company cannot be held liable for any personal belongings that are damaged or lost on Company property.

27.12 REVIEW

The Company Director are responsible for the updating and maintenance of this policy

28. SOCIAL MEDIA POLICY

28.1 STATEMENT

This policy applies to social media websites, personal blogs and all other personal web content even if created, updated or modified outside of working hours or when using personal IT systems. 'Social media' will be classed as a type of interactive online media that allows parties to communicate instantly with each other or to share data in a public forum. This includes social forums such as Twitter and Facebook. It also applies to blogs and video and image-sharing websites such as YouTube and Flickr.

The Company appreciates that many people enjoy using social media sites such as Facebook, Twitter, LinkedIn and Instagram, and does not want to interfere with employees' activities outside work. However, the Company has a right to protect its reputation, intellectual property, trade secrets, and confidential and sensitive information. This policy aims to provide guidelines to be observed when using social media.

28.2 RESPONSIBILITIES

Employees are not permitted to share any photos of work premises on their personal social media accounts.



Employees should be aware that social networking websites are a public forum, particular if they are part of a 'network'.

28.2.1 Responsibility for Statements Made Using Social Media

Employees should refrain from identifying themselves as working for the Company. It should not be assumed that entries on social media will remain private, and employees posting any content on a social media website should be aware of any potential negative impact it may have on either themselves or the Company.

28.2.2 Protecting Company Brand

The Company logo, brand names and other trademarks are property of the Company and must not be used without written permission from a Director.

28.2.3 Protecting Company Reputation

Employees should ensure they do not conduct themselves in a way that is harmful to the Company and its reputation. For example, they should not criticise the Company, clients or employees, post pictures of an embarrassing nature or make discriminatory or harassing comments. Employees must respect the corporate reputation of the Company and the privacy and feelings of other at all times.

Any employee who has a genuine complaint to make about a colleague or workplace matter should refer to the Company Grievance Policy.

28.2.4 Protecting Company Trade Secrets, Confidential and Sensitive Information

All employees have a duty to maintain confidentiality when using social media. Employees should ensure they do not reveal information about the Company including but not limited to, clients, business plans, policies, employees, financial information or internal discussions.

28.2.5 Responsibility for Who They 'Network' With

Professional networking can be beneficial for individuals and the Company. For example, the use of LinkedIn to network with business clients is encouraged as it allows employees to form effective relationships. It also allows employees to sustain relationships with those clients and contacts who are not based locally.

Employees who actively network using social media should ensure that as representatives of the Company, professionalism is maintained at all times. Upon leaving the Company, employees may be required to disclose their social media contacts to a Director.

Employees who use social media for social purposes only are advised not to accept requests from business clients and other external contacts related to the Company. This does not apply to requests from colleagues within the business.



Employees wishing to promote events or projects by the Company should do so via the Company social media accounts.

28.3 MONITORING

If an employee is suspected of breaching this policy, they will be required to fully co-operate with the Company's investigation into the matter. This may include allowing the Company access to your social media account to view information relevant to the investigation, such as the alleged posting(s).

Any employee found to be in breach of this policy may face disciplinary proceedings for Gross Misconduct.

28.4 REVIEW

The Company Directors have responsibility for ensuring the maintenance, review and updating of this policy.

29.0 EMPLOYEE WELLBEING STATEMENT

The Company is committed not only to our workforce's physical wellbeing, but their mental wellbeing as well. We have a commitment to employee health, the responsibilities of managers and others for maintaining psychological health, communicating and organisational commitment to handling individual issues.

As a Company who prioritises our staff above all else, we want to offer as much support as possible to our workforce in times when they need it most. The Directors have an open-door policy with any queries, concerns or issues that employees may have – whether they are work related or personal and we will always do our utmost to give advice and guidance where we can.

Wellbeing can be affected by a huge number of factors and sometimes, you may feel the need to talk to someone externally. We have pulled together some useful contact details for external organisations who may be able to help you with issues such as financial worries, mental health, family struggles or employment queries.

- **Samaritans.** To talk about anything that is upsetting you, you can contact Samaritans 24 hours a day, 365 days a year. You can call 116 123 (free from any phone), email jo@samaritans.org or visit some branches in person.
- **SANeline.** If you're experiencing a mental health problem or supporting someone else, you can call SANeline on 0300 304 7000 (4.30pm–10.30pm every day).
- **Papyrus HOPELINEUK.** If you're **under 35** and struggling with suicidal feelings, or concerned about a young person who might be struggling, you can call Papyrus HOPELINEUK on 0800 068 4141 (weekdays 10am-10pm, weekends 2pm-10pm and bank holidays 2pm–10pm), email pat@papyrus-uk.org or text 07786 209 697.
- **Campaign Against Living Miserably (CALM).** If you identify as **male**, you can call the Campaign Against Living Miserably (CALM) on 0800 58 58 58 (5pm–midnight every day) or use their webchat service.



- **Switchboard.** If you identify as **gay, lesbian, bisexual or transgender**, you can call Switchboard on 0300 330 0630 (10am–10pm every day), email chris@switchboard.lgbt or use their webchat service. Phone operators all identify as LGBT+.
- **Citizens Advice.** Free, confidential information and advice on your rights, including **money, housing, legal and other problems**. Call 03444 111 444, text 03444 111 445 or visit their website www.citizensadvice.org.uk
- **Money Advice Service.** Provides **free and impartial money advice**. Call 0800 138 7777. moneyadviceservice.org.uk
- **Turn2Us.** Helps people in financial difficulty to access **benefits, grants, and support services**. turn2us.org.uk

Mental Health and Money Advice. Online advice service for people experiencing issues with **mental health and money**. Run by Mental Health UK and Lloyds banking. Information is available in English and Welsh. mentalhealthandmoneyadvice.org

30. VEHICLES

This Vehicle Policy provides drivers with a set of guidelines, rules and procedures which reflect the Company's commitment to health and safety. The Company expects all drivers to adhere to the following points and regulations, which inform drivers of the Company's applicable policies and procedures regarding car use including the eligibility process for driving.

Before employees take possession of Company vehicles and before any other authorised driving, the Company expects that all drivers have read and understood the following guidelines and principles of car and road safety management.

30.1 AUTHORISED USE OF COMPANY VEHICLES

Employees wishing to use a Company Vehicle must have a valid UK driving license or international equivalent permitting them to drive in the UK, free from any endorsements (within reason). Employees will be required to complete a Driver Declaration which allows the Company to check for any penalties on their license with the DVLA. This declaration allows the Company to check your license at any point for a period of 3 years.

Employees who do not hold a valid license or do not complete a Drivers Declaration will not be permitted to drive any Company Vehicle and will not be covered by Company vehicle insurance. Any employee who drives a vehicle in this circumstance will be fully liable for any costs incurred as a result of any damage or repair costs.

Drivers must inform their manager / appropriate supervisor of any changes in their health that may affect their ability to drive. They must also report any changes in health status to the Driver & Vehicle Licensing Agency (DVLA) as required. If at any time the driver or appropriate manager feels that the driver's health may adversely affect their ability to drive, they should seek further advice from the Company Director.



30.2 MAINTENANCE AND ROADWORTHINESS

Regular maintenance and servicing are important to the safety, long life and dependability of all cars. Anyone driving a vehicle on Company business are responsible for ensuring it is roadworthy and legal. Employees should ensure that the vehicle is in a good mechanical and roadworthy condition, especially in regard to oil, water, fluid levels, steering, brakes, tyres and lighting. It is the driver's responsibility to ensure that after use of a Company vehicle, it is left in a clean condition with reasonably adequate fuel reserves (half a tank or more) for the next driver.

30.3 HEALTH AND SAFETY

Vehicle drivers are expected to pay exemplary attention to all traffic regulations and adhere to the Highway Code. Vehicles must be driven in a careful and responsible manner at all times and seat belts must be used at all times. It is also the responsibility of the driver to ensure all occupants of the vehicle are wearing seat belts.

All car drivers must not drive while under the influence of alcohol or drugs, including prescribed drugs that may affect your ability to drive. Failure by employees to observe this rule will result in disciplinary action in accordance with the disciplinary procedure, possibly resulting in summary dismissal for gross misconduct.

The Company understands tiredness, fatigue and stress (be it derived from work, domestic or social circumstances) can adversely affect safe driving ability. Please ensure when planning long journeys adequate breaks are taken along the way.

New legislation was announced Wednesday 1st March 2017 regarding the use of mobile phones while driving. The Company would like to remind all its employees that the use of a mobile telephone without an appropriate hands-free kit is prohibited. Any persons caught using their phones will now face a £200.00 fine and 6 points on their driving license.

30.4 OTHER

The use of any Company vehicle including hire car for the instruction of learner drivers is strictly prohibited.

In the event of a driving offence being committed and a Penalty or Fine being issued, the Company will not pay any fines incurred by employees. Any fixed penalty fines received by the Company in relation to drivers of Company vehicles will be sent for the attention of Payroll, who will deduct the cost of the fine, together with any additional administration charges, from the employee's expense claim or salary without gaining permission from the employee.

If, as part of any legal action, the Driver is disqualified from driving or their license is endorsed then the Company Director must be advised immediately.



30.5 VEHICLE SECURITY

The Company expects the use of correct procedures when securing vehicles -

- Never leave ignition keys in the vehicle whilst it is unattended making sure that all access points are locked, including the boot and all windows
- Activate any anti-theft device to the vehicle whenever left unattended.
- Park the vehicle where it can be clearly seen. Use attended car parks and if possible, leave the car in sight of an attendant.

Please ensure Company equipment in your possession is carefully looked after at all times and always removed from the vehicle.

30.6 REVIEW

The Company Director have responsibility for ensuring the maintenance, review and updating of this policy.

31. MODERN SLAVERY ACT 2015 STATEMENT

31.1 OBLIGATIONS

Legislation was introduced in November 2015 requiring all commercial Companies with a turnover, or group turnover of £36 million or more which are either incorporated in the UK or carry on a business in the UK to report annually on the steps that they have taken during the financial year to ensure that slavery and human trafficking are not taking place in their own business or in their supply chains.

As such, the Company and its subsidiaries turnover for the last financial year reported less than the stated amount and are not banded within this group. The Company is therefore not required to publicly report.

However, Cathodic Protections Co Ltd are absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking. Our industry is high risk in terms of modern slavery and as part of our corporate social responsibility we want to set our standards in this respect.

We ensure that our workforce and supply chains are in line with current UK and EU regulations regarding Equal Opportunities, Anti Bribery, Whistleblowing and Dignity at Work and have working policies in place to protect these requirements.

We are committed to ensuring that we maintain our due diligence, risk assessments, training and policies to ensure its corporate social responsibility and to uphold ethical standards.

31.2 DUE DILIGENCE

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence and reviews include:



- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans

31.3 TRAINING

The Company has reviewed its training needs in light of the introduction of the Modern Slavery Act 2015 and ensure that our employees are aware and have a full understanding on modern slavery to ensure they are able to fulfil their roles.

In addition, the Company will review its existing supply chains whereby all existing suppliers will be evaluated and assessed on their obligations to human trafficking and modern slavery.

This statement has been approved by the Company's Director, who will review and update it annually.

Employee Handbook Acknowledgement Form

I have received and read my copy of the Cathodic Protection Co. Ltd Staff Handbook. I understand that this handbook is intended as a guide for Human Resources policies, benefits, and general information, and that these guidelines are not to be construed as an employment contract.

Signed:

Print Name:

Date: