



HEALTH, SAFETY, WELFARE AND HYGIENE

A) SAFETY

1. You should make yourself familiar with our Health and Safety Policy and your own health and safety duties and responsibilities, as shown separately.
2. You must not take any action that could threaten the health or safety of yourself, other employees, customers or members of the public.
3. Protective clothing and other equipment which may be issued for your protection because of the nature of your job must be worn and used at all appropriate times. Failure to do so could be a contravention of your health and safety responsibilities. Once issued, this protective wear/equipment is your responsibility.
4. You should report all accidents and injuries at work, no matter how minor, in the accident book that can be found in the office.

B) REFRESHMENT MAKING FACILITIES/VENDING MACHINE

We provide refreshment making facilities for your use, which must be kept clean and tidy at all times.

C) KITCHEN

We provide a kitchen for your use, which must be kept clean and tidy at all times.

D) HYGIENE

1. Any exposed cut or burn must be covered with a first-aid dressing.
2. If you are suffering from an infectious or contagious disease or illness such as rubella or hepatitis you must not report for work without clearance from your own doctor.
3. Contact with any person suffering from an infectious or contagious disease must be reported before commencing work.



EQUAL OPPORTUNITIES POLICY

A) STATEMENT OF POLICY

1. We recognise that discrimination is unacceptable and although equality of opportunity has been a long standing feature of our employment practices and procedure, we have made the decision to adopt a formal equal opportunities policy. Breaches of the policy will lead to disciplinary proceedings and, if appropriate, disciplinary action.
2. The aim of the policy is to ensure no job applicant, employee or worker is discriminated against either directly or indirectly on the grounds of race, colour, ethnic or national origin, religious belief, political opinion or affiliation, sex, marital status, sexual orientation, gender reassignment, age or disability.
3. We will ensure that the policy is circulated to any agencies responsible for our recruitment and a copy of the policy will be made available for all employees and made known to all applicants for employment.
4. The policy will be communicated to all private contractors reminding them of their responsibilities towards the equality of opportunity.
5. The policy will be implemented in accordance with the appropriate statutory requirements and full account will be taken of all available guidance and in particular any relevant Codes of Practice.
6. We will maintain a neutral working environment in which no employee or worker feels under threat or intimidated.

B) RECRUITMENT AND SELECTION

1. The recruitment and selection process is crucially important to any equal opportunities policy. We will endeavour through appropriate training to ensure that employees making selection and recruitment decisions will not discriminate, whether consciously or unconsciously, in making these decisions.
2. Promotion and advancement will be made on merit and all decisions relating to this will be made within the overall framework and principles of this policy.
3. Job descriptions, where used, will be revised to ensure that they are in line with our equal opportunities policy. Job requirements will be reflected accurately in any personnel specifications.
4. We will adopt a consistent, non-discriminatory approach to the advertising of vacancies.
5. We will not confine our recruitment to areas or media sources which provide only, or mainly, applicants of a particular group.
6. All applicants who apply for jobs with us will receive fair treatment and will be considered solely on their ability to do the job.
7. All employees involved in the recruitment process will periodically review their selection criteria to ensure that they are related to the job requirements and do not unlawfully discriminate.
8. Short listing and interviewing will be carried out by more than one person where possible.
9. Interview questions will be related to the requirements of the job and will not be of a discriminatory nature.
10. We will not disqualify any applicant because he/she is unable to complete an application form unassisted unless personal completion of the form is a valid test of the standard of English required for the safe and effective performance of the job.
11. Selection decisions will not be influenced by any perceived prejudices of other staff.

C) TRAINING AND PROMOTION

1. Senior staff will receive training in the application of this policy to ensure that they are aware of its contents and provisions.
2. All promotion will be in line with this policy.

D) MONITORING

1. We will maintain and review the employment records of all employees in order to monitor the progress of this policy.
2. Monitoring may involve:-
 - a. the collection and classification of information regarding the race in terms of ethnic/national origin and sex of all applicants and current employees;
 - b. the examination by ethnic/national origin and sex of the distribution of employees and the success



- rate of the applicants; and
 - c. recording recruitment, training and promotional records of all employees, the decisions reached and the reason for those decisions.
3. The results of any monitoring procedure will be reviewed at regular intervals to assess the effectiveness of the implementation of this policy. Consideration will be given, if necessary, to adjusting this policy to afford greater equality of opportunities to all applicants and staff.

ANTI-BRIBERY AND CORRUPTION POLICY

Bribery and corruption remain a major issue in world trade and finance, despite the many dedicated efforts to prevent them. Our legal obligations are now more than ever, greater as from 1 July 2011 when the Bribery Act 2010 came into force in the UK. That Act affects us, as a UK company, if bribery occurs anywhere in our business.

Corruption and bribery are very damaging to the societies in which they occur. They divert money and other resources from those who need them most. They hinder economic and social development. They damage business, not least by increasing the cost of goods and services.

We run our business with integrity. All of us must work together to ensure that they remain untainted by bribery or corruption. This policy is the core of that effort.

INTRODUCTION

This policy sets out the steps all of us must take to prevent bribery and corruption in our business and to comply with relevant legislation and requirements.

WHAT ARE BRIBERY AND CORRUPTION?

Corruption is the misuse of office or power for private gain. Bribery is a form of corruption. It means:

- giving or receiving money, gifts, meals, entertainment or anything else of value;
- as an inducement to a person to do something which is dishonest or illegal;
- in the course of doing business.

In other words, bribery is designed to make a person act wrongly to secure an advantage for the giver.

WHO CAN BE INVOLVED IN BRIBERY AND IN WHAT CIRCUMSTANCES?

Bribery and corruption may be committed by:

- our employees, officers or directors;
- anyone they authorise to do things on their behalf;
- our representatives and other third parties who act on our behalf;
- our suppliers;
- even our customers (for example, they might try to induce one of our people to give them more favourable terms).

Bribery can occur in both the public and private sectors. The person receiving the bribe is usually in a position to influence the award or the progress of business, often a government or other public official.

THE LEGAL POSITION ON BRIBERY

Bribery and corruption are criminal offences in most countries where we do business. UK-incorporated companies, including ourselves, are subject to the Bribery Act 2010. Under the Act, it is illegal:

- to pay or offer to pay a bribe;
- to receive or agree to receive a bribe;
- to bribe a foreign public official;
- for a commercial organisation, to fail to have adequate procedures in place to prevent bribery.



It does not matter whether the bribery occurs in the UK or abroad. A corrupt act committed abroad may well result in a prosecution in the UK. Nor does it matter whether the act is done directly or indirectly.

OUR POSITION ON BRIBERY

Our position is simple: we conduct our business to the highest legal and ethical standards. We will not be party to corruption or bribery in any form. Such acts damage our reputation and expose us, and our employees, to the risk of fines and imprisonment.

RISKS OF NOT ACTING WITH INTEGRITY

Involvement in bribery or corruption carries many risks. Among them are:

- a company which pays — or accepts — bribes is not in control of its business and is at risk of blackmail;
- the UK Bribery Act is one of the widest-ranging pieces of legislation in the field. It covers any corrupt act by a UK company (or by a foreign company trading here) wherever it occurs;
- if the Company is found guilty of bribery — or even of failing to have adequate procedures in place to prevent bribery — it will be subject to large fines;
- any person guilty of bribery will be subject to fines and/or imprisonment (up to 10 years under the Bribery Act);
- a public exposure, or even allegation, of bribery would entail severe reputational damage. Banking or supply facilities might be withdrawn or be available on much less favourable terms, and we could be blacklisted as an approved tenderer for both public and private sector contracts;
- the cost of our insurance cover could increase very significantly; and
- good people will not want to work for us.

BENEFITS OF INTEGRITY

Equally, there are very clear benefits to acting with propriety. These include:

- we increase our chances of being selected as a supplier in both the public and private sectors. The supply chain organisations of our large customers cannot deal with us unless we have an effective anti-bribery programme in place;
- we remain in good standing with our banks and our own suppliers and they will want to keep doing business with us;
- a business with high ethical standards is a good place to work. It promotes clear communication and lets us act with confidence.

WHAT ARE INDICATORS OF BRIBERY?

Common indicators of corruption include those listed below. There may well be others. Examples include:

- **Payments** are for abnormal amounts (e.g. commission), or made in an unusual way, e.g. what would normally be a single payments is made in stages, through a bank account never previously used, or in a currency or via a country which has no connection with the transaction;
- **Process** is bypassed for approval or sign-off of terms or submission of tender documents, payments, or other commercial matters; those whose job it is to monitor commercial processes may be prevented from or hindered in doing so;
- **Individuals** are secretive about certain matters or relationships and/or insist on dealing with them personally. They may make trips at short notice without explanation, or have a more lavish lifestyle than expected;
- **Decisions** are taken for which there is no clear rationale;
- **Records** are incomplete or missing.



AREAS OF SPECIFIC RISK

Certain areas of business are often at higher risk than others. These include:

- **Gifts and hospitality:** This is covered separately in the Gifts and Hospitality Policy. Please familiarise yourself with this.
- **Facilitation payments:** These are also known as 'grease' payments. Usually they are small amounts paid to officials to provide goods or services to which we are already entitled, e.g. speeding up the grant of a licence or permit, or delivering goods which we have ordered and paid for. In some cases they may be larger, e.g. a significant amount is demanded to complete a project (e.g. the last mile of a motorway, or section of a major development).
- Facilitation payments are common in many countries, particularly those where public officials are poorly paid. You may be told that this is normal practice and that we will be disadvantaged unless we do the same. But such payments are illegal under the UK Bribery Act and in many other countries where we do business. Whatever their size, we do not offer or pay them. If you are faced with a request, or a demand, for such a payment, please contact one of the directors immediately.
- Political contributions: You should be aware that such contributions can be (or be seen as) bribes in disguise. We do not make donations to political parties. No individual is to make a donation stated to be, or which could be taken to be, on our behalf without the prior approval of the Board. You may, of course, make political donations in a personal capacity but please be sensitive to how such contributions could be perceived, especially by those who are aware of your connection with the company.
- Charitable donations: Bribes may even be disguised as charitable donations. Whilst individuals may of course make personal donations to charity, they should not do so on behalf of the company without prior approval from management.

LOCAL CIRCUMSTANCES

We understand that different parts of the world have different social and cultural customs. Subject to that position, we understand the need to be sensitive to local customs. For example, there are cultures in which refusing (or even failing to offer) a gift is considered impolite, and could alienate a key contact.

EXCEPTIONAL CIRCUMSTANCES

In some circumstances a payment is justifiable. If one of our people is faced with a threat to his or her personal safety or that of another person if a payment is not made, they should pay it without fear of recrimination. In such cases, however, a director must be contacted as soon as possible, and the payment and the circumstances in which it was made must be fully documented and reported within five working days.

RISK ASSESSMENT

Risk in our business will vary by area. The Directors are responsible for assessing the level of risk to which the business is subject, and, putting in place any measures additional to those outlined in this policy he considers are required.

RECORDS

It is essential that we keep full and accurate records of all our financial dealings. Transparency is vital; false or misleading records could be very damaging to us. Under money laundering regulations our lawyers and accountants are obliged to report anything which appears to be irregular.

MONITORING

Everyone in the company must observe this policy. It will be monitored regularly to make sure it is being adhered to. In doing this they act in the interest of our business as a whole and it is therefore the responsibility of all of us to help them in this.



YOUR RESPONSIBILITY

Everyone in the Company is responsible:

- for reading and knowing the contents of this policy;
- for keeping full and accurate records of all cases where bribery is suspected;
- for reporting cases where you know, or have a reasonable suspicion, that bribery has occurred or is likely to occur in our business.

WHAT TO DO IF YOU THINK SOMETHING IS WRONG

Each of us has a responsibility to speak out if we discover anything corrupt or otherwise improper occurring in relation to our business. We cannot maintain our integrity unless we do that. If you discover or suspect corruption, whether:

- by another member of staff;
- by a third party who represents us;
- by one of our suppliers or competitors;
- or by anyone else—perhaps even a customer seeking to get better terms from us

Please report it to a director as soon as possible. We will investigate all allegations of corruption immediately.

CONCLUSION

We take this Policy very seriously. Our reputation comes from the way we act. Anyone who pays bribes on our behalf will be subject to disciplinary action. Equally, we will not penalise someone who loses business through not paying a bribe.



ENVIRONMENT POLICY

POLICY STATEMENT

1. The company is aware of its responsibilities in relation to the wellbeing of its employees in providing a suitable environment in which to work and operate. This policy reflects the importance of environmental concerns and issues relating to the workplace and the protection and welfare of its employees, visitors and other persons who may be affected.
2. To ensure that it complies with all statutory requirements, the company will take steps.
 - a. To ensure that effective environmental procedures are developed and maintained within the company.
 - b. To ensure that a positive environmentally responsible safety culture is developed and that each employee understands and recognises their responsibilities.
 - c. To ensure that employees are aware of their responsibilities both within the concepts of good safety concerns but also in relation to the protection of the environment within which they work.
 - d. To achieve continual improvement in the conditions for employees, visitors and others who may be affected by the company's activities.
 - e. To work with employees, suppliers and contractors to minimise environmental impact.
 - f. To encourage the protection of the environment and to work within acceptable guidelines to ensure the protection of employees.
 - g. To encourage the responsible sourcing of products to reduce environmental impact and, wherever possible, to source materials locally.
 - h. To encourage the development of business with local organisations and communities.

IMPLEMENTATION

3. In working to achieve our objectives, the company will:
 - Periodically undertake a review of the policy and update where necessary.
 - Monitor and review the environmental impacts of the business.
 - Work with all employees to constantly attempt to improve the standards in place.
 - Select suppliers and contractors having regard to their own environmental practices wherever possible.
 - Educate employees on their safety and environmental responsibilities through suitable training and communication of information.
 - Ensure that all employees work in a safe and decent environment with acceptable working conditions suitable to their employment.
 - Work in partnership with others to improve environmental conditions and to achieve more sustainable business practices.
4. The company is committed to ensuring that this policy remains legally compliant and consistent with current practices. It will be subject to regular review and update where necessary.



HUMAN RIGHTS AND MODERN SLAVERY POLICY

INTRODUCTION

Green Shield Group specialises in delivering carbon reduction strategies for businesses across the UK. Working across a multitude of sectors from manufacturing to local authorities, our offering simplifies that transition to sustainable solutions for our clients whilst demonstrating solid commercial gains.

SCOPE

Our Human Rights Policy applies to all Green Shield Group staff and Partners.

PRINCIPLES

We will:

- seek to avoid causing or contributing to adverse human rights impacts through our own activities and address such impacts, if they do occur, in a timely and appropriate manner;
- seek to prevent or mitigate adverse human rights impacts that are directly related to our operations, products and services through our business relationships;
- provide for, or cooperate in their remediation through legitimate processes, if we identify that we have caused or contributed to adverse human rights impacts;
- continue to look for ways to support the promotion of human rights within our operations and our sphere of influence.

POLICY

This sets out our position with respect to human rights and modern slavery and sits alongside our Employment Manual and Health and Safety Policy.

Our statements below draw upon the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work:

- i. Child Labour: Green Shield Group will not use child labour and will comply with all relevant laws in this regard. We do, however, support legitimate workplace apprenticeships, internships and other similar programmes that comply with the applicable laws and regulations.
- ii. Modern slavery: Green Shield Group will not use forced, bonded or involuntary labour, and workers are not required to lodge 'deposits' or identity papers with the firm and can leave after giving reasonable notice, with all wages owed to be paid. We have a zero-tolerance approach towards human trafficking.
- iii. Health, Safety and Hygiene: All Green Shield Group employees will work in an environment that is both safe and healthy, in line with our UK Health and Safety Policy.
- iv. Discipline: Green Shield Group prohibits physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation. Disciplinary and grievance procedures are clearly documented and communicated to all employees in our Employee Manual. All disciplinary measures of a serious nature are recorded and actioned.
- v. Freedom of Association and Employee Representation: Green Shield Group recognises that all its employees have the right to form and join organisations of their own choosing as long as this does not contravene the firm's External Appointments Guidance and Process policy, which ensures our independence, in line with the regulatory requirements of our business. The firm takes active measures to seek employees' views about the firm, respects employees' rights to belong to trade unions and fully complies with our legal obligations to inform and consult employees.
- vi. Working Hours: Green Shield Group will ensure that working hours are reasonable and comply with the law and industry standards.
- vii. Equality of Treatment: Green Shield Group is fully committed to eliminating discrimination in recruitment, training and working conditions, on grounds of race, colour, sex, age, religion, political opinion, national extraction, sexual orientation, disability or social origin and to promoting equality of opportunity and treatment as outlined in the Employment Manual.



- viii. Employment terms: Green Shield Group will provide written and clear contracts which detail the terms and conditions of its staff employment. We will ensure that work performed by employees is on the basis of recognised employment law and practice.
- ix. Remuneration: Green Shield Group will, at a minimum, provide wages and benefits that meet national standards. We will provide employees with clear written information on their pay and conditions. The firm prohibits deductions on employees' wages as a disciplinary measure. Green Shield Group is committed to equal pay and benefits for men and women for work of equal value.

GRIEVANCE AND REMEDIATION

- x. Where a human rights violation is identified, we'll work with all parties involved to seek access to remedy, compensation and justice for the victim. We'll also investigate the root cause so that we can take appropriate steps to prevent such a violation reoccurring.

IMPLEMENTATION

- xi. Jonathan Harrison, 'Managing Director', is responsible for the firm's Human Rights Policy. Our Human Rights Policy and our Modern Slavery Statement are accessible to our staff via the Employee Handbook.