

SECTION 1

POLICY STATEMENTS

- 1.1 Health and Safety Policy Statement**
- 1.2 Environmental Policy Statement**
- 1.3 Quality Policy Statement**
- 1.4 Equal Opportunities Policy Statement**
- 1.5 Drugs Policy Statement**
- 1.6 Alcohol Policy Statement**
- 1.7 Stress Policy Statement**
- 1.8 Smoke Free Policy**
- 1.9 Violence to Staff Policy**
- 1.10 Ethical Policy**
- 1.11 Fraud & Malpractice Policy**
- 1.12 Training Policy**
- 1.13 Modern Day Slavery Policy**
- 1.14 Bribery and Corruption Policy Statement**

1.1 HEALTH & SAFETY POLICY STATEMENT

Effective Health, Safety and Management control and work practice is an integral part of our company culture and is recognised as a key driver in respect to achieving success in our business objectives.

Key HS&E Policy Objectives

To ensure that our business operations are undertaken in accordance with best practice procedures which reflect compliance with current and up to date statutory safety, health and environmental legislation (including rail standards).

To provide our workforce with “best practice” training, information, procedures, skills, equipment and leadership to assist them in ensuring our business operations, at all times, reflect “best practice”.

To promote the “Respect for People” principles as highlighted within the Construction Taskforce industry improvement report “Rethinking Construction”.

To ensure the directors and senior management of Meads Construction Ltd recognise and fully support the requirement to establish improved H&S standards within the industry and are committed to supporting our clients in achieving this objective by ensuring excellent standards of H&S management and practice within our operational control.

To influence mutual performance improvement objectives and practices within the integrated supply chain which we recognise as being important to the success of our client’s projects and the industry in general.

To ensure our business operations do not cause risk to the health and safety of our employees or to others who may be affected by our business operations.

To ensure our business operations do not cause risk to the local or wider environment through poor environmental management control or work practices

To continually improve our H&S policy at regular intervals or at other times where events such as significant H&S incidents or the introduction of new or updated legislation dictates

Key Statutory Duties Compliance.

We shall do all that is reasonably practicable to implement our legal duties under all relevant statutory provisions and in particular those provisions outlined in:

- The Health & Safety At Work Act 1974;
- The Management of Health & Safety at Work Regulations 1999.
- The Construction (Design and Management) Regulations 2015

In particular as an employer we will:

Provide and maintain plant and systems of work that are safe and without risk to health

Ensure the safety and absence of risks to health in connection with the use, handling, storage and transportation of articles and substances.

Provide information, instruction, training and supervision as is necessary to ensure the health and safety at work of all employees.

Ensure the maintenance of workplaces under our control in a condition that is safe and without risks to health, which includes the provision and maintenance of safe access and egress routes

The provision and maintenance of a working environment that is safe, without risks to health and adequate as regards to facilities and the arrangements of the welfare of our employees whilst at work.

Employee Co-operation

As a condition of our employment we require our employees to co-operate with us to ensure we meet with our objectives. In particular we require our employees to:

Take reasonable care of your own health and safety and that of others who may be affected by your acts or omissions whilst at work.

Not intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety and welfare.

Directors Commitment

We, the directors, pledge to provide satisfactory resources to ensure, so far as reasonably practicable, that our company employees are provided with the necessary training, supervision, information, procedures, skills, equipment and leadership necessary to achieve our policy objectives.

This policy applies to all employees/agency workers and sub-contractors working for Meads Construction Ltd

Date: 21st January 2019



Signed:

Managing Director

Meads Construction Ltd

1.2 ENVIRONMENTAL POLICY STATEMENT

Meads Construction Limited undertake to:

Comply with all statutory and regulatory requirements.

Comply with our clients' environmental policy requirements and standards.

Identify and evaluate the environmental consequences of the Company's activities and to ensure pollution prevention measures have been implemented.

Promote and support 'best practice' for maximising environmental benefit, to encourage environmental improvement and minimise the potential for environmental damage that may be caused by our operations

Educate and train our employees to promote awareness and understanding of environmental issues.

Ensure that any sub-contractors demonstrate compliance with our environmental policy and that of our clients.

Minimise the total quantity of waste produced by our operations and maximise recycling of any waste produced

Where applicable, liaise closely with statutory and local authorities, clients, third party organisations and the general public.

Review our environmental performance and that of our sub-contractors by regular auditing of operations, identify and rectify any deficiencies and promote continuous development and improvement.

Establish and continually develop an effective Environmental Management System to complement our core business operations, supported by proven Environmental Consultants where necessary.

Meads Construction Limited in conjunction with the Project Management Team, will provide assistance to the Client in developing a culture of sustainability during the design and construction. This will be achieved by heightening awareness of sustainability issues through:

Look at Sustainability Requirements for all Trade Contractors (Packaging/Supply).

Setting of appropriate targets (KPIs) which will demonstrate good practice in terms of sustainability;

Provision of presentation material on sustainable issues, including a presentation for the initial site induction and ongoing tool-box talks;

Regular meetings to discuss sustainability issues and to report improvements in design, particularly additional sustainability measure;

Provide instruction to all trade contractors on project sustainability issues;

Review and assessment of trade contractor sustainability performance;

Assistance in setting a clear agenda for project sustainability;

The on-going training in current sustainability practices for the Project Team;

To advise the Project Management Team/Client on the on-going consideration of economic and social sustainability issues;

Workshops and meetings to be held to clarify any issues regarding waste management and allow feedback and decisions on sustainability improvements.

This policy applies to all employees/agency workers and sub-contractors working for Meads Construction Ltd

Date: 21st January 2019

A handwritten signature in black ink, appearing to read 'M. D. Jones', with a long horizontal flourish extending to the right.

Signed:

Managing Director

Meads Construction Ltd

1.3 QUALITY POLICY STATEMENT

Meads Construction Limited (the 'Organisation');

Aims to provide defect free goods and services to its clients on time and within budget. The Organisation operates a Quality Management System that is certificated to BS EN ISO 9001 certification, including aspects specific to the construction industry.

The management is committed to:

1. Developing and improving the Quality Management System.
2. Continually improve the effectiveness of the Quality Management System.
3. The enhancement of client satisfaction.

The management has a continuing commitment to:

1. Ensure that client needs and expectations are determined and fulfilled with the aim of achieving client satisfaction.
2. Communicate throughout the Organisation the importance of meeting the client needs and legal requirements.
3. Establish the Quality Policy and its objectives.
4. Conduct Monitoring and Management Reviews of the effectiveness of the implementation of the Quality Management System
5. Ensure the availability of resources.
6. Continually develop our quality management systems.

The structure of the Quality Management System is defined in this Quality Manual (SHEQ Manual). All personnel understand the requirements of this Quality Policy and abide with the contents of the Quality Manual. In addition to all English and EU commercial legislation and regulations, the Organisation complies with all legislation and regulations specifically related to its business activities. The Organisation constantly monitors its quality performance and implements improvements and continual development when appropriate.

This Quality Policy is regularly reviewed in order to ensure its continuing suitability.

This policy applies to all employees/agency workers and sub-contractors working for Meads Construction Ltd

Date: 21st January 2019



Signed:

Managing Director

Meads Construction Ltd

1.4 EQUAL OPPORTUNITIES POLICY STATEMENT

Meads Construction Ltd acknowledges the desirability of equal opportunities for employment and the observance of the codes of practice as far as it is reasonably practicable. Also we are fully aware and compliant with the recent changes introduced by The Equality Act 2010 which provides a new cross-cutting legislative framework to protect the rights of individuals and advance equality of opportunity for all; to update, simplify and strengthen the previous legislation; and to deliver a simple, modern and accessible framework of discrimination law which protects individuals from unfair treatment and promotes a fair and more equal society.

The provisions in the Equality Act will come into force at different times to allow time for the people and organisations affected by the new laws to prepare for them. The Government is considering how the different provisions will be commenced so that the Act is implemented in an effective and proportionate way.

We shall comply by;

- Providing protection for people discriminated against because they are perceived to have, or are associated with someone who has, a protected characteristic, so providing new protection for people like careers.
- Providing protection for breastfeeding mothers;
- Applying the detriment model to victimisation protection (aligning with the approach in employment law).
- Extending protection from 3rd party harassment to all protected characteristics.
- Making it more difficult for disabled people to be unfairly screened out when applying for jobs, by restricting the circumstances in which employers can ask job applicants questions about disability or health.
- Making pay secrecy clauses unenforceable.

The intention of the policy is to see that no job applicant or Employee receives less favourable treatment on the grounds of disability, sex, marital status, race, age, colour, nationality or ethnic or national origins, or is disadvantaged by unreasonable conditions or requirements.

Individuals should be selected, promoted and treated on the grounds of their performance, attitude and abilities. All suitably qualified Employees will be given equal opportunity to progress within the organisation. All those who come into direct or indirect contact with Employees or applicants for employment should ensure that they understand this policy and recognise the part they have to play in its fulfillment. It is the policy of the Company to encourage the employment and career development of disabled persons. No unnecessary limitations are placed on the type of work that they can perform.

Full and fair consideration will be given to disabled applicants for employment; existing Employees who become disabled will have the opportunity to re-train and continue in employment wherever possible.

This policy applies to all employees/agency workers and sub-contractors working for Meads Construction Ltd

Date: 21st January 2019



Signed:

Managing Director



Meads Construction Ltd

1.5 DRUGS POLICY STATEMENT

Illegal substances come in many forms, but in general all will alter the way in which people consuming them perceive the world around them. Ecstasy, for example, reportedly often freely available within many dance venues, makes people feel 'spaced out' and slightly dizzy, whilst heroin (which can be smoked, sniffed through the nose or injected) slows people down and makes them feel sleepy and detached from reality. Other drugs, such as LSD and magic mushrooms, cause those who take them to hallucinate. This means they see and hear things that do not exist, or see and hear things that do exist but in a totally different way.

Because of these effects, it is not hard to appreciate how those under the influence of illegal substances can be a danger both to themselves and to their colleagues. Whilst this danger might not be as great in an office environment as it would be, for instance, on a shop floor, the fact remains that the effect of the substance will alter the work contribution individuals will be able to make, and affect their performance within the work team.

***Note:** Meads Construction Ltd appreciates that many people who consume illegal substances would like to quit the habit yet may not be aware of the organisations to which they can turn for help, support and advice. Likewise, many others may be the family or friends of users who would equally welcome such assistance. It is therefore considered appropriate to give details of these organisations. All will treat your enquiry as confidential, and if they are not able to assist you directly will be able to refer you to someone who can.*

The National Drugs Helpline
(Operate a 24-hour helpline)
Telephone: 0800-776600

ADFAM National
(Monday–Friday, 10.00–17.00)
Telephone: 020-7928 8900

Families Anonymous
(Monday–Friday, 13.00–17.00)
Telephone: 020-7498 4680

From time to time all of us suffer ailments for which legally prescribed or legally available drugs are required, either to rectify the ailment itself or to relieve the symptoms suffered. Whilst in many cases the ailment will be temporary, in others it will be longer-term. Just as with illegal substances, however, the drugs we take legally will have some form of side effect. It is of importance that, where this side effect is likely to affect your performance in any way (for instance you are likely to feel drowsy), you are to notify Meads Construction Ltd of this fact and the details.

Our aim is to protect your safety and, in certain cases (in particular if you normally work with powered machinery), it may be necessary to move you to lower risky activities.

This policy applies to all employees/agency workers and sub-contractors working for Meads Construction Ltd

Date: 21st January 2019



Signed:

Managing Director

1.6 ALCOHOL POLICY STATEMENT

Guidelines on alcohol consumption compare drinks in terms of the number of units of alcohol they contain. For instance, a half pint of average-strength beer, a small glass of wine and a single spirit measure each contain one unit of alcohol.

When we drink, the units we consume get passed into our circulatory system. Here they mix with our blood and get pumped by our hearts to our brains, where they begin to take effect and alter the way we feel and behave.

The amount of alcohol in our bloodstream is measured in milligrams of alcohol per 100 millilitres of blood.

In an average-sized man, a unit of alcohol converts to approximately 20 milligrams per 100 millilitres, whilst in an average-sized woman, a unit results in a blood alcohol level of approximately 30 milligrams. The difference between men and women arises from the fact that women are generally smaller than men and their bodies, as a consequence, contain less fluid. When a unit of alcohol is consumed by a woman it therefore forms a greater concentration in her bloodstream than it would in the bloodstream of a man.

If you are a man of average build and you drink one and a half pints of average-strength beer, you will be consuming three units of alcohol. As alcohol gets absorbed quickly by your digestive system, the result will be that within a relatively short period you will have a blood alcohol level of some 60 milligrams per 100 millilitres.

Tests have shown that a person with a blood alcohol level of 60 milligrams has impaired judgment, is becoming reckless and should not be making important decisions.

Consume two pints (*a mere four units*) and your blood alcohol level will be 80 milligrams per 100 millilitres. At 80 milligrams tests have shown that the average person suffers from a marked loss of co-ordination.

If you are a woman of average build, a blood alcohol level of 60 milligrams per 100 millilitres is reached after consuming just a single pint of beer (*the equivalent of just two glasses of wine or two shorts*), whilst 80 milligrams is reached by consuming just one further single unit. With your judgment and co-ordination affected in this way, you are, for all intents and purposes, semi-detached from reality. Unfortunately, where plant, equipment and machinery are concerned, being semi-detached from reality could easily lead to serious accidents.

If having read this policy you believe you are consuming too much alcohol and want help in reducing your intake, the following organisations will be able to assist you. All calls will be treated as confidential.

The National Alcohol Helpline	0800-917 8282
Al-Anon Family Groups	020-7403 0888 (<i>for relatives and friends of alcoholics</i>)
Alcoholics Anonymous	01904-644026 (<i>Head Office</i>)

As an employer, it is our duty to promote and retain a safe working environment. After due consideration, we have decided that to permit people to work who have consumed alcohol is to put at risk not only the individual concerned, but his or her colleagues as well. As a consequence, we have determined that anyone found consuming alcohol whilst at work, or considered to be under the influence of alcohol during working hours, will be subject to disciplinary procedure.

This policy applies to all employees/agency workers and sub-contractors working for Meads Construction Ltd

Date: 21st January 2019



Signed:



Managing Director
Meads Construction Ltd

1.7 STRESS POLICY STATEMENT

Scope

Meads Construction Ltd is committed to protecting the health, safety and welfare of our employees. We recognise that workplace stress is a health and safety issue and acknowledge the importance of identifying and reducing workplace stress.

This policy will apply to everyone in the company. Managers and supervisors are responsible for implementation and monitoring of staff. The company is responsible for allocating the necessary resources to deal with stress at work issues.

Definition of stress

The Health and Safety Executive define stress as “the adverse reaction people have to excessive pressure or other types of demand placed on them”.

This makes an important distinction between pressure, which can be a positive state if managed correctly, and stress that can be detrimental to health.

Policy

- The company will identify all workplace stressors and conduct risk assessments to eliminate stress or control the risks from stress. These risk assessments will be regularly reviewed.
- The company will consult with Trade Union Safety Representatives (If Nominated) on all proposed action relating to the prevention of workplace stress.
- The company will provide training for all managers and supervisory staff in safe practices.
- The company will provide confidential counselling for staff affected by Stress, caused by either work or external factors (conducted by the Stress Manager)
- The company will provide adequate resources to enable managers to implement the company’s agreed stress management strategy.

Responsibilities:

Managers and Supervisors

- Conduct and implement recommendations of risks assessments within their jurisdiction.
- Ensure good communication between management and staff, particularly where there are organisational and procedural changes.
- Ensure staff are fully trained to discharge their duties.
- Ensure staff are provided with meaningful developmental opportunities.
- Monitor workloads to ensure that people are not overloaded.

- Monitor working hours and overtime to ensure that staff are not overworking. Monitor holidays to ensure that staff are taking their full entitlement.
- Attend training as requested in good management practice and health and safety.
- Ensure that bullying and harassment is not tolerated within their jurisdiction.
- Be vigilant and offer additional support to a member of staff who is experiencing stress outside work e.g. bereavement or separation.

This policy applies to all employees/agency workers and sub-contractors working for Meads Construction Ltd

Date: 21st January 2019



Signed:

Managing Director

Meads Construction Ltd

1.8 SMOKE-FREE POLICY

Scope

This policy has been developed to protect all employees and visitors from exposure to second-hand smoke. The company acknowledges that non-smokers have a right to work in a safe and healthy environment and that exposure to second-hand smoke increases the risk of lung cancer and heart disease and causes or triggers asthma as well as many other illnesses and minor conditions. All employees must refrain from smoking outside the times and circumstances set out in this policy. The policy applies to all staff, visitors, contractors, consultants, customers, clients and other persons who enter the premises of this workplace.

From 1st July 2007, smoking is prohibited in all places of public gathering including workplaces. It is the intention of the Company to comply fully with this requirement and therefore the conditions described below will come into effect from that date.

POLICY AIMS

This policy seeks to:

- Guarantee a healthy working environment and protect the health of employees and members of the public by ensuring that all company workplaces are smoke-free.
- Comply with: the Health and Safety at Work etc Act 1974, under which employers have a general duty to protect, so far as is reasonably practicable, the health, safety and welfare of their employees; and the [Health Act 2006 OR Smoking, Health and Social Care (Scotland) Act 2005], which prohibits smoking in enclosed workplaces and public places.
- Raise awareness of the dangers associated with exposure to tobacco smoke.
- Take account of the needs of those who choose to smoke and to support those who wish to stop.

RESTRICTIONS ON SMOKING

Smoking is prohibited at all times in all enclosed and substantially enclosed public or private areas in the workplace, including lifts, corridors, stairways, lavatories, rest rooms, reception areas or entrances. This applies to all persons, regardless of their status within the company or business with the company.

STAFF

Members of staff are only permitted to smoke whilst off duty (in official break times only) and in unenclosed designated areas.

VISITORS

All visitors, contractors, consultants, customers, clients and other persons who enter the premises of this workplace are required to abide by this smoke-free policy. All staff members are expected to make visitors aware of this policy and to ask any visitor who breaches this policy to extinguish all smoking materials. Visitors who continue to smoke should be reported to a manager.

COMPANY VEHICLES

Smoking is prohibited in vehicles belonging to or leased by the company and in staff private vehicles if ever used to transport members of staff or members of the public whilst carrying out their duties as an employee.

IMPLEMENTATION

Meads Management has overall responsibility for the implementation and review of this policy. However, all members of staff are obliged to adhere to and support the implementation of the policy on an ongoing basis. All existing employees and new personnel shall be informed of this policy and of the designated smoking areas.

'No-smoking' signs will be clearly displayed at the entrances to and within the premises, and in all smoke-free vehicles. Appropriate signs will be displayed in the designated areas where smoking is permitted.

NON-COMPLIANCE

Any member of staff who does not comply with this policy shall be liable to disciplinary action in accordance with the company's Disciplinary Procedure. Those who do not comply with the smoke-free law may also be liable to a fixed penalty fine and possible criminal prosecution.

HELP TO STOP SMOKING

The NHS offers a range of free services to help smokers give up. The NHS Smoking Helpline number is 0800 169 0 169 or visit www.gosmokefree.co.uk.

REVIEW

This policy will be kept under review so as to ensure that it continues to meet its aims.

This policy applies to all employees/agency workers and sub-contractors working for Meads Construction Ltd

Date: 21st January 2019



Signed:

Managing Director

Meads Construction Ltd

1.9 VIOLENCE AT WORK POLICY

Introduction

Meads Construction Ltd recognises its statutory duty to ensure that any aggression and violence as a potential risk to employees whilst at work is prevented. This procedure highlights the Company's systematic approach to ensure that so as far as possible, the procedures are adopted through the organisation.

It recognises that different staff groups might well be subject to different levels of risk which shall reflect additional advice or support such as providing means of communications i.e. mobile telephones.

Those at risk are staffs who regularly deal with members of the public who may be angry, distressed, disturbed, ill, embarrassed or resentful. The resulting feelings can be aggression and violence directed at our employees.

Violence from the public can be defined as "Any incident in which an employee is verbally abused, threatened or assaulted by a member of the public in circumstances arising out of the course of their employment".

Statement of Policy

Meads Construction Ltd acknowledges the risk of violence and aggression towards staff while at work and affirms that such violence, threat of violence and aggression or verbal abuse is wholly unacceptable. The Company will ensure that employees are provided with, in so far as reasonably practicable, a safe place and safe systems of work and that where employees are subjected to violence and aggression, they are provided with appropriate support.

It will be the responsibility of the Managing Director to ensure that all the procedures are brought to the attention all the employees

The Company will consider as unacceptable:

- i) Severe verbal abuse or threats to its employees.
- ii) Verbal or physical harassment of its employees including racial or sexual harassment.
- iii) Verbal or physical abuse to employees outside working hours, arising from employment with the Company.
- iv) Attacks on or damage to employee's property arising from or in connection with employees carrying out their duties.

The key areas that can have a substantial impact to the performance of this policy are:-

- i) The prevention of violence.
- ii) Dealing appropriately with acts of violence and aggression.
- iii) Monitoring and aftercare.

Preventing Violence and Aggression

The Company will implement procedures whereby the possibility of employees being harmed is reduced or removed.

Certain tasks and jobs may leave some employees more susceptible to violence and aggression than others. The personal safety of such employees will remain a prime management consideration when designing jobs and

allocating tasks. Personal alarms, mobile telephones or radios will be issued to those employees where risk assessments identify the need.

Interview rooms will, where considered appropriate, be equipped with panic buttons and screens to protect employees. Such needs will be balanced against customer care needs as in some cases a screen can be a barrier

to effective communication.

Training will be provided for employees who are considered to be in a potential risk situation, specific job training will include:

- i) An understanding of fear and aggression.
- ii) How to avoid/diffuse potentially violent situations.
- iii) What to do if threatened or attacked.
- iv) What support is available if threatened or attacked and how to obtain it.

Additional elements will be included for managers covering:

- a) An understanding of the impact of fear, violence and aggression on employees and their work performance.
- b) The necessity for managers to adopt a sympathetic and clear response so that employees are encouraged to report such issues.
- c) The need for managers regularly to review operational procedures.

Procedures In The Event Of Violent or Aggressive Acts

All abuse or violence to our employees must be reported to the Partners. The necessary first aid will be provided to the employee in the event of an injury. In the case of serious assault the incident shall be reported to the Police.

Support shall be given to any employee who is subject to violence or abuse, including any time off work required for interviews or attending court shall be deemed in Company time. Counseling will be provided where it is considered necessary.

Monitoring

The Company shall be responsible for monitoring all incidents of violence and aggression, this will be done via the reporting of all such incidents.

Records

Discreet recording systems will be in place where employees can be made aware of potential risks at certain addresses or particular individuals.

These records will not be kept on computer as this will constitute a breach of the Data Protection Act.

GUIDANCE FOR EMPLOYEES IN PREVENTING OR AVOIDING VIOLENCE AND AGGRESSION

External Visits;

Be on time for appointments.

Prepare for the visit, ensure you know, as far as possible the problems you might face. If you do not know the

answer to something say so, do not waffle or provide mis-information.

Before leaving the office ensure that you have complied with the guidance on external visits.

If you have been issued with a mobile phone ensure the battery is sufficiently charged before departing.

Check for any known details about who you are going to visit. If there is a known history from the files.

If you have a particular fear of dogs, ask your supervisor for a personal dog alarm.

On arrival at your location, park your car where possible in a well-lit area and facing the easiest exit route. Keep car keys separate from brief cases, handbags etc.

Check the signal strength on your mobile phone. You will then know if you can rely on them.

Always show your identification on arrival.

If the person you are supposed to see is not there, do not enter, ascertain if they will be there by a certain time and say you will return. Alternatively, leave a message for them to contact you at the office to re-arrange the appointment.

On entering any premises, try to note the exit route. Never underestimate the threat, trust your intuition and feelings. If you sense something is wrong, then there probably is. In which case withdraw from the situation, make an excuse, say you are unwell and use your phone or radio to inform your office. Such action should indicate to the office that you might be in a potential problem situation.

Once clear, inform the office that you have left.

If a general interview develops to an aggressive stage, do not respond in the same manner. Try to defuse the situation by staying calm, try to speak slowly and clearly. Meeting aggression with aggression will resolve nothing. Try to identify what the client actually wants, but remember, make no promises that you do not have the authority to make.

Avoid adopting an aggressive stance i.e. standing with arms folded, hands on hips, wagging a finger, waving arms, as they will only incite an already difficult situation.

Office Interviews

Check that an interview room is available. If the individual concerned has a known history of violence or you have reason to suspect a confrontational situation might arise, elect to use a secure interview room where there is separation from the client. Alternatively, use an interview room that has panic buttons but ensure someone is on hand to respond if needed.

If a secure room or one fitted with panic buttons is not available and you anticipate problems, ask your supervisor to provide a second person to attend the interview.

Always ensure someone knows that you are going to conduct an interview and where it is to be held.

Where possible check the interview room first, ensure that there are no loose items that could be used as weapons.

The interview room should be clean and tidy, not partially used as a storeroom.

If the room only has one door always show the client in first, so that you end up sitting nearest the door. You will then have the advantage if you need to withdraw in a hurry.

At the conclusion of any interview, whether internal or external, inform your Supervisor of any relevant details you consider might benefit yourself or colleagues in the future.

Cash Handling or Carrying

Employees who handle or carry cash as part of their duties should not put themselves or their colleagues at risk in defence of the money. If challenged in a robbery situation they should hand the money over as instructed and make no attempt to obstruct the perpetration of the act in any way.

Abusive Telephone Calls

Be patient, after a few moments the abusive language may abate.

If the customer does not calm down, advise them clearly that unless they are able to continue the discussion in a civil manner, the call will be terminated. If it is impossible to supply a satisfactory answer to the query, offer to pass the customer to a supervisor.

Do Not Panic

- Do not put the receiver down immediately.
- Do not become upset.
- Do not lose your temper.
- Do not be tempted to react with a similar response.
- Do not take remarks personally.

If after giving a warning, behavior does not improve then you may terminate the call.

All calls of this nature should be mentioned to your supervisor so that he or she is aware and the incident can be noted.

This policy applies to all employees/agency workers and sub-contractors working for Meads Construction Ltd

Date: 21st January 2019



Signed:

Managing Director

Meads Construction Ltd

1.10 ETHICAL POLICY STATEMENT

Our ethical policy has been established to set standards and provide guidelines regarding the way Meads Construction Ltd should operate in Ethical matters. It is important to retain this set of core values and approaches to the process of doing business on a daily basis.

The Ethical policy focuses around nine key areas as follows:

Employees

Meads Construction Ltd values its Employees as a key resource. An atmosphere of good employee communication, involvement & responsibility both individually & as a team is of central importance. The personal development and optimum use of Employee talent is encouraged.

Every employee has an equal opportunity for personal recognition and career development, regardless of personal background or belief. No form of discrimination or harassment will be tolerated. An important part of this policy is recruiting, selecting, rewarding and promoting people who demonstrate entrepreneurial behavior and show individual initiative in combination with a high degree of knowledge and experience of our products, markets and culture.

Customers

Everybody must play their part in providing quality and efficiency to customers. Meads Construction Ltd believes that integrity in dealings with customers is a prerequisite for a successful and sustained business relationship. Personal contact, helpful and responsive action are features of the service we provide to develop long term relations with our customers.

Suppliers

Meads Construction Ltd believes in supporting UK trade and therefore will only buy from preferred UK based manufacturing companies if possible. Meads Construction Ltd will aim to develop relationships with suppliers based on mutual trust and all dealings will be conducted in a professional manner at all times. We also undertake to pay our suppliers on time and according to agreed terms. All supplier relationships are assessed against our Quality standards.

Community

Meads Construction Ltd seek to comply with all legislation affecting its operations. We will seek to serve and support the community in which it operates by providing services efficiently and profitably, and by providing good employment opportunities and conditions. We will take into account the concerns of the wider community including both national and local interests. In particular, we will agree a chosen local charity each year and endeavor to raise money outside of business interests for this Charity.

The Environment

Meads Construction Ltd is concerned with the conservation of the environment in its broadest sense, and recognises that certain resources are finite and must be used responsibly. We will therefore: Work with others toward a consensus on environmental quality standards which are desirable and attainable. Aim to improve all aspects of the business in respect of environmental issues. Pay particular attention to environmental issues including the conservation of energy and natural resources, the control of noise levels, recycling of waste material and the utilisation of non-polluting technology.

This is reflected in our emphasis to supply recycled promotional products as an option wherever possible

Health & Safety

Meads Construction Ltd provides safe working conditions for all its Employees and will do all that is reasonable and practicable to:

- Protect the health and safety of its employees and minimise any adverse effects on the environment
- Implement working practices to prevent personal injury and damage to property
- Making all employees aware of risk assessments and raise awareness of their own responsibilities for the health and safety of themselves and others

Human Rights

Meads Construction Ltd is committed to the prevention of any violation of established Human Rights of any kind, particularly where child labour or undesirable forced acts are involved.

Social Responsibilities

Meads Construction Ltd is committed to and encourages collaboration with organisations that support Fair Trade and operate non-exploitative employment practices in their own businesses and supply chains throughout the world. It will conversely not invest in or do business with any organisation that:

- Manufactures or designs weapons, instruments of warfare or torture, or that derives significant revenue from weapons related products or services; or
- Manufactures tobacco products or derives significant revenue from tobacco related production.

Conflict of Interest

This policy does not allow bribery or political contributions and requires employees to seek to avoid conflicts of interest and to disclose any that do exist. Employees must ensure that their actions are not affected by conflicts of interests. This covers the receipt of giving of gifts or hospitality which is prohibited.

Information

Meads Construction Ltd regards information for the purpose of its business as a corporate asset which must be protected against loss of availability, infringement and improper disclosure. We seek to ensure as far as reasonably practicable, that this information is protected.

This applies also to intellectual property including inventions, trade secrets, technical information, product design, production expertise, customers' information etc.

Records

Honesty, completeness and accuracy of records are vital. Records of transactions should be maintained in an accurate, complete, transparent and timely manner in accordance with accounting principles. No unrecorded funds or assets should be established or maintained.

Meads Construction Ltd believes that implementation of this ethics policy:

- Sets clear standards for employees.
- Makes good business sense.
- Protects the integrity and enhances our reputation
- Supports the principles of good corporate governance.

This policy applies to all employees/agency workers and sub-contractors working for Meads Construction Ltd

Date: 21st January 2019



Signed:

1.11 FRAUD & MALPRACTICE POLICY STATEMENT

Scope

- Meads Construction Ltd has a commitment to high legal, ethical and moral standards. All members of staff are expected to share this commitment.
- We already have procedures in place that reduce the likelihood of fraud occurring. These include documented procedures and systems of internal control and risk assessment management. In addition we ensure that a risk (and fraud) awareness culture exists within our organisation.
- This document is intended to provide direction and help to those Staff and Directors who find themselves having to deal with suspected cases of theft, fraud or corruption.

Policy

- This policy applies to any irregularity, or suspected irregularity, involving employees as well as consultants, vendors, contractors, and/or any other parties with a business relationship with this organisation.
- Fraud & malpractice comprises both the use of deception to obtain an unjust or illegal financial advantage and intentional misrepresentations affecting any aspect of our company activity by one or more individuals among management, staff or third parties.
- All Managers and staff have a duty to familiarise themselves with the types of improprieties that might be expected to occur within their areas of responsibility and to be alert for any indications or irregularity.
- Meads Construction Ltd is absolutely committed to maintaining an honest, open and well-intentioned atmosphere within the organisation. It is therefore also committed to the elimination of any fraud and/or malpractice.
- Meads Construction Ltd wishes to encourage anyone having reasonable suspicions of fraud or malpractice to report them. Therefore it is also our policy, which will be rigorously enforced, that no employee will suffer in any way as a result of reporting reasonably held suspicions.
- All members of staff can therefore be confident that they will not suffer in any way as a result of reporting reasonably held suspicions of fraud or malpractice. For these purposes reasonably held 'suspicions' shall mean any suspicions other than those, which are raised maliciously and found to be groundless. The organisation will deal with all occurrences in accordance with the Public Interest Disclosure Act.

This policy applies to all employees/agency workers and sub-contractors working for Meads Construction Ltd

Date: 21st January 2019



Signed:

Managing Director

Meads Construction Ltd

1.12 TRAINING POLICY STATEMENT

General statement

We are committed to ensuring that all our staff has received adequate training in order to be able to carry out their duties safely and without risk to themselves or others. We aim to achieve this by providing induction training for all new employees and ongoing skills training. The need for training will be determined by the requirements of the individual employee's job role. We also constantly assess and review the development needs of our employees and actively encourage all staff, regardless of employment status, language skills and grade, to take advantage of all training opportunities available and to communicate their individual needs and requirements.

Legal position

Providing adequate training to our staff is a requirement of the Health and Safety at Work Act 1974. It is also required by other more specific legislation which relates to the use of machinery, handling activities, hazardous substances and the wearing of personal protective equipment. The test of adequacy is based on providing sufficient training to ensure that employees can carry out their duties without jeopardising either their health and safety, or that of their colleagues and visitors.

Procedures

The following procedures describe the steps that we will take to comply with our obligations to provide adequate training:

- All new employees will receive induction training. This training includes Health and Safety, Quality and Environmental management and covers key areas such as fire safety, first aid and any workplace hazards. A signature will be required from the employee to confirm that they have understood the contents.
- This training will also be provided to other groups who will be working on our projects. This includes agency temps, work experience students and sub-contractors
- Some training is a statutory requirement, e.g. for manual handling activities. However, where this is not the case, a Senior Manager/HR will determine whether any training is necessary in order to carry out the job role safely.
- Where an employee's job involves the operation of tools or machinery, on-the-job training will be provided by the Site or dedicated training provider. It is the responsibility of the employee's manager to ensure that this is carried out with close liaisons with the Health and Safety Manager. This training will also be given if an employee changes jobs
- If new machinery or equipment is purchased, further training is likely to become necessary.

4. Effectiveness

The effectiveness of our training policy is measured by checking: -

- Quality of work
- Customer Feedback
- Contract Retention

5. Employee duties

Employees are expected to cooperate with us fully with regard to attending health and safety training courses. We expect that all reasonable effort will be made to attend a course, but if this isn't possible, that we will be notified well in advance. Should an employee fail to attend a course which is a legal requirement without good reason, we retain the right to treat it as a disciplinary matter.

This policy applies to all employees/agency workers and sub-contractors working for Meads Construction Ltd

Date: 21st January 2019



Signed:

Managing Director, Meads Construction Ltd

1.13 MODERN DAY SLAVERY ACT 2015 POLICY STATEMENT

Meads Construction recognises that slavery and human trafficking remains a hidden blight on our global society. We aim to identify our responsibly by alerting staff to the risks, however small, in our business and in the wider supply chain. Staff are expected and encouraged to report concerns to management.

We are committed to ensuring that there is no modern day slavery or human trafficking in our supply chain or in any part of our business. This Policy reflects our commitment to acting ethically and with integrity in all our business activities and to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place within our own business and the activities of our supply chain.

This Policy takes into account, and supports, the policies, procedures and requirements documented in our existing management systems, compliant with the requirements of ISO 9001, ISO 14001 and OHSAS 18001.

Our aim is to ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities.

We will achieve this aim by our commitment to identify and mitigate risk in the following ways (but not limited to):

- More stringent vetting and investigation of our supply chain (contractors, sub-contractors, policies, contracts etc.)
- Continually audit & review our practices for checking all employees are paid at least the minimum wage and have the right to work.
- We will encourage the reporting of concerns and the protection of whistle blowers.
- We will not knowingly support or deal with any business involved in slavery or human trafficking.
- We have zero tolerance to slavery and human trafficking.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will provide training to relevant members of staff as required.

This policy is in accordance with section 54 of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement.

This policy applies to all employees/agency workers and sub-contractors working for Meads Construction Ltd

Date: 21st January 2019



Signed:

Managing Director

Meads Construction Ltd

1.15 BRIBERY AND CORRUPTION POLICY

It is MEADS Policy to conduct business in an honest way and without the use of corrupt practices or acts of bribery to obtain an unfair advantage. The Company does not, directly or indirectly, offer, solicit, accept or receive any gift, payment or any other advantage from any person or organization in return for providing any improper business or other advantage.

Corruption can be defined as the abuse of public or private office for personal gain. It is important to note that corruption occurs even when there has not actually been a benefit but an expectation of one.

Bribery is a form of corruption. It can be defined as giving, promising, offering, requesting, agreeing to receive or the acceptance of any gift, fee or other reward, to or from any person (in government or business), as an incentive to do something that is dishonest, illegal, improper or a breach of trust.

Bribery can occur both actively and passively. Active bribery is when a person may seek to corrupt another by giving or attempting to make a bribe. Passive bribery is when a person may act corruptly by seeking, agreeing to accept, or by accepting a bribe.

Under UK law (UK Bribery Act 2010), bribery and corruption is punishable for individuals by up to 10 years imprisonment. If the Company is found to have taken part in the corruption or lacks adequate procedures to prevent bribery, it could face an unlimited fine, be excluded from tendering for Government Project and face untold damage to its reputation.

This policy is fully supported by the Board of Directors and is to be communicated to everyone in our business to ensure their commitment to it. The Board attaches the utmost importance to this policy and will apply a zero tolerance approach to acts of bribery and corruption by any of our employees or third party representatives. Any breach of this policy will be regarded as a serious matter by the Company and is likely to result in disciplinary action.

This policy applies to individual employees, consultants, agents, sub-contractors or any other people or bodies associated with MEADS or any of its subsidiaries and employees.

Understanding Specific Areas of Risk

While high profile cases of bribery, involving large sums of cash and senior executives are most likely to hit the headlines, bribery can be a risk in many areas of our industry:

- a. kickbacks and reciprocal agreements;
- b. false claims;
- c. Preferential treatment;

- d. corrupt third parties (including agents, consultants, contractors or sub-contractors);
- e. excessive gifts and hospitality;
- f. inadequate financial controls or record keeping;

Kickbacks and reciprocal agreements or any other form of 'quid pro quo' are never acceptable. We will not participate in any form of collusion. We will never accept improper payments to obtain new business, retain existing business, or secure any improper advantage.

Corrupt third parties can include a range of people acting on our behalf such as agents, consultants, contractors or sub-contractors. We wish to work only with those who are committed to our standards and will undertake due diligence to ensure this. We will engage a third party only when there is a clear business rationale for doing so and with an appropriate contract. We will ensure all payments made to third parties are properly authorized and recorded.

Excessive gifts and hospitality can be used to exert improper influence on decision makers. We will only accept gifts and hospitality in accordance with this policy. We will ensure any gifts or hospitality we offer are reasonable in terms of value and frequency. We will never offer or accept gifts or hospitality if we feel it could influence a business decision or give the appearance of doing so.

Inadequate financial controls or record keeping can be exploited to hide bribes or corrupt practices. We will ensure we have robust controls in place so that our financial and other records are accurate and complete and never misleading.

Gifts and Hospitality

The Company appreciates that giving and receiving gifts or hospitality can help build goodwill in business relationships but they are only appropriate in limited circumstances.

In no circumstances should any employee offer, give or accept any gift or hospitality regardless of value, which might be construed as influencing a business decision.

You should consider the following points when you are faced with an opportunity to give or receive gifts or hospitality:

- a. What is your intention when offering a gift or hospitality or what do you think is the intention of the business partner when offering the same to you?
- b. Is the intention to build a business relationship or to influence a business decision such as the award of a tendered contract?
- c. Is the nature of the gift or hospitality modest or could it make you (as the recipient) feel under an obligation to give something back?
- d. Are you happy to justify giving or receiving the gift or hospitality? If it doesn't feel right, it probably isn't.

You must **always** seek prior approval from your Line Manager before offering or accepting any gift or hospitality.

Risk Areas

There are some kinds of gifts or hospitality which should never be considered as acceptable. **We have assessed that the following areas are of risk and as such**, you should not give, offer, receive or approve any:

- a. Gifts or hospitality involving third parties involved in any competitive bid or tender process that you are – or may considered to be – involved in;
- b. Receiving cash payments for preferential treatment;

- c. Payments of cash (or cash equivalents) or paying someone else's personal bills or expenses;
- d. Any hospitality that may be considered indecent or inappropriate as part of a business relationship or which may have a negative effect on the Company's reputation; and
- e. Gifts or hospitality that you are not prepared to report or seek approval for internally irrespective of whether you use personal or company hospitality.

Record Keeping

No undisclosed or unrecorded account, fund or asset shall be established or maintained by any person or organisation. Full and proper records shall be kept of all transactions involving the Company. Supporting documents shall be readily available, genuine and shall accurately describe the nature of any transactions undertaken.

Conflict of Interest

You are required to avoid any contact that might lead to, or suggest, a conflict of interest between your personal activities and the business of the Company or its Clients or Suppliers. All employees are required to disclose family links or other close relationships with a relevant decision maker in a client, supplier or competitor organisation;

How to Raise a Concern

If you have a concern or know of or suspect a violation of this policy we want you to speak up immediately. Please don't ignore it. Speaking up can be a difficult thing to do, so be reassured that all information received will be treated seriously and investigated appropriately.

If you act in good faith, believing your information is accurate, we will protect you even if you are wrong. Doing the right thing will not disadvantage your career or adversely affect your relationships at work. And that is why we will not tolerate any form of discrimination or bullying of someone who has spoken up in good faith. Some concerns can be addressed by speaking to the person whose conduct is a cause for concern. We understand that this is not always possible so we suggest that you speak to your supervisor or line manager. If, for whatever reason, you don't feel comfortable doing this, you can contact any member of the Human Resources.

This policy applies to all employees/agency workers and sub-contractors working for Meads Construction Ltd

Date: 21st January 2019



Signed:

Managing Director



Meads Construction Ltd