



Employee Handbook

Prepared by
Citation Ltd
15/1/2020

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About this Handbook

This Handbook has been drawn up by the Company to provide you with information on employment policies and procedures. It is important for you to read the Handbook carefully as this, together with your Contract of Employment, sets out your main terms and conditions of employment.

The information covers a wide range of subjects relating to your employment and in the event that information in this Handbook conflicts with terms and conditions as stated in your Contract of Employment, the Contract will take precedence.

If you have any questions or any part of the Handbook is unclear to you, please do not hesitate to raise any queries with the Office Manager.

It is important that you do this before signing that you have read, understood and are willing to abide by all the Company's terms and conditions.

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Annual holiday entitlement and authorisation

Entitlement

Full details of your holiday entitlement are in your Contract of Employment.

Carrying over holidays to the following year

You **MUST** take your full holiday entitlement during the holiday year. Holidays may not be carried forward into the next holiday year, nor will you receive payment for holidays not taken.

Request for holidays

In order to submit a request for holidays, you should complete the relevant form and have the holiday authorised by the Managing Director. If you have been given access to the self service holiday planner you should complete your holiday request online.

The amount of notice required is one month except for single days, when one week's notice is normally required.

All requests, providing they have been received in time, will be processed in date and time order.

No more than three Scaffolders, or two Drivers will normally be allowed to take holidays at any one time.

Length and timing of holidays

The Company will not normally agree a request for a holiday that involves more than two consecutive weeks.

Refusal of holidays

In the event that the Company has to refuse a holiday request because of business needs, the Company is not responsible for any financial commitment made by you prior to authorisation. You are therefore advised **not** to book holidays with tour operators, travel agents, hotels or passenger carriers, etc. until your holiday request has been authorised.

Adjustment to holidays

At the commencement of your employment you will be entitled to holiday leave in proportion to the holiday year remaining on the date when your employment began.

On leaving you will be entitled to holiday leave in proportion to the holiday year worked on the date when your employment ended. If you have been paid for more holidays than your entitlement then the balance will be deducted from your final payment. If you have been paid for fewer holidays than your entitlement then the balance will be paid to you with your final payment.

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Absence from work

Appointments

If you need to be absent from work to keep a medical, dental or other essential appointment, prior permission should always be obtained from Management. Payment for absences of this nature will be at the discretion of the Company. You must try to arrange such appointments outside normal working hours wherever possible and any regular appointments that have to be made during working hours must be supported by an appointment card. Any such absences from the workplace should be minimal.

Sickness and injury

Notification of absence

If you are absent from work without prior authorisation, you or someone on your behalf should notify the Managing Director by phone at least one hour before your start time on the first day of absence. Text messages and emails are not acceptable. Any unauthorised absence must be properly explained in that first contact and, if the absence continues, you must keep us fully informed. This applies to both short and long term situations and you will be expected to contact us on a daily basis during the first week and weekly thereafter.

Period of absence

If your sickness is for more than seven calendar days then you must provide the Company with a doctor's medical certificate. You must continue to provide medical certificates to cover the whole of the absence period.

Please note that the Company will review the attendance levels of all employees on a regular basis. In deciding whether to take further action in respect of sickness absence, the evidence of a medical certificate may not be sufficient and the Company may seek alternative medical information.

Returning from absence

On your return to work after absence because of sickness, irrespective of the length of absence, you must complete the Company's sickness form.

If you have been suffering from a notifiable disease such as food poisoning, measles, mumps, scarlet fever, etc., you must not report for work without clearance from your doctor.

Statutory Sick Pay (SSP)

The Company is responsible for paying SSP to you if you are eligible.

The maximum period for which SSP is payable is 28 weeks in one period of sickness absence and is paid at a rate specified by law. As with other earnings, SSP is subject to the deduction of income tax and all other normal deductions. We will inform you if you are not eligible for SSP.

SSP is paid in respect of qualifying days on which you are unable to work through sickness. Qualifying days are those days on which you would normally work. Generally SSP is not payable for the first three qualifying days of sickness which are known as "waiting days", but this may not always be the case if you are absent on more than one occasion within a short period of time.

SSP is only paid when the sickness absence is for four or more consecutive qualifying days.

"Family friendly" rights

Information on the current statutory provisions relating to the following is available from the Office Manager, with whom you should raise any queries.

- Leave and pay connected with the birth of a baby.
- Leave and pay on the adoption of a child.
- Unpaid parental leave.
- Unpaid time off for dependants

Flexible working

If you have at least 26 weeks continuous service with the Company you have a statutory right to ask for your contract of employment to be varied.

Any request for a variation must relate to:

- the hours you are required to work,
- the time when you are required to work, or
- the place where you are required to work (i.e. at home or at any place of business operated by the Company).

Requests must be made in writing and must include the following information:

- a statement that it is a request for a variation of your contract of employment,
- the variation you are seeking and the proposed commencement date,
- an explanation of the effect you think the change would have on the Company and how it might be dealt with.

On receipt of your formal request, the Company will arrange to meet with you to discuss it.

You can only make one request in any 12-month period for your contract of employment to be varied and, if the Company grants your request, the variation will be a permanent change to your contract of employment.

Jury service and attendance at court as a witness

If you are called for jury service or as a court witness, you will be granted unpaid leave of absence and you should claim for loss of earnings from the court. You will normally be given a form from the court asking for confirmation of your normal salary, which should be completed by the Company.

Public duties

The Company will allow reasonable time off without pay for designated public duties, such as a Justice of the Peace.

Adverse weather conditions

In the event of extreme adverse weather conditions, e.g. heavy snow or flooding, you are expected to make every reasonable effort, including the use of alternative means of transport, to arrive at work at your scheduled start time.

If you decide that the weather conditions are sufficiently severe to prevent you from travelling to work and arriving safely you may choose to:

- take the day(s) as annual leave,
- take the day(s) as authorised unpaid leave of absence.

In either case, you must telephone the Managing Director before your scheduled start time and inform them of the option you wish to take. If the Managing Director is not available, you must ensure that another member of Management is notified.

If you decide to travel to work and then subsequently find that the weather conditions prevent you from completing your journey, you must telephone the Managing Director as soon as possible and inform them of the exact circumstances. In this case, the Company, at its discretion having considered the circumstances, will decide whether or not you will receive full pay.

In any event, if your absence from work or lateness in arriving at work is considered reasonable because of extreme adverse weather conditions or difficulties with public transport, your absence or lateness will not be subject to the Company's disciplinary procedure, provided you have followed the notification process set out above.

General

If there are any aspects of this section that are unclear, you are encouraged to put any questions you may have to the Office Manager.

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General information

Insurance whilst on Company business

The Company's employers' liability insurance covers all employees for injury or death from an incident whilst working for the Company. This is only payable when the Company is found to have been negligent in its role as an employer.

Damage or loss to personal property

Compensation for damage to or loss of personal possessions will only be considered if the Company can be held to have been negligent. All damage or loss should be reported to Management immediately. Where there is evidence that the accident or loss occurred through lack of care on your part, compensation will not normally be paid and you should check whether a claim could be made on your personal insurance policy to cover such circumstances.

You are advised not to leave any personal possessions or valuables unattended on the premises.

Return of Company property

On the termination of your employment for whatever reason, you must return all Company property in your possession or for which you have responsibility. Failure to return all such items will result in the cost of the unreturned items being deducted from any monies outstanding to you. This is an express written term of your contract of employment.

Change of address or personal circumstances

You must always advise the Company, in writing, when you have a change in personal circumstances that will affect your personnel record. Particular examples include details of your address, telephone number, emergency contact, bank details and any qualifications.

You must also seek authority from the Company if you wish to take additional employment. In order to work more than an average of 48 hours in a week, you must sign an individual waiver form.

Health and safety

From the point of view of safety and appearance, work areas must be kept clean and tidy at all times.

You are required to take reasonable care of your own well-being and that of all other employees. The relevant health and safety notices are posted around the premises and you are expected to be familiar with their requirements.

If you have an accident or injury at work you must enter the incident in the Accident Book. The date, time and nature of the incident should be entered and whether it was witnessed.

Pay

Payslips

At the relevant payment interval you will receive a payslip giving details of all payments and deductions e.g. gross pay, income tax, national insurance, etc.

Overpayments

If you are overpaid for any reason you are required to notify the person who pays the wages. The amount of overpayment will normally be deducted from the following payment but if this would cause hardship, alternative arrangements to repay may be made. Any failure to report an overpayment may result in disciplinary action.

Income tax

In compliance with the law, you will receive a P60 each year detailing earnings and payment of income tax and National Insurance. This document should be kept in a safe place.

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Company facilities and amenities

Unless specified to the contrary in your Contract of Employment, the benefits and facilities in this section are discretionary and may be withdrawn or altered by the Company at any time.

Food and drink facilities

These facilities are provided for the convenience of all employees. Please ensure that all facilities are left in a clean and tidy condition after use. Care must be taken when using hot/electrical equipment and you must adhere to all health and safety rules concerning their use.

Please note that for health and safety reasons personal portable electrical appliances must not be brought onto the premises.

Site working

When working on a customer's site you are required to follow the customer's own site rules and procedures. There is no obligation on our customers to make their site services and facilities available to our employees.

Car parking

The Company provides limited car parking facilities for use by customers and employees. Cars must be parked sensibly and the Company does not accept liability for damage or loss to employees' private vehicles.

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Company procedures

Disciplinary procedure

Purpose

The Company firmly believes that the fairest way to resolve any problems relating to conduct or performance is to have a well-structured disciplinary procedure. The procedure is designed to help and encourage all employees to achieve and maintain the Company's standards of conduct, attendance and performance and should be looked upon as a corrective process.

Please read the following principles and procedures carefully as they form an important part of your terms and conditions of employment:

Principles

Apart from an informal verbal warning, you have the following rights in relation to disciplinary action:

- to be informed of the allegations of misconduct or poor performance to be addressed at any disciplinary hearing,
- to be accompanied by a work colleague or by an accredited trade union official,
- to appeal against any disciplinary action.

The procedure

Formal verbal warning

In the case of conduct, attendance or performance not reaching the required standard, the problem will be discussed with you at a disciplinary hearing where you will be given the opportunity to offer a satisfactory explanation. If the explanation is unsatisfactory, you will be issued with a formal verbal warning. The topics discussed at the meeting will be confirmed in writing to you and the verbal warning will remain on your file for six months.

Written warning

A written warning will be issued following a disciplinary hearing where there is a current formal verbal warning on your file and sufficient improvement has not been made or where the misconduct or poor performance is serious enough to warrant the Company bypassing the formal verbal warning stage. A written warning will remain on file for 12 months.

Final written warning

If there is still insufficient improvement in your conduct, or if your performance is still unsatisfactory, you will be asked to attend a further disciplinary hearing. If no satisfactory explanation is offered for the lack of improvement, you will be issued with a final written warning that will remain on file for 12 months.

If the misconduct is sufficiently serious to warrant only one warning but is not sufficiently serious to justify dismissal, a final written warning will be issued. You will be informed in your final written warning that any further misconduct or failure to meet the required standard will result in your dismissal.

Dismissal

Dismissal will normally result if you still fail to achieve the standard of conduct or performance required by the Company. You will be given every opportunity to offer an explanation for your failure to meet the required standards at a final disciplinary hearing. As with all previous stages of the disciplinary procedure you will be offered the right to be accompanied and the right to appeal against the decision.

If you are dismissed, you will be provided, as soon as is reasonably practicable, with the reasons for dismissal, the date on which your employment will terminate and details of how you may appeal.

In exceptional circumstances, the Company reserves the right, as an alternative to dismissal, to impose a penalty of suspension without pay for up to a maximum of five working days, together with a final written warning that will remain on file for 12 months.

General

You will always be given as much information as possible regarding the allegations of misconduct, or any documentation detailing the shortfall in performance or capability that will form the basis of the disciplinary hearing. You will also be given fair and reasonable notice of the date and time of the hearing and whenever possible the disciplinary hearing will be held during your normal working hours.

Any disciplinary action will only be taken after a full investigation of the facts, and if it is necessary to suspend you for this period of time, you will receive your normal rate of pay.

The Company reserves the right to vary the disciplinary procedure dependent on either the seriousness of the allegations of misconduct or capability to be addressed, or if you only have a short amount of service..

If you are a short service employee or are still within the probationary period, you may not be issued with any warnings before dismissal.

NB The Company reserves the right to deduct from pay the cost of any damage or loss to property or goods, which after a disciplinary hearing was found to have been caused by your negligence or vandalism.

Conduct covered

Conduct at work

The Company expects all employees to behave in a normal and reasonable manner. The following list provides examples of the type of conduct that the Company would expect:

- To be punctual for the start of work and to keep within the break times.
- To give regular attendance at work and to minimise all absenteeism.
- To be courteous, helpful and polite to all those with whom you have contact.
- To devote all your time and attention, whilst at work, to the Company and ensure that all its property including confidential information, records, equipment, information technology, etc., is kept safe and used correctly.
- To comply with all the Company rules and regulations and to observe and perform all the terms of your employment as set out or referred to in your Contract of Employment.
- Not to be involved with any company, client or agent who is in direct competition with the Company. You are expected to devote all your loyalty to the Company.

Conduct outside working hours

Normally the Company has no jurisdiction over employee activity outside working hours. Behaviour outside working hours will only become an issue if the activities adversely affect the Company.

Adverse publicity, bringing the Company name into disrepute, or actions that result in loss of faith in the Company, resulting in loss of business, or loss of faith in the integrity of the individual, will result in the disciplinary procedure being instigated.

The detriment suffered by the Company will determine the level of misconduct and it will also determine which disciplinary stage is most appropriate to suit the circumstances.

If the actions cause extreme embarrassment or serious damage to the Company's reputation or image, a decision may be taken to terminate the employment.

The Company's procedures covering disciplinary hearings and appeals still apply.

Gross misconduct

Gross misconduct will result in summary dismissal, which means you lose your right to notice or pay in lieu of notice.

Here is a list of offences that are normally regarded as "gross misconduct". It is not exhaustive, but it describes the kind of offence that can result in summary dismissal.

- Deliberate failure to comply with the published rules of the Company, including those covering cash handling, security, health and safety, equal opportunities, the Internet, etc.
- Deliberate falsification of records.

- The committing of offences against current discrimination legislation whilst acting on behalf of the Company.
- Fighting or assaulting another person.
- Using threatening or offensive language towards customers or other employees.
- Making yourself unfit to work by solvent abuse, drinking alcohol, taking of illegal substances or failing to follow medical instructions on prescribed drugs.
- Being in unauthorised possession of Company property.
- Being in possession of illegal drugs and substances or alcohol whilst on Company premises.
- Obscene behaviour.
- Behaviour likely to bring the Company into disrepute.
- Wilful and deliberate damage to or misuse of Company property.
- Refusal to carry out reasonable duties or instructions.
- Conviction on a criminal charge that is relevant to your employment with the Company.
- The misuse including use for personal gain, of confidential information in the course of working for the Company.
- Undertaking private work on the premises without permission.

Disciplinary appeal procedure

At each stage of the disciplinary procedure, you will be given the right of appeal. If you wish to exercise your right of appeal, you should put your reasons in writing to the Managing Director within five days of receiving written confirmation of the disciplinary decision taken against you. You will need to explain why you feel the decision is unfair, or inappropriate in relation to the matters addressed at the disciplinary hearing.

If you have any new information or evidence to support your appeal, please give details in full and include the names of any witnesses you may wish to call to support you in your appeal. This is in order that there will be sufficient time to investigate any additional information before the appeal hearing. You are entitled to be accompanied at the appeal hearing by a work colleague or by an accredited trade union official.

Although the purpose of the appeal is to review any disciplinary penalty imposed, it cannot increase the disciplinary penalty.

The decision of the person dealing with your appeal is final.

Grievance procedure

A grievance procedure is quite simply a way for all employees to discuss any problems, or air their views on any dissatisfaction that relates to their work. An informal discussion can often resolve matters, but if you wish to raise the grievance formally, it should be done in the following way.

Submit your formal written grievance to the Office Manager who will make every effort to hear your grievance within five working days. If you feel that you need help in putting your point of view across, you may ask a work colleague or an accredited trade union official to be present to help you explain the issue you are raising.

If you are not satisfied with the outcome of your meeting, tell the person who dealt with your grievance that you wish to take the matter further and intend to appeal against the outcome.

Submit your formal written appeal to the Managing Director within five days of receiving written confirmation of the grievance decision, including an explanation of why you are dissatisfied with the original decision. Every effort will be made to hear your appeal within five working days and you may ask a work colleague or an accredited trade union official to be present to help you. Although the Company will always be willing to try to resolve your grievance as amicably as possible, a decision reached at the appeal stage is final..

Public interest disclosures

Employees and workers who make public disclosures, generally about wrong doings in the workplace, are commonly referred to as "whistleblowers". Under certain circumstances "whistleblowers" are protected under legislation for disclosing information that is known as "qualifying". A qualifying disclosure must relate to:

- committing a criminal offence,
- failing to comply with a legal obligation,
- a miscarriage of justice,
- endangering the health and safety of an individual,
- environmental damage,
- concealing any information relating to the above.

All employees are legally protected if they make a qualifying disclosure relating to any of the above points. Anyone wishing to make a disclosure is strongly recommended to raise the issue with the Managing Director in the first instance so that, where appropriate, there is an opportunity to address the area of concern.

Where an employee wishes to make a disclosure that concerns a matter that cannot be dealt with through the above procedure, it should be raised with *Public Concern at Work*, an independent whistleblowing charity, on 0207 404 6609.

Claiming and accounting for expenses

If you incur or anticipate incurring legitimate expenses on the Company's behalf then you can claim them back on production of valid receipts. Claims can only be made for expenses incurred wholly in respect of business purposes.

Petty cash

Amounts may be claimed by presenting the receipt to the Office Manager.

Rights of search

The Company has a contractual right of search in order to combat misappropriation of Company property, stock losses, or if the Company genuinely believes that drugs or any illegal substances are on the premises. The right of search is to address problems relating to the above issues.

Under the rights of search procedure the Company may carry out random checks on the identity, person, and property, including vehicles of employees at any time whilst they are on Company premises or business. It is understood that such checks in themselves do not imply suspicion in relation to the individual concerned.

You may be asked to remove the contents of your pockets, bags, vehicle, etc., and you will have the right to be accompanied by a third party who is on the premises at the time of search.

If a personal search is deemed to be necessary, you will be entitled to be searched by a member of the same sex.

Any refusal will be regarded as a refusal to carry out a reasonable instruction and will normally result in dismissal.

The Company reserves the right to call the police for assistance at any stage.

Company vehicles

The use of Company vehicles requires express approval from Management and the private use of commercial vehicles requires further authorisation. Unauthorised passengers must not be carried in commercial vehicles, nor may any vehicle be used for personal gain.

Once the use of a vehicle has been approved you must ensure that the vehicle is kept clean and tidy, in a roadworthy condition, and that all normal engine and vehicle inspections are carried out at the designated intervals.

If you have an incident involving a vehicle, whether or not personal injury or vehicle damage occurs, you must make a full written report of the incident. All driving accidents will be investigated and if an investigation shows you to be at fault, you will be subject to disciplinary action. The Company also reserves the right to recover the insurance excess from you or the cost of the repairs if this is less than the excess.

You must produce your driving licence before permission to use a vehicle is first given and it must be produced at regular intervals thereafter, as notified by us. Any type of driving conviction or summons must be reported immediately to Management and you agree to allow us to access your online driving licence information.

You must comply with all statutory regulations and/or Company regulations regarding the recording of daily mileage, journeys undertaken and driving hours.

Whilst you may find it necessary to use a mobile phone during the course of your work, the Company prohibits the use of hand held mobile phones while driving and will not be liable for any fines or penalties incurred by you using a Company mobile phone unlawfully.

On termination of your employment you must return the vehicle to our premises. It is an express term of your contract of employment that failure to return the vehicle will result in the cost of its recovery being deducted from any monies outstanding to you.

Fines

Any fines or prosecutions arising from any motoring offence either moving or static will be your responsibility. Notices relating to such fines received by the Company will be passed to you. Fines not paid will be settled by the Company on receipt of the first reminder and deducted from any monies, including salary and expenses, due to you. In this event the Company will also charge you 50% of such fines (a minimum of £5.00) as an administration fee.

Use of private vehicles on Company business

The use of your own vehicle for Company business requires authorisation. Once authorised, you may claim a mileage allowance providing the Company has agreed the travel in advance.

You must have a valid licence to drive the vehicle and you are responsible for ensuring that your vehicle is in a roadworthy condition, with a valid MOT certificate (if applicable) and current vehicle tax, and that you have adequate insurance cover in place before undertaking any business travel. The Company will not accept any liability in the event of an accident, prosecution or fine.

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Company policies ***Equal opportunities and discrimination*** ***policy***

The Company recognises that discrimination is not only unacceptable, it is also unlawful.

The Company's aim is to ensure that no job applicant or employee is discriminated against, directly or indirectly, on any unlawful grounds.

By including this policy in the Employee Handbook, all employees are made aware that the Company will act in accordance with all statutory requirements and take into account any relevant codes of practice.

All job applicants will be considered solely on their ability to do the job. Interview questions will not be of a discriminatory nature.

All promotions will be made on merit in line with the principles of the policy.

Employees who have a disability will receive the necessary help, within reason, to enable them to carry out their normal duties effectively.

This policy will be assessed at regular intervals to ensure that equality of opportunity is afforded to all employees.

Harassment policy

The Company will not tolerate any form of harassment or bullying.

The purpose of this policy is to inform employees of the type of behaviour that is totally unacceptable and to explain what solutions there are to employees who may suffer harassment or bullying.

The Company intends to provide a neutral working environment in which no one feels threatened or intimidated.

Harassment is a discriminatory act and is also a criminal offence. It is very difficult to define as it can take many forms, but in the main it takes the form of unwanted behaviour by one employee towards another, for example:

- Patronising or belittling comments.
- Comments about appearance/body/clothes.
- Leering or staring at a person's body.
- Unwelcome sexual invitations or pressure.

- Promises or threats, concerning employment or conditions, in exchange for sexual favours.
- Displaying offensive or sexually explicit material.
- Touching, caressing, hugging or indecent assault.

Please remember the test is that the behaviour is UNWELCOME, UNINVITED AND UNRECIPROCATED.

Bullying is also difficult to define. Obvious examples are:

- Threats of or actual physical violence.
- Unpleasant or over repeated jokes about a person.
- Unfair or impractical work loading.

Procedure

If you encounter a problem of this nature, it is vital that you make the person responsible aware that his/her remarks or conduct are offensive to you. This should be done in a simple, straightforward way.

It is recognised that complaints of harassment or bullying are often of a sensitive or worrying nature and that it may be difficult to speak directly to the other employee involved. If this is the case, you should put your request in writing and hand it to the harasser or bully.

When or if the informal approach fails or if you believe that the harassment or bullying is of a very serious nature you must bring the matter to the attention of Management. If possible, you should keep notes of the harassment or bullying so that the formal complaint can be investigated, including the date, time and whereabouts of the act.

If you make a formal complaint it will be dealt with under the grievance procedure and all possible actions will be taken to separate you from the alleged harasser or bully.

If you bring a complaint of harassment or bullying you will not be victimised for having brought the complaint. However, following a full investigation, if the Company has grounds to believe that the complaint was brought with malicious intent, you will be subject to disciplinary action under the Company's disciplinary procedure.

The Company's appeal procedures apply to appeals against decisions made under the equal opportunities and discrimination policy and the harassment policy.

Anti-bribery policy

Introduction

The Company values its reputation for ethical behaviour and for financial probity and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Its aim therefore is to limit its exposure to bribery by:

- setting out a clear anti-bribery policy,
- establishing and implementing anti-bribery procedures as appropriate,

- communicating this policy and any relevant procedures to employees and to others who will perform services for the Company,
- undertaking appropriate due diligence measures before engaging others to represent the Company in its business dealings,
- monitoring and reviewing the risks and the effectiveness of any anti-bribery procedures that are in place.

Policy

The Company prohibits the offering, giving, solicitation or acceptance of any bribe (whether cash or other inducement)

- to or from any person or company (wherever they are situated and whether they are a public official or body or private person or company),
- by any individual employee, agent or other person or body acting on behalf of the Company,
- in order to gain any commercial, contractual or regulatory advantage for the Company in a way that is unethical,
- or in order to gain any personal advantage (pecuniary or otherwise) for the individual or anyone connected with the individual.

This policy prohibits any inducement that results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action that may not be solely in the interests of the Company or of the person or body employing them or whom they represent.

This policy is not meant to prohibit normal and appropriate hospitality or the giving of a gift on a festival or at another special time, providing they are customary in a particular market, are proportionate and are properly recorded.

Inevitably, decisions as to what is acceptable may not always be easy. If you are in any doubt as to whether a potential act constitutes bribery, the matter should be referred to the Office Manager before proceeding.

Employees' responsibility

The prevention, detection and reporting of bribery is the responsibility of all employees and the Company is committed to:

- encouraging employees to be vigilant and to report any suspicion of bribery,
- providing employees with suitable channels of communication and ensuring that sensitive information is treated appropriately,
- investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution,
- taking disciplinary action against any individual(s) involved in bribery.

Any suspicion of bribery should be reported in confidence to the Managing Director who has overall responsibility for bribery prevention.

Communication and representation policy

Introduction

The Company will take every step to communicate to all employees with particular respect to its products, services, and plans for the future, etc. It also encourages employees to express their views in terms of suggestions and opinions.

All statutory notices will be communicated.

The Employee Handbook

All employees will be given a copy of this handbook at the beginning of their employment with the Company. After that time a copy will always be available on the premises.

Staff meetings

The Company holds regular staff meetings. These are designed to feed information down throughout the Company and to give employees the opportunity to send views back up through the same system.

Because of the importance the Company places on these meetings, all invited employees are expected to make their attendance a high priority.

Trade Union membership and recognition

The Company recognises your right either to join or not to join a trade union of your choice.

The Company has no recognition agreement with any union and as a result no paid union officials will be allowed on the premises except for the purpose of representation at a disciplinary or individual grievance meeting or any associated appeal meeting.

Telephones (including mobile phones)

Employees may use the Company's telephone system for local calls within reason and in cases of personal emergency. If possible authority should be sought from Management before the call is made and if not as soon as possible afterwards. Private calls are not permitted from the Company's mobile phones. Personal mobile phones should be switched on during working hours so we can contact you when needed.

Postal mail

All posted mail delivered to the Company is normally opened centrally even if it is addressed as personal or has confidentiality marking. Therefore, no personal mail should be sent to the Company without permission (e.g. 'signed for' parcels) or personal mail sent out using the Company's system.

Computer technology

The Company will not tolerate any employee using Company computers for any purpose other than business use. No one may use any private software on the system. This is necessary to ensure no viruses contaminate the business systems.

The Internet

The Company subscribes to an Internet service in order to provide current information. No employee may use this facility for any personal reasons, including downloading or streaming from the Internet to computers or mobile devices.

The use of social networking sites for personal purposes during working time or on Company terminals or laptops is not permitted and is a breach of Company rules.

Employees using social networking sites away from work must ensure that, if adding personal news items, they do not include reference to the Company by name or by photograph, or to any employee, client, customer or any other person or organisation connected with the Company, or any of their relations or friends. Failure to comply with this policy will be treated as a serious breach of the rules and will result in disciplinary action being taken, up to and including summary dismissal.

Any use of social networking sites that brings the Company into disrepute, or breaches the equal opportunities and discrimination policy or harassment policy, will be regarded as gross misconduct and will result in summary dismissal.

GDPR - INFORMATION SECURITY

1. INTRODUCTION

We provide employees with access to various computing, telephone and postage facilities ("the Facilities") to allow them to undertake the responsibilities of their position and to improve internal and external communication

2. SCOPE AND APPLICABILITY

This Policy applies to all individuals that use or operate within our IT Systems, including networks, Laptops, desktops, telephones or any other facility that is provided for communication purposes.

This Policy applies to the use of:

- local, inter-office, national and international, private or public networks (including the Internet and Intranet) and all systems and services accessed through those networks;
- desktop, portable and mobile computers and applications (including personal digital assistants (PDAs);
- mobile telephones
- electronic mail (Email) and messaging services.

Observation of this Policy is mandatory and forms part of the Terms and Conditions of Employment. Misuse of the Facilities will be treated as gross misconduct and may lead to dismissal.

3. PURPOSE

This Policy sets out the Company's policy on the use of the Facilities and it includes:

- Responsibilities and potential liability when using the Facilities;
- The monitoring policies adopted by the Company; and
- Guidance on how to use the Facilities.

This Policy has been created to:

- Ensure compliance with all applicable laws relating to data protection, information security and compliance monitoring;
- Protect the Company and its employees from the risk of financial loss, loss of reputation or libel; and
- Ensure that the Facilities are not used so as to cause harm or damage to any person or organisation.

4. COMPUTER FACILITIES - USE OF COMPUTER SYSTEMS

To comply with this policy it should be noted that unless written prior authorisation has been received by departmental managers, the Facilities must be used for business purposes only.

In order to maintain the confidentiality of information held on or transferred via the Company's Facilities, security measures are in place and must be followed at all times. A log-on ID and password is required for access to the Company's network. Despite the use of a password, the Company reserves the right to override passwords and obtain access to any part of the Facilities.

Individuals are ultimately responsible for keeping passwords secure. They must not give it to anyone, including colleagues, except as expressly authorised by the Company. Passwords should be changed every 90 days.

Individuals are expressly prohibited from using the Facilities for the sending, receiving, printing or otherwise disseminating information which is the confidential information of the Company or its clients other than in the normal and proper course of carrying out duties for the Company.

5. IT SECURITY PROCEDURES

In order to ensure proper use of computers, all individuals must adhere to the following practices:

- Anti-virus software must be kept running at all times;
- All users accessing domain joined computer must seek IT permission to be able to use USB storage on the company network. If this permission is not requested, USB/CD media will be rendered un-accessible.
- Obvious passwords such as birthdays and spouse names etc. must be avoided. The most secure passwords are random combinations of letters and

numbers. Password minimum complexity requirements are in force when creating/updating existing passwords;

- When you are sending data or software to an external party by Data storage media always ensure that the disk has been checked for viruses by the Group IT Support Department and password protected if required, before sending it;
- All files must be stored on the network drive which is backed up regularly to avoid loss of information; and
- Always log off the network before leaving your computer for long periods of time or overnight.

6. SOFTWARE

Software piracy could expose both the Company and the user to allegations of intellectual property infringement. The Company are committed to following the terms of all software licences to which the Company is a contracting party. This means, in particular, that:

- Software must not be installed onto any of the Company's computers unless this has been approved in advance by the Group IT Support Department. They will be responsible for establishing that the appropriate licence has been obtained, that the software is virus free and compatible with the computer Facilities; and
- Software should not be removed from any computer nor should it be copied or loaded on to any computer without the prior consent of the IT Department.

7. LAPTOP COMPUTERS

At various times during employment with the Company, individuals may use a laptop. These computers, along with related equipment and software are subject to all of the Company's policies and guidelines governing non-portable computers and software (see two paragraphs in software section above). However, use of a laptop creates additional problems especially in respect of potential breaches of confidentiality. When using a laptop:

- Individuals are responsible for all equipment and software until it is returned. The laptop must be kept secure at all times;
- It should only be used by the person authorised to use the equipment and software;
- Individuals must not load or install files from any sources without the Group IT Support Department inspecting such files for viruses;
- All data kept on the laptop must be backed up regularly in order to protect data against theft or mechanical failure or corruption;
- Individuals should password protect confidential data on disks or on the hard drive to protect against theft;
- If individuals become aware of any mechanical, electronic, or software defects or malfunctions, they should immediately bring such defects or malfunctions to the attention of the Group IT Support Department;

- Upon the request of the Company at any time, for any reason, Individuals will immediately return any laptop, equipment and all software to the Company; and
- If for any reasons individuals are using their own laptop to connect with the Company's network or to transfer data between the laptop and any of the Company's computers it is essential that they ensure that they you have obtained prior consent from the Group IT Support Department, and their Department Head in order to comply with its instructions and ensure that any data downloaded or uploaded is free from viruses.

8. E-MAIL (INTERNAL OR EXTERNAL USE)

Internet e-mail is not a secure medium of communication – it can be intercepted and read. Do not use it to say anything that the Company or individuals would not wish to be made public. If individuals are sending confidential information by e-mail this should be sent using password protected attachments.

E-mail should be treated as any other documentation. If an individual would normally retain a certain document in hard copy you should retain the e-mail.

Do not forward e-mail messages unless the original sender is aware that the message may be forwarded. If you would not have forwarded a copy of a paper memo with the same information do not forward the e-mail.

E-mail inboxes should be checked on a regular basis.

As with many other records, e-mail may be subject to discovery in litigation. Like all communications, individuals should not say anything that might appear inappropriate or that might be misinterpreted by a reader or bring the Company into disrepute.

Individuals should not use the Company email system for private messages during the course of work activities unless absolutely necessary and in these circumstances the following message should be contained within the email that is sent:

"This e-mail does not reflect the views or opinions of our organisation"

Use of e-mail facilities for personal use is permitted during lunch breaks providing that:

- Such e-mails do not contain information or data that could be considered to be obscene, racist, sexist, otherwise offensive and provided that such use is not part of a pyramid or chain letter; and
- Such e-mails are not used for the purpose of trading or carrying out any business activity other than Company business.

In the event that individuals are away from the office and use e-mail as an external means of communication they must ensure that the autoreply service is used to inform the sender that they are unavailable. Failure to do so could lead to disciplinary action. If there is any doubt as to how to use these Facilities please contact the Group IT Support Department.

Viewing, displaying, storing (including data held in RAM or cache) or disseminating materials (including text and images) that could be considered to be obscene, racist, sexist, or otherwise offensive may constitute harassment and such use of the Facilities is strictly prohibited.

NB: The legal focus in a harassment case is the impact of the allegedly harassing material on the person viewing it, not how the material is viewed by the person sending or displaying it.

9. INTERNET

Use of the Internet, or Internet services, by unauthorised users is strictly prohibited. Individuals are responsible for ensuring that they are the only person using the authorised Internet account and services.

Downloading any files from the Internet using the computer Facilities is not permitted. If there is a file or document on the Internet that is required, the individual should contact the Group IT Support Department to make arrangements for it to be evaluated and checked for viruses. It will be at the discretion of the Group IT Support Department on whether to allow such download.

Viewing, downloading, storing (including data held in RAM or cache) displaying or disseminating materials (including text and images) that could be considered to be obscene, racist, sexist, or otherwise offensive may constitute harassment and such use is strictly prohibited.

NB: The legal focus in a harassment case is the impact of the allegedly harassing material on the person viewing it, not how the material is viewed by the person sending or displaying it.

Posting information on the Internet, whether on a newsgroup, via a chat room or via e-mail is no different from publishing information in the newspaper. If a posting is alleged to be defamatory, libellous, or harassing, the employee making the posting and the Company could face legal claims for monetary damages.

Using the Internet for the purpose of trading or carrying out any business activity other than Company business is strictly prohibited.

Subject to the above you are allowed to use the Internet for personal use during your lunch break. Use of the Internet for personal use at any other time is strictly prohibited.

For the avoidance of doubt the matters set out above include use of 3G/4G Data.

10. MONITORING POLICY

The Policy of the Company is that we monitor use of the Facilities.

The Company recognises the importance of an individual's privacy but needs to balance this against the requirement to protect others and preserve the integrity and functionality of the Facilities.

The Company may from time to time monitor the Facilities. Principle reasons for this are to:

- Detect any harassment or inappropriate behaviour by employees, ensuring compliance with contracts of employment and relevant policies including the health and safety, ethical and sex discrimination policies;
- Ensure compliance of this Policy;
- Detect and enforce the integrity of the Facilities and any sensitive or confidential information belonging to or under the control of the Company;
- Ensure compliance by users of the Facilities with all applicable laws (including Data Protection), regulations and guidelines published and in force from time to time; and
- Monitor and protect the well-being of employees.

The Company may adopt at any time a number of methods to monitor use of the Facilities. These may include:

- Recording and logging of internal, inter-office and external telephone calls made or received by employees using its telephone network (including where possible mobile telephones). Such recording may include details of length, date and content;
- Recording and logging the activities by individual users of the Facilities. This may include opening e-mails and their attachments, monitoring Internet usage including time spent on the Internet and web sites visited;
- Physical inspections of individual users computers, software and telephone messaging services;
- Periodic monitoring of the Facilities through third party software including real time inspections;
- Physical inspection of an individual's post; and
- Archiving of any information obtained from the above including e-mails, telephone call logs and Internet downloads.

If at any time an employee wishes to use the Facilities for private purposes without the possibility of such use being monitored, they should contact their Department Head or the nominated deputy. This person will consider such request and any restrictions upon which such consent is to be given. If such request is granted the Company (unless required by law) will not monitor the applicable private use.

The Company will not (unless required by law or in receiving legal or professional advice):

- Allow third parties to monitor the Facilities; or
- Disclose information obtained by such monitoring of the Facilities to third parties.

The Company may be prohibited by law from notifying employees using the Facilities of a disclosure to third parties.

Confidential and sensitive data is secured in the building. This is both in paper form (such as files of paperwork) and electronically (such as computers, storage devices and servers).

To improve the security and confidentiality of information, we require the following:

1. Do not allow entry to our premises to any unknown person
2. Ensure all visitors are signed in and are issued with an appropriate visitors pass and that they are advised to wear these passes visibly at all times
3. If you see someone you do not recognise and you cannot see that they are wearing a pass, ask to see their pass

4. If you see someone you do not recognise and they cannot show you a pass, immediately escort the person to reception to be signed in
5. Do not allow visitors to access roam the premises without being accompanied
6. Ensure you collect your visitors from reception
7. Ensure passes are returned and the visitor is signed out
8. Do not hold door open for people you do not recognise
9. Clock in and clock out in the instructed manner
10. Report anything suspicious to your manager

12. CLEAR DESK

To improve the security and confidentiality of information, we have adopted a Clean Desk Policy for computer and printer workstations.

This ensures that all sensitive and confidential information, whether it be on paper, a storage device, or a hardware device, is properly locked away or disposed of when a workstation is not in use. This policy will reduce the risk of unauthorised access, loss of, and damage to information during and outside of normal business hours or when workstations are left unattended.

Whenever a desk is unoccupied for an extended period of time the following will apply:

1. All sensitive and confidential paperwork must be removed from the desk and locked in a drawer or filing cabinet. This includes mass storage devices such as CDs, DVDs, and USB drives.
2. All waste paper which contains sensitive or confidential information must be placed in the designated confidential waste bins. Under no circumstances should this information be placed in regular waste paper bins.
3. Computer workstations must be locked when the desk is unoccupied and completely shut down at the end of the work day.
4. Laptops, tablets, and other hardware devices must be removed from the desk and locked in a drawer or filing cabinet.
5. Keys for accessing drawers or filing cabinets should not be left unattended at a desk.
6. Printers and fax machines should be treated with the same care under this policy:
 - a. Any print jobs containing sensitive and confidential paperwork should be retrieved immediately. When possible, the "Locked Print" functionality should be used.
 - b. All paperwork left over at the end of the work day will be properly disposed of.

13. GENERAL GUIDANCE

Never leave any equipment or data (including client files, laptops, computer equipment, mobile phones and PDAs) unattended on public transport or in an unattended vehicle.

Observation of this Policy is mandatory and forms part of the Terms and Conditions of Employment. Misuse of the Facilities or a breach of this policy may be treated as gross misconduct and may lead to dismissal.

GENERAL DATA PROTECTION REGULATIONS POLICY

This policy applies to:

- Apt Scaffolding Ltd;
- All regional staff or home workers operating on behalf of Apt Scaffolding Ltd.

This policy is operational from 25 May 2018.

The purpose of this policy is to enable Apt Scaffolding Ltd to:

- Comply with our legal, regulatory and corporate governance obligations and good practice
- Gather information as part of investigations by regulatory bodies or in connection with legal proceedings or requests
- Ensure business policies are adhered to (such as policies covering email and internet use)
- Fulfill operational reasons, such as recording transactions, training and quality control, ensuring the confidentiality of commercially sensitive information, security vetting, credit scoring and checking
- Investigate complaints
- Check references, ensuring safe working practices, monitoring and managing staff access to systems and facilities and staff absences, administration and assessments
- Monitor staff conduct, disciplinary matters
- Market our business
- Improve services

This policy applies to information relating to identifiable individuals e.g. staff, applicants, former staff, clients, suppliers and other third party contacts.

Apt Scaffolding Ltd will:

- Comply with both the law and good practice
- Respect individuals' rights
- Be open and honest with individuals whose data is held
- Provide training and support for staff who handle personal data, so that they can act confidently and consistently

Apt Scaffolding Ltd recognises that its priority under the DPA is to avoid causing harm to individuals. In the main this means:

- Complying with your rights,
- Keeping you informed about the data we hold, why we hold it and what we are doing with it,
- Keeping information securely in the right hands, and
- Holding good quality information.

Secondly, DPA aims to ensure that the legitimate concerns of individuals about the ways in which their data may be used are considered. In addition to being open and

transparent, Apt Scaffolding Ltd will seek to give individuals as much choice as is possible and reasonable over what data is held and how it is used. This includes the right to erasure where data is no longer necessary and the right to rectification where the data is incorrect. Full details are available in the Privacy Notice issued at the point of gathering the data.

Apt Scaffolding Ltd has identified the following potential key risks, which this policy is designed to address:

- Breach of confidentiality (information being given out inappropriately).
- Insufficient clarity about the range of uses to which data will be put — leading to Data Subjects being insufficiently informed
- Failure to offer choice about data use when appropriate
- Breach of security by allowing unauthorised access.
- Failure to establish efficient systems of managing changes, leading to personal data being not up to date.
- Harm to individuals if personal data is not up to date
- Insufficient clarity about the way personal data is being used e.g. given out to general public.
- Failure to offer choices about use of contact details for staff, clients workers or employees.

In order to address these concerns, to accompany this policy, we have an accompanying Information Security policy and we will issue Privacy Notices to explain what data we have, why we have it and what we will do with it. The Privacy Notice will also explain the data subjects' rights. We will offer training to staff where this is necessary and appropriate in the circumstances to ensure compliance with DPA. Such training will vary according to the role, responsibilities and seniority of those being trained.

We aim to keep data only for so long as is necessary which will vary from according to the circumstances.

We have no intention to transfer data internationally.

The person responsible for Data Protection is currently Mahshid Beaykitary with the following responsibilities:

- Briefing the board on Data Protection responsibilities
- Reviewing Data Protection and related policies
- Advising other staff on Data Protection issues
- Ensuring that Data Protection induction and training takes place
- Notification
- Handling subject access requests
- Approving unusual or controversial disclosures of personal data
- Approving contracts with Data Processors
- Ensuring Data is stored securely
- Maintain a Data Audit and keep this up to date
- Reporting breaches to the Information Commissioners Office and the relevant Data Subject(s)

Significant breaches of this policy will be handled under Apt Scaffolding Ltd.'s disciplinary procedures which may amount to gross misconduct.

Subject Access Request

Any subject access requests will be handled by Mahshid Beaykitary

Subject access requests must be in writing. All staff are required to pass on anything, which might be a subject access request to Mahshid Beaykitary without delay. The

applicant will be given their data within 1 month unless there are complexities in the case which justify extending this to 2 months. You will be notified of any extensions to the deadline for response and the reasons as soon as possible.

We have the right to refuse a subject access request where data is requested at unreasonable intervals, manifestly unfounded or excessive. You will be notified of the reasons as soon as possible.

Where the individual making a subject access, request is not personally known to Mahshid Beaykitary their identity will be verified before handing over any information.

The required information will be provided in a permanent and portable form unless the applicant makes a specific request to be given supervised access in person.

You have the right to request the information we hold is rectified if it is inaccurate or incomplete. You should contact Mahshid Beaykitary and provide with the details of any inaccurate or incomplete data. We will then ensure that this is amended within one month. We may, in complex cases, extend this period to two months.

You have the right to erasure in the form of deletion or removal of personal data where there is no compelling reason for its continued processing. We have the right to refuse to erase data where this is necessary in the right of freedom of expression and information, to comply with a legal obligation for the performance of a public interest task, exercise of an official authority, for public health purposes in the public interest, for archiving purposes in the public interest, scientific research, historical research, statistical purposes or the exercise or defence of legal claims. You will be advised of the grounds of our refusal should any such request be refused.

Training policy

Introduction

Day to day training is the responsibility of Management who can call on specialised skills and knowledge within the Company and from external sources for advice on training matters.

Aims

The aims of the policy are:

- To provide induction training for all new employees, including relevant health and safety information.
- To provide job specific training to all new employees and to existing employees who are changing job within the Company, including health and safety information.
- To identify the longer-term development needs of those employees with potential to progress beyond their present job and to meet those needs when they are consistent with the needs of the Company.

Procedures

The procedures for training are:

- A record will be kept for each employee showing the training received.
- The training records will be monitored on a regular basis and the needs checked.

- All training programmes will be monitored and revised as necessary in order to meet changing business needs.

The Company will provide any necessary training and will meet the costs involved.

In consideration for and as a condition of the Company's obligations and as a term of your employment, you agree to attend your training courses diligently and apply the whole of your energies during the training to the acquisition of the skills and knowledge taught or otherwise made available in connection with the training and to the successful achievement of all work, tests and examinations set in connection with the training. If you fail to successfully complete the training course, you must repay to the Company the fees associated with the training course.

Additionally, if an employee fails to complete the training or their employment ends within one year of completing any external training course for any reason except redundancy, the employee must reimburse the cost of any training on a pro-rata basis.

Employees will be required to sign an 'Agreement to deduct from pay' prior to starting any external course, which authorises the Company to make these deductions.

Lay off/short time working

If a situation arises where there is a reduction of work, or there is any other occurrence that affects the normal running of the business, the Company has a right to either lay off without pay other than Statutory Guarantee Pay or implement shorter working hours. This procedure is in line with your terms and conditions of employment.

The Company also reserves the right to select the employees best suited to carry out whatever work is available.

Employees will be offered alternative work wherever possible.

Employees who are laid off must still be available for work as and when necessary since continuity of service is not affected by any period of lay off.

The Company will pay Statutory Guarantee Pay in accordance with the current government regulations.

Any employee who is laid off for longer than the Statutory Guarantee Pay period will be given a letter to take to the relevant government agency. Employees should then be able to sign on as temporarily unemployed, even though they will still be employed by the Company.

Redundancy policy

If a redundancy situation arises, for whatever reason, the Company will take whatever steps are reasonable in an effort to avoid compulsory redundancies, for example:

- Analyse overtime requirement.
- Reduce hours.
- Lay off with Statutory Guarantee Pay.
- Ask for voluntary redundancies, whether anyone has plans to retire or is considering a career move.

If compulsory redundancies are necessary, employees will be involved and consulted at various meetings to discuss selection criteria, any alternative positions, and be given every opportunity to put forward any views of their own.

Employees will be given the opportunity to discuss the selection criteria drawn up. The Company reserves the right to reject any voluntary applications for redundancy if it believes that the volunteer has skills and experience that need to be retained for the future viability of the business.

Drugs and alcohol policy

The Company is committed to maintaining a healthy, safe and productive working environment for its employees. The Company recognises the impact that drugs and alcohol may have on an individual's ability to work safely and correctly and aims to ensure a working environment free from the inappropriate use of substances and where employees are able to carry out their duties in a safe and efficient manner.

The use of drugs or the consumption of alcohol by employees is inappropriate at any time during working hours and before work. If your doctor prescribes drugs that may affect your ability to perform work, you must discuss this with your Manager.

The dispensing, distribution, possession, use, sale or offering to buy controlled drugs or alcohol at work is prohibited. Any such activity (including reasonable suspicion) will be reported to the police. Any employee found to be in breach of these rules will be liable to disciplinary action that may result in dismissal. This will apply whether or not there is any actual threat to health and safety.

Testing for illegal substances and alcohol

The Company reserves the right to introduce testing, including random testing, for illegal substances and alcohol.

When testing for alcohol a trained employee will use a standard breathalyser. When testing for drugs a trained employee will use an oral fluid test device from a Food and Drugs Administration accredited or similar supplier.

Any refusal to be tested will be regarded as a refusal to carry out a reasonable instruction and will normally result in dismissal.

Smoking policy

It is illegal to smoke in enclosed or substantially enclosed workplaces and the Company has a policy that prohibits smoking except in the designated outside areas. Smoking in commercial and 'pool' vehicles is expressly prohibited. This policy applies to all employees and to visitors to the premises.

Failure to comply with this policy will result in disciplinary action and possible criminal prosecution.

This policy also applies to the use of e-cigarettes.

Dress code policy

Employees represent the Company whenever they meet customers and suppliers and we would ask that employees' appearance should be smart and businesslike at all times.

Employees who have been given a uniform or name badge should wear them at all times whilst on Company business. Uniforms must be kept clean, pressed and presentable.

It should be noted that employees should be mindful when wearing Company branded clothing in public either in or out of working hours and be seen to be professional and behaving appropriately. Adverse publicity, bringing the Company name into disrepute, or actions that result in loss of faith in the Company, or loss of faith in the integrity of the individual, will result in the disciplinary procedure being instigated.

Any personal protective equipment that is issued by the Company must be worn at the relevant time. Failure to wear this equipment may result in disciplinary action.

