



QUIKTEC HOLDINGS LIMITED



Quikfix
International
Limited



Quikbild
International
Limited

Corporate Policies[®]



Introduction

These corporate policies have been approved by the Board of Quiktec Holdings Limited [QHL] and apply to Quiktec Holdings Limited, Quikfix International Limited, Quikbild International Limited and all subsidiary businesses.

Our corporate policies reflect our values and the resulting management and delivery system within which our decisions are made and implemented. Their intent is to express clear direction on the things that are fundamental, basic, most important and therefore most enduring in our business.

Quiktec is an international company headquartered in the United Kingdom. These policies conform to UK legislation. Where the laws of a country in which Quiktec operates require a policy to be amended it is for the subsidiary company to effect such amendments maintaining as much as possible of the original policy and intent.

Enquiries about any of these policies should be referred to your line manager, territorial Managing Director or any Corporate Director.

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Conduct and Ethics

Ethical Principles

Quiktec (QHL) is committed to principles of business ethics and lawful conduct.

It is our policy to conduct ourselves ethically and lawfully in all matters and to maintain high standards of business integrity.

Employees must at all times comply with QHL business conduct and related guidelines (see *Standards of Business Conduct Required from Employees, page 28*)

Violation of any QHL guideline is cause for disciplinary action, including dismissal from the company. Employees should consult their management immediately if they have any questions whether their actions could violate a QHL guideline.

Furthermore, it is our practice to voluntarily and promptly disclose known violations of government procurement laws to appropriate officials of government. In the event that QHL benefitted economically from such known violations it is our practice to reimburse the government customer accordingly. QHL employees should immediately make known to appropriate levels of management any and all allegations of violations in connection with any government contract.

QHL Corporate Directors are responsible for providing specific instructions regarding business conduct and ethics and directing periodic reviews. The Board of Management of each subsidiary is responsible for implementing such instructions and monitoring local compliance.

QHL provides guidance to subsidiary companies on matters of Social Responsibility and ways by which Quikfix can assist and support the communities in which it operates. Acting within those guidelines, companies may allocate budgets, employee time, equipment and resources to deliver Social Responsibility Programmes they consider appropriate.

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Data Privacy

In Confidence

QHL is committed to protecting the privacy and confidentiality of personal, business and commercially-sensitive information.

Uniform practices for collecting, using, disclosing, storing, accessing, transferring or otherwise processing information about employees, customers, suppliers and others, assist QHL to manage data fairly and appropriately, disclosing and disseminating it only under proper and controlled circumstances.

Our general principles in this respect are as follows:

- QHL will collect and process information fairly and lawfully;
- QHL will collect only information that is relevant to and necessary for a particular purpose(s) and process such information in a manner that is not incompatible with the purpose(s) for which it is collected;
- QHL will keep information as accurate, complete and up-to-date as is necessary for which it is processed;
- QHL will make information available inside or outside the business only in appropriate, relevant and necessary circumstances;
- QHL will implement appropriate technical and organisational measures to safeguard information and protect its privacy, confidentiality and non-disclosure to unauthorised third parties;
- QHL will provide individuals with appropriate access to personal information about them.

QHL issues guidelines and instructions to subsidiary companies about the security of information and data for which they have direct responsibility.

QHL documents and files are classified as follows:

- P** Public domain
- I** Internal Only
- R** Restricted Access (Specified)
- S** Secured/Confidential/Non-Disclosure

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Employment Standards

Peak Performance

At QHL we always set high standards for the way we conduct business—in areas from contract delivery to corporate and social responsibility, including compliance with all applicable laws and regulations. Such conduct is demonstrated by QHL employees and we engage people who readily embrace our principles and practices and perform to the highest possible standards.

Those principles mean:

- QHL will not use forced or involuntary labour of any type;
- QHL will not use child labour. The term “child” refers to any employed person under the age of 16 years, or under the age for completing compulsory education, or under the minimum age for employment in the country whichever is the greatest. We support the use of legitimate workplace apprenticeship, internships and other similar programmes that comply with all laws and regulations applicable to such programmes;
- QHL will, at a minimum, comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime hours, piece rates and other elements of compensation, and provide legally mandated benefits;
- QHL will not exceed maximum hours of work prescribed by law and will appropriately compensate overtime. Employees will not be required to work more than 60 hours per week, including overtime, except in extraordinary business circumstances with their consent or where the nature of the position requires such work, as for employees in executive, managerial or professional positions. In countries where the maximum working week is shorter, that standard shall apply. Employees should be allowed at least one day off per seven-day week;
- QHL will not discriminate in hiring, promotion, compensation of employees and employment practices and will strive to create a work environment free of discrimination on grounds of race, colour, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity or expression, marital status, pregnancy, political affiliation or disability;
- QHL will treat all employees with respect and dignity and will not use corporal punishment, threats of violence or other forms of physical coercion or harassment;
- QHL will provide its employees with a safe and healthy workplace in compliance with all applicable laws and regulations or, in their absence, best industry practice. Consistent with this undertaking, QHL will have and will implement effective programmes for employees that encompass things such as life safety, incident investigation, materials and equipment-handling safety, use of company vehicles, etc.
- QHL will respect the legal rights of its employees to join or to refrain from joining worker organisations, including labour organisations, trade unions or professional associations. QHL believes that the interests of QHL and its employees are best served through a favourable, collaborative work environment with direct communication between employees and management. QHL endeavours to establish such favourable employment conditions, to promote positive relationships between employees and managers, to facilitate employee communications and to support employee development;
- QHL is committed to environmental protection. In addition to complying with applicable environmental laws and regulations, every employee must comply with our environmental policy and the corporate directives and requirements that support that policy. Employees are expected to report any environmental concern or violation of environmental law or QHL policy to their managers. Managers are required to take prompt action;
- QHL will comply with all applicable laws, regulations and other legal requirements in all locations where it conducts business;
- QHL requires its employees to conduct business and carry out their duties in accordance with the highest ethical standards. Quikfix strictly complies with all laws and regulations on bribery, corruption and prohibited business practices;

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Employment Standards

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- QHL makes available to all employees open communication channels for suggestions and complaints to management. QHL maintains confidential channels for direct contact with the QIL and QBL Boards for employee complaints, serious concerns and any form of harassment;
- QHL will perform business audits to ensure adherence to our policies, practices and procedures. We will keep whatever records are necessary in accordance with local laws and regulations;
- QHL is committed to protecting the privacy and confidentiality of personal, business and commercially-sensitive information and has a policy and procedures in place to ensure its security;
- QHL encourages its subsidiary companies to undertake a variety of social responsibility programmes by making budgets and resources available for local initiatives.

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Environment

Conserve, Preserve

QHL is committed to environmental protection and conservation and adopts the following corporate policy objectives wherever and whenever practical:

- Provide a safe and healthy workplace and ensure that personnel are properly trained and have appropriate safety and emergency equipment;
- Be an environmentally-responsible neighbour in the communities where we operate and act promptly and responsibly to correct incidents or conditions that endanger health, safety or the environment. Report them to authorities promptly and inform affected parties as appropriate;
- Conserve natural resources by reusing and recycling materials, purchasing recycled materials and using recyclable packaging and other materials;
- Develop, manufacture and market products that are safe for their intended use, efficient in their use of energy, protective of the environment and that can be reused, recycled or disposed of safely;
- Use development and manufacturing processes that do not adversely affect the environment, including developing and improving operations and technologies to minimise waste; prevent air, water and other pollution; minimise health and safety risks; and dispose of waste safely and responsibly;
- Ensure the responsible use of energy throughout our business, including conserving energy, improving energy efficiency and giving preference to renewable over non-renewable energy sources where feasible;
- Participate in efforts to improve environmental protection and understanding in the territories in which we operate and share appropriate pollution prevention technology, knowledge and methods;
- Utilise QHL products, services and expertise to assist in the development of solutions to environmental problems;
- Meet or exceed all applicable government requirements and voluntary requirements to which QHL subscribes. Set and adhere to stringent requirements of our own no matter where we do business;
- Strive to continually improve our environmental management system and performance and periodically issue progress reports to the general public;
- Conduct rigorous audits and self-assessments of our compliance with this policy, measure progress of our environmental affairs performance and report periodically to both the local Board and QHL Board.

Every employee and every contractor on QHL premises is expected to adopt this policy and to report any environmental, health or safety concern to QHL management. Managers are required to take prompt action.

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Equality and Diversity

Fairness & Respect

QHL is committed to eliminating unlawful discrimination and to promoting equality and diversity within our policies, practices and procedures.

We are also committed to promoting equality and diversity throughout the business wherever it operates. This applies to our professional dealings with customers, employees, sub-contractors and third parties.

We shall treat everyone equally and with the same attention, courtesy and respect regardless of:

- sex (including marital status, gender reassignment, pregnancy, maternity and paternity);
- sexual orientation (including civil partnership status);
- race or racial group (including colour, nationality and ethnic or national origins);
- religion or belief;
- age;
- caring responsibility; or
- disability.

QHL recognises the benefits of having a diverse workforce and will take steps to ensure that:

- we endeavour to recruit from the widest pool of qualified candidates practicable;
- employment opportunities are open and accessible to all on the basis of their individual qualities and personal merit;
- where appropriate, positive action measures are taken to attract applications from all sections of society and especially from those groups which are under-represented in the workforce;
- selection criteria and processes do not unlawfully discriminate on the grounds of sex, sexual orientation, religion or belief, age or disability; other than in those instances where Quikfix is exercising permitted positive action or a permitted exemption or to do so would be in contravention with the laws of a particular country or jurisdiction in which it operates;
- wherever appropriate and necessary, lawful exemptions (genuine occupational requirements) will be used to recruit suitable staff to meet the special needs of particular groups;
- all recruitment agencies acting for the business are aware of requirements not to discriminate and to act accordingly;
- wherever practicable every effort will be made to provide suitable equipment, facilities and services to enable employees to fulfil their job function.

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Health and Safety

Work Safe

QHL strives for excellence in employee wellbeing and product safety.

The importance we place in these efforts demonstrates our commitment to employees, customers and business partners.

Corporate strategies, instructions and procedures must support our commitment to employee wellbeing and product safety. Each and every one of us alike shares a personal responsibility for the following objectives:

- Provide a safe and healthy workplace;
- Provide products that are safe for use by our employees, customers and end-users;
- Meet applicable legal requirements and voluntary practices to which we subscribe where we operate and sell products;
- Incorporate employee wellbeing and product safety requirements in business strategies, plans, reviews and product offerings;
- Implement, measure and continually strive to improve wellbeing processes for preventing work-related accidents, injuries and illnesses.
- Foster employee involvement and provide appropriate wellbeing education to employees to enhance their ability to work safely and productively;
- Perform audits and self-assessments of our conformance with employee wellbeing and product safety requirements with results reported to senior management and both the territorial and corporate Boards.
- Investigate and address work-related and product safety incidents;
- Provide appropriate resources to fulfil these objectives.

Detailed work practices are contained within Quikfix/Quikbild Standard Operating Procedures and Material & Equipment Handling Instructions.

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Politics

It's Personal

It is our belief that we participate in politics as private citizens.

Therefore, it is our policy *not* to make contributions of resources such as money, goods, services or time to political candidates or parties. This policy applies equally in all countries where QHL does business, regardless of whether or not such contributions are considered legal in any host country.

We encourage QHL employees to participate in political activity in their individual communities and countries in their own time. The company will do everything reasonable to accommodate employees who need to be away from work while running for or holding political office, or fulfilling significant party duties during a campaign or election. QHL will not pay employees for time off for political activity. However, if a country where QHL does business has a law that requires an employer to give time off with pay to any employee holding public office then that law takes precedence.

Because QHL does business with many levels of government, we have procedures and guidelines designed to avoid conflict of interest for employees holding government offices which must be followed.

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Procurement

Fair Dealing

Wherever QHL operates, we strive to conduct our business in a fair, open and equitable manner.

Consistent with this objective we follow local laws and customs of the countries in which we operate and we actively seek to establish close working relationships with businesses indigenous to those countries.

It is QHL policy neither to buy nor sell on a reciprocity basis. To maintain the high standards of our products and services we must base all our purchasing decisions on quality, price and the supplier's reliability. To use reciprocity as a purchasing consideration would limit our field of supply and could jeopardize our product quality and price. In addition, we should never use our purchases to aid our selling efforts. We must leave customers free to buy unhindered by any reciprocity considerations.

Procurement is always to be conducted in an ethical and honest manner, preferably by open tender or invitation to quote on the basis of a common specification issued publicly or to at least three suppliers where the requirement is of a specialist nature. The only exception is in respect of licensed and nominated-supplier goods and services.

Small items of mainly consumable items may be purchased "over-the-counter" for which a Receipt is required, but more expensive goods and services or those required reasonably regularly are procured via our tender/quotation process. This process applies to single-item purchases and those required frequently throughout the year.

QHL provides subsidiary companies with details of the procurement process and also sets "authorisation limits" for managers, the general manager and the local Board. Some purchases require the prior approval of QHL. Capital items require to be included in the Inventory.

Where goods or services are procured for cash, from friends or relatives or their businesses, outside the procurement process, at other than for the lowest tender or quotation price, not in accordance with our other policies, or on unfavourable or unreasonable terms and conditions, a Justification Report is required by the local Board of Management and QIL or QBL.

Employees are not permitted to favour particular suppliers in any way and the offer or acceptance of inducements may result in the supplier being removed from any further consideration and the employee being disciplined and possibly dismissed from the company. The accounting officer is responsible for ensuring the procurement process and payments system are properly implemented.

Procurement procedures are detailed in the Company's Financial Regulations.

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Quality Management

Simply the Best

QHL has an over-riding commitment to the quality of its products and services we provide to our customers. Quality is recognised as a fundamental component of the value customers receive from us.

QHL is committed to the goals of achieving *exemplary* customer satisfaction; delivering superior products and services; and exceeding customer expectations.

We have developed a Quality Management System supported by Standard Operating Procedures which encourage consistent high performance by employees in all our business activities.

All employees are expected to contribute to continual improvement as an integral part of our Quality Management System and their own job satisfaction.

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Bribery and Corruption

Honest and Ethical

This anti-bribery and anti-corruption policy exists to set out the responsibilities of QHL and all representatives, agents, employees, officers, directors, its subsidiaries and affiliates in regards to observing and upholding the company's zero-tolerance position on bribery and corruption. It also exists to act as a source of information and guidance for those working for QHL, intending to help in recognising and dealing with such matters and understanding their responsibilities.

QHL is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing procedures that ensure bribery is prevented. QHL has zero-tolerance for bribery and corrupt activities. The company is committed to acting professionally, fairly and with integrity in all business dealings wherever it operates. QHL will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which it operates and binds itself by the laws of the UK, including the Bribery Act 2010, in regards to its conduct both at home and abroad.

This policy applies to all employees (whether temporary, fixed-term or permanent), consultants, contractors, trainees, seconded personnel, representatives, agents, directors, shareholders, third parties, and any other person or persons associated with the company or any of its subsidiaries.

In the context of this policy, third-party refers to any individual or organisation with which QHL works. It refers to actual, potential and prospective clients, customers, suppliers, distributors, business contacts, agents, advisors and government and public bodies including their advisors, representatives and officials, politicians and public parties.

Arrangements made by QHL with a third party are subject to clear contractual terms and conditions, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting or soliciting something of value or of an advantage so to induce or influence an action or decision. A bribe refers to any inducement, reward or object/item of value offered to another individual in order to gain commercial, contractual, regulatory or personal advantage. Bribery is not limited to the act of offering a bribe but also to receiving or accepting one.

QHL accepts normal and appropriate gestures of hospitality and goodwill (whether give to or received from third parties) provided they meet the following conditions: (a) the gift is not made with the intention of influencing the party to whom it is being given, nor to obtain or reward the retention of a business or a business advantage, nor as an explicit or implicit exchange for favours or benefits; (b) is not made with the suggestion that a return favour is expected; (c) is in compliance with local law; (d) is given in the name of the company and not the individual's; (e) does not include cash or a cash equivalent; (f) is appropriate for and commensurate with the circumstances; (g) is of an appropriate type and value and given at an appropriate time taking into account the reason for the gift; (h) is given/received openly not secretly; and (i) complies with QHL directives in relation to gifts, their value and the selectivity of recipients.

QHL recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures and religions and so requires that all gifts given or received are recorded by the territorial general manager and details copied to the QHL Director of Corporate Services.

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Bribery and Corruption

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Exceptional facilitation payments, commissions, “tips” and fees which may be justified and properly incurred must be (a) legal; (b) kept to a minimum; (c) receipted; (d) recorded; (e) pre-approved by a Director; and (f) not run contrary to this policy under any circumstances.

Guidance on the acceptable payment of facilitation fees, commission and tips is made available by the QHL Director of Corporate Services

QHL does not make donations of any kind or by any means to support any political party or candidate (*see Politics Policy*).

QHL accepts and encourages the act of donating to legitimate charities as set out in the company’s Social Responsibility directives and Community Fund guidelines.

All employees are equally responsible for the prevention, detection and reporting of any act of bribery and corruption. They are required to avoid any activities that could lead to or imply a breach of this policy.

All suspected or actual breaches should be reported immediately to the territorial Managing Director and/or QHL Director of Corporate Services.

It is the duty of the territorial Board of Management to monitor the effectiveness of this policy and review its implementation on a regular basis. The results of such monitoring and reviews are to be submitted to the QHL Director of Corporate Services who shall inform the QIL/QBL Board of Directors which shall take any remedial action considered necessary.

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Anti-Slavery & Human Trafficking

Introduction

Quiktec Holdings Limited is the parent company of both Quikfix International Limited and Quikbild International Limited with operations in Africa, Asia, Europe and the Americas. Quiktec Holdings Limited and all its subsidiaries value human rights and are committed to ensuring that all business is conducted according to ethical, professional and legal standards in a fair, honest and open manner. It is vital for us to maintain this reputation as it generates confidence in our business.

The Modern Slavery Act 2015 is an Act of Parliament of the United Kingdom and applies to all Quiktec operations wherever they are undertaken.

Modern slavery is a crime and violation of fundamental human rights. It takes various forms, such as:

- slavery, servitude (coercing someone to provide services) and forced and compulsory labour;
- human trafficking (arranging or facilitating the travel or movement of a victim with a view to them being exploited);
- committing any offence with the intention to commit human trafficking;
- aiding, abetting, counselling or procuring any of the above offences;

all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. The Company has a commitment to conduct its business and all its relationships based on integrity.

Policy

This Anti-Slavery and Human Trafficking Policy applies to all directors, officers and employees of Quiktec Holdings Limited and its subsidiaries. This Policy should be read in conjunction with the Company's other policies which serve as guides to how personnel are required to conduct themselves.

The Company has a zero tolerance approach to all forms of modern slavery and human trafficking within its business and within its supply chain and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place in its own business, in any subsidiary or in any of its supply chains.

The Board of each of the companies making up the Company have overall responsibility for ensuring this Policy complies with our legal and ethical obligations and that all those under our control comply with it. Management at all levels are responsible for ensuring those reporting to them understand and comply with this Policy and are given appropriate training on it and the issue of modern slavery and human trafficking in supply chains.

Personnel are invited to comment on this Policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to your territorial Managing Director or the Corporate Services Director.

The Board of each of the companies making up the Company are committed to the Policy and each is required to have measures in place designed to prevent and detect modern slavery and human trafficking within their business and their supply chain. The Company's programme in this regard contains the following elements:

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Anti-Slavery & Human Trafficking

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1. A policy which articulates the Company's commitment to prevent violations of the Modern Slavery Act 2015 within its operations and supply chain, being this Policy;
2. Communication of this Policy and all relevant elements of the programme to all employees throughout the Company and to our business partners and supply chain;
3. The assessment of modern slavery and human trafficking risks within the Company and its supply chain and the development of effective, efficient and transparent controls to reduce exposure to those risks;
4. The adoption of anti-slavery wording in contracts;
5. The adoption of appropriate due diligence on business partners, agents, contractors, consultants, sub-contractors and suppliers coupled with a requirement that they implement procedures which incorporate the principles of the Modern Slavery Act 2015; and
6. Training of all relevant individuals throughout the Company so that compliance with its policies and procedures is the duty of all relevant employees at all levels and so that individuals can recognise modern slavery practices and take steps to avoid the same.

The Company is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery and human trafficking throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act. In addition to the above, the Company provides safe and fair working conditions for all its employees and ensures that no child labour is employed, in line with minimum age laws, within the countries that it operates. The Company expects the same standards from all of its contractors, suppliers and other business partners and as part of its contracting processes, include specific prohibitions against the use of forced, compulsory or trafficked labour or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same standards. Pursuant to section 54 of the Modern Slavery Act 2015, the Board of each company making up the Company commits to publishing a public statement annually, setting out the steps it has taken during that particular financial year to ensure slavery and human trafficking is not taking place in any of its supply chains or within its own business.

Compliance with this Policy

Anyone working on the Company's behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives and suppliers must read, understand and comply with this Policy.

The prevention, detection and reporting of modern slavery in any part of the Company's businesses and supply chains is the responsibility of all those working for it or under its control. Those working on the Company's behalf are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

Employees must notify their territorial Managing Director or a Corporate Director as soon as possible if it is believed or suspected that a conflict with this Policy has occurred or may occur in the future. Employees are encouraged to raise concerns about any modern slavery likely in any parts of the Company's supply chains in any supplier tier at the earliest possible stage.

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Anti-Slavery & Human Trafficking

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Reporting

Internal reporting is critical to the Company's success and it is both expected and valued. Employees are required to be proactive and promptly report any suspected violations of the Policy or any illegal or unethical behaviour that they become aware of. Complaints will be kept confidential and will be dealt with appropriately. Employees will not experience retribution or retaliation for a complaint made in good faith.

If an employee believes that a breach of this Policy has occurred or is likely to occur, they must notify their territorial Managing Director and the Company's Corporate Services Director as soon as possible. If the employee is unsure about whether a particular act, the treatment of workers constitutes any of the various forms of modern slavery, it should be raised with their territorial Managing Director and the Company's Corporate Services Director.

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of its business or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If any employee believes that they have suffered any such treatment they should inform the Company's Corporate Services Director or Executive Chairman immediately.

Communication and Awareness of this Policy

Training on this Policy and on the risk our business faces from modern slavery in its supply chains will be provided to all new employees and updated to all employees as necessary.

Our zero tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this Policy

Any employee who breaches this Policy by engaging in or conspires to engage in any modern slavery conduct or human trafficking will face disciplinary action. This could, in the most severe circumstances, include immediate dismissal for misconduct or gross misconduct and if warranted legal proceedings may be brought.

The Company may terminate its relationship with other individuals and organisations working on its behalf or engaged by it if they breach this policy. In such cases, the Company may report the individual or organisation to the authorities as being in breach and possibly in contravention of the Act.

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Internet Use & Social Media

Introduction

Quiktec Holdings Limited and its subsidiary companies makes internet access available to its employees where relevant and useful for their jobs.

This internet use and social media policy describes the rules governing internet use at the company. It also sets out how personnel are expected to behave when using the internet.

This policy should be read alongside other key policies. The company's data protection and email policies are particularly relevant to staff who use the internet.

Why this policy exists

The internet is a powerful tool that brings significant benefits to Quiktec as an international business.

However, it is important every person at the company who uses the internet understands how to use it responsibly, safely and legally.

This policy:

- Reduces the online security risks the company faces;
- Lets staff know what they can and cannot do online;
- Ensures employees do not view inappropriate content at work; and
- Helps the company satisfy its legal obligations regarding internet use.

Policy scope

This policy applies to all staff, contractors and volunteers at Quiktec Holdings Limited and its subsidiary companies who use the company's internet on work time.

It applies no matter whether that internet access takes place on company premises, while travelling for business or while working from home.

It applies to use of the internet on any device that is owned by the company, or that is connected to any company network or systems. For example, it applies both to an employee using the internet at their desk and to employees who connect their own tablets or smart phones to the company wireless network.

Policy review and update

This policy will be reviewed periodically with any updates agreed by the QHL Corporate Board of Directors and advised to all employees.

INTERNET USE

Internet use is encouraged

QHL recognises that the internet is an integral part of doing business. It therefore encourages its employees to use the internet whenever such use supports the company's goals and objectives.

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Internet Use & Social Media

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For instance, employees may use the internet to:

- Purchase office supplies;
- Book business travel;
- Perform competitor or market research; and
- Identify potential suppliers or customers.

There are many valid reasons for using the internet at work and the company certainly allows its employees to explore and take advantage of the internet's many advantages.

Personal internet use

The company also recognises that the internet is embedded in many people's daily lives. As such, it allows employees to use the internet for personal reasons, with the following stipulations:

- Personal internet use should be of a reasonable level and restricted to non-work times, such as breaks and during lunch;
- All rules described in this policy apply equally to personal internet use. For instance, inappropriate content is always inappropriate, no matter whether it is being accessed for business or personal reasons; and
- Personal internet use must not affect the internet service available to other people in the company. For instance, downloading large files could slow access to other employees.

Authorised users

Only people who have been authorised to use the internet at the company may do so.

Authorisation is usually provided by the Corporate Services Directorate or territorial managing director. It is typically granted when a new employee joins the company and is assigned their login details for the company's IT systems.

Unauthorised use of the company's internet connection is prohibited.

Employees who use the internet without authorisation—or who provide access to unauthorised people—may be subject to disciplinary action.

Internet security

Used unwisely, the internet can be a source of security problems that do significant damage to the company's data and reputation.

- Users must not knowingly introduce any form of computer virus, Trojan, spyware or other malware into the company. Externally-provided memory sticks, discs and portable information storage devices must be checked before use by the Corporate Services Directorate;
- Employees must not gain access to websites or systems for which they do not have authorisation, either within the business or outside it, nor download information which is insecure, unencrypted or from an untrusted source;

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Internet Use & Social Media

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- Company data should only be uploaded to and shared via approved services. The Corporate Services Directorate can advise on appropriate tools for sending and sharing large amounts of data;
- Employees must not steal, use or disclose someone else's login or password without authorisation.

Employees must always consider the security of the company's systems and data when using the internet. If required, help and guidance is available from the Corporate Services Directorate.

Inappropriate content and uses

There are many sources of inappropriate content and materials available online. It is important for employees to understand that viewing or distributing inappropriate content is not acceptable under any circumstances.

Users must not:

- Take part in any activities on the internet that could bring the company into disrepute;
- Create or transmit material that might be defamatory or incur liability for the company;
- View, download, create or distribute any inappropriate content or material. Inappropriate content includes pornography, racial or religious slurs, gender-specific comments, information encouraging criminal skills or terrorism, or materials relating to cults, gambling and illegal drugs. This definition of inappropriate content or material also covers any text, images or other media that could reasonably offend someone on the basis of race, age, sex, religious or political beliefs, national origin, disability, sexual orientation, or any other characteristic protected by law;
- Use of the internet for any illegal or criminal activities;
- Send offensive or harassing material to others;
- Broadcast unsolicited personal views on social, political, religious or other non-business related matters;
- Send or post messages or material that could damage the company's image or reputation.

Copyright

Quikfix Holdings Limited respects and operates within copyright laws. Users may not use the internet to:

- Publish or share any copyrighted software, media or materials owned by third parties, unless permitted by that third party;
- Download illegal copies of music, films, games or other software, whether via file sharing services or other technologies.

Employees must not use the company's equipment, software or internet connection to perform any tasks which may involve breach of copyright law.

Monitoring internet use

Company IT and internet resources—including computers, smart phones and internet connections—are provided for legitimate business use.

Continued ...



Internet Use & Social Media

... *Continued*

The company therefore reserves the right to monitor use of the internet, to examine systems and review the data stored in those systems.

Any such examinations or monitoring will only be carried out by authorised employees.

Additionally, all internet data written, sent or received through the company's computer systems is part of official QHL records. The company can be legally compelled to show that information to law enforcement agencies or other parties.

Users should always ensure that the business information sent over or uploaded to the internet is accurate, appropriate, ethical and legal.

Potential sanctions

Knowingly breaching this policy is a serious matter. Users who do so will be subject to disciplinary action, up to and including termination of employment.

Employees, contractors and other users may also be held personally liable for violating this policy.

Where appropriate, the company will involve the police or other law enforcement agencies in relation to breaches

SOCIAL MEDIA

Purpose of policy

This policy is intended to help employees of Quikfix Holdings Limited and its subsidiary companies make appropriate decisions about the use of social media such as Twitter, Facebook, Google+ and LinkedIn. Other social media includes but is not exclusive to blogs, video, picture blogging and audio.

This policy outlines the standards QHL requires employees to observe when using social media, the circumstances in which QHL will monitor your use of social media and the action that will be taken in respect of breaches of this policy. The principles of this policy apply to use of social media regardless of the method used to access it—it covers static and mobile IT/computer equipment, as well as work and/or personal smart phones, etc.

Who is covered by the policy

This policy covers all individuals working at all levels and grades, including directors, senior executives, managers, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term employees, casual and agency staff and volunteers.

Why use social media

Social media enables the company to attract and inform new customers, recruit for missions or events or to seek feedback on services and products.

Continued ...



Internet Use & Social Media

... *Continued*

Responsibility for implementation of the policy

The Director of Corporate Services has overall responsibility for the effective operation of this policy.

All employees are responsible for their own compliance with this policy and for ensuring that it is consistently applied. All staff should ensure that they take the time to read and understand it. Any breach of this policy should be reported to the Director of Corporate Services.

Questions regarding the content or application of this policy should be directed to the Head of Resources or Marketing & Public Affairs, Corporate Services Directorate.

Using work-related social media

Only the Resources Unit of the Corporate Services Directorate is permitted to post material on a social media website in the company's name and behalf. Anyone who breaches this restriction will face the company's disciplinary procedure.

Approved social media websites for QHL and its subsidiaries are available from the Head of Marketing & Public Affairs.

Before using work-related social media you must:

- Have read and understood this policy and other relevant policies and directives;
- Have sought and gained prior written approval to do so from the Head of Marketing & Public Affairs.

The roles and functions which will be needed moving forward have been identified as follows, for example:

- Tweeting corporate news;
- Advertising promotions on Facebook;
- Advertising vacancies on LinkedIn or similar sites.

Personal use of social media

Personal use of social media in the workplace is permitted subject to certain conditions as detailed below. This privilege must not be abused or overused and the company reserves the right to withdraw permission at any time.

The following conditions must be met for personal use to continue:

- Use must be minimal and take place substantially outside of normal working hours, for example, breaks and lunch periods;
- Use must not interfere with business or office commitments;
- Use must comply with company policies and directives.

You are personally responsible for what you communicate on social media sites outside the workplace, for example, at home, in your own time, using your own equipment. You must always be mindful of your contributions and what you disclose about the company. For guidance see "General rules" below.

Continued ...



Internet Use & Social Media

... Continued

General rules for social media use

Whenever you are permitted to use social media in accordance with this policy, you must adhere to the following general rules. The same rules would also apply when using social media outside of work:

- Do not post or forward a link to any abusive, discriminatory, harassing, derogatory, defamatory or inappropriate content;
- An employee who feels that they have been harassed or bullied, or are offended by material posted by a colleague on to a social media website should inform the Head of resources;
- Never disclose commercially sensitive, anti-competitive, private or confidential information. If you are unsure whether the information you wish to share falls within one of these categories, you should discuss this with your line manager or the Director of Corporate Services;
- Do not post material in breach of copyright or other intellectual property rights;
- Be honest and open, but be mindful of the impact your contribution might make to people's perceptions of the company and the need not to bring the company in to disrepute;
- You are personally responsible for content you publish—be aware that it will be public for many years.
- When using social media for personal use, apply a disclaimer, for example: "*The views expressed are my own and not necessarily those of my employer*". Be aware though that even if you make it clear that your views on such topics do not represent those of the organisation, your comments could still damage the company's reputation;
- You should avoid social media communications that might be misconstrued in a way that could damage our business reputation, even indirectly;
- Do not post anything that your colleagues or our customers, clients, business partners, suppliers or vendors would find offensive, insulting, obscene and/or discriminatory. Bear in mind we operate internationally in markets where religious beliefs, cultures, business practices and opinions may be different to your own;
- If you have disclosed your affiliation as an employee of our organisation you must ensure that your profile and any content you post are consistent with the professional image you present to customers and colleagues.

Monitoring of social media

Employees should be aware that any use of social media websites (whether or not accessed for work purposes) may be monitored and, where breaches of this policy are found, action may be taken under the company's Disciplinary Procedure.

The company reserves the right to restrict or prevent access to certain social media websites if personal use is considered to be excessive. Monitoring is only carried out to the extent permitted or as required by law and as necessary and justifiable for legitimate business purposes.

Misuse of social media websites can, in certain circumstances, constitute a criminal offence or otherwise give rise to legal liability against you and the company.

If you notice any use of social media by other employees in breach of this policy please report it to your line manager or Head of Resources.

Continued ...



Internet Use & Social Media

... *Continued*

Where it is believed that an employee has failed to comply with this policy, they will face the company's disciplinary procedure. If the employee is found to have breached the policy, they will face a disciplinary penalty ranging from a verbal warning to dismissal.

The penalty applied will depend on factors such as the seriousness of the breach; the nature of the posting; the impact it has had on the organisation or the individual concerned; whether the comments cause problems given the employee's role; whether the employer can be identified by the posting(s); other mitigating factors such as the employee's disciplinary record, etc. Remember, the same test of reasonableness applies when dismissing for improper use of social media as it would for any other misconduct.

Agreement

All company employees, contractors and temporary staff are required to sign this agreement confirming their understanding and acceptance of this policy.

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Company Vehicles & Procedures

Ownership

All vehicles supplied by the company remain the property of Quiktec Holdings Limited or the leasing company and are to be used only in accordance with this policy.

Assigned Vehicles

Employees eligible for assignment of a company vehicle are selected at the discretion of the QHL Director of Corporate Services. Prior to assignment, eligible employees must prove that they possess a valid driving licence and appropriate insurance. Assigned vehicles may display corporate livery.

Operational Vehicles

General purpose and specialist operational vehicles may be driven only by qualified employees in possession of relevant training certification, a valid driving licence and appropriate insurance and having approval of a member of the territorial executive or management team.

Own Vehicles

An employee may use his or her own vehicles on company business provided they possess a valid driving licence, appropriate insurance and have the prior approval of a member of the territorial executive or management team. In such cases, a retrospective Mileage Claim Form may be completed and an allowance paid in accordance with territorial expenses procedure.

Hire Vehicles

Where a member of the territorial management team approves the hiring of a vehicle for short-term company use, authorising a specific and competent employee as the driver, terms and conditions of the vehicle hirer must be complied with.

Withdrawal of Company Vehicle Privilege

The privilege of driving a company vehicle may be withdrawn at any time for the following reasons:

- Abuse or misuse of the vehicle or failure to comply with the rules and procedures stipulated in this policy;
- A driving record which becomes deficient during the course of operating a company vehicle which, under certain circumstances, may be grounds for disciplinary action;
- Conviction or a guilty plea to driving a vehicle under the influence of alcohol or an illegal controlled substance;
- If an eligible driver has a long-term disability or absence from work, his/her assigned vehicle may be re-assigned to another employee. Upon recovery from the disability and/or absence and return to work, the driver may be assigned the original or another vehicle;
- Suspension, termination or resignation from office.

Driver Responsibilities

Eligible drivers are responsible for driving their vehicle in a safe, courteous and professional manner at all times. Employees must know and abide by all driving laws in all areas where they use the vehicle. Additionally, employees must maintain a current, valid driving licence and appropriate insurance which may be verified by appropriate personnel. If for any reason an employee's driving licence or insurance is revoked, suspended or restricted it is mandatory that corporate services/territorial administration manager is notified immediately.

Continued ...



Company Vehicles & Procedures

... Continued

Safety Guidelines

It is mandatory that seat belts be used by all occupants of a company vehicle at all times without exception. It is the driver's responsibility to ensure that all occupants fasten their seat belts prior to operating the vehicle. Any malfunctioning seat belt should be reported for repair by the employee immediately. QHL requires all employees to drive carefully and courteously, to obey all traffic laws and prohibits employees from driving under the influence of drugs and alcohol, including prescription drugs where they may impair ability or judgement. Company vehicles must not be used to transport flammable items, firearms or other hazardous items unless an exemption has been authorised by corporate services or a member of the territorial executive team. Drivers are responsible for ensuring the safe use of their vehicle by passengers and other employees.

Traffic Violations and Accidents

Excessive speeding violations and/or accident history may make a driver ineligible to receive or use a company-provided vehicle. Any employee who receives, for any reason, a summons or fine for a traffic or parking violation must pay it personally as soon as possible. All such summons, fines and violations must be reported immediately to corporate services or the territorial administration manager. Similarly, if the vehicle is involved in an accident, however slight, a full report must be notified immediately to corporate services or the territorial administration manager in addition to the appropriate authorities and insurance provider. Serious and repetitive traffic violations and/or accidents involving company vehicles may subject the driver to disciplinary action.

Personal Use of a Company Vehicle

Company vehicles are primarily intended and priority must be given for company use. Hire vehicles are not for personal use. Operational vehicles may be used to transport the driver and company employees to and from work and may be kept securely overnight or during weekends at the driver's residence (where it is not practicable to garage the vehicle at company premises) with permission of a member of the territorial executive or management team but must not be used for personal, social or domestic purposes. Assigned vehicles may be used for personal purposes subject to terms and conditions applicable to the eligible employee and notified from time to time. No one other than a designated driver is permitted to drive or operate a company vehicle. All vehicles, other than assigned vehicles, are not permitted to carry non-company employees nor to be used for carrying or doing anything other than in respect of the tasks pertaining to the employee's job and responsibilities. The acceptance of any form of compensation for carrying passengers or material is a disciplinary offence and may lead to dismissal. Smoking is not allowed in company vehicles.

Vehicle Maintenance

Every driver of a company vehicle is required to maintain the vehicle in a safe, clean operating condition. Maintenance schedules specified in the vehicle's Owner Manual should be adhered to and services together with repair work recorded and kept. Drivers are personally responsible for ensuring vehicles are adequately supplied with fuel, oil, water and that tyre pressures and battery levels are maintained properly. Repairs, maintenance and services must only be undertaken by the company's approved service providers. Corporate services or the territorial administration manager will arrange to pay and provide any taxes and registration requirements for company vehicles although the driver will be responsible for paying and maintaining necessary insurance. Fuel cards, where provided, must be used for the purchase of fuel and oil but otherwise receipts in respect of operational and hire vehicles must be obtained and submitted to the territorial administration manager for reimbursement.

Continued ...



Company Vehicles & Procedures

... Continued

Driving Outside the Territory

A company vehicle must not be driven outside the territory (or UK) for any reason without the prior permission of a member of the executive team.

Attachments

Only vehicles fitted with a towbar are permitted to pull company trailers or any other vehicles or equipment and only of the approved weight. Company vehicles must not tow non-company trailers, vehicles or equipment other than in an emergency. Vehicles are not permitted to display or have affixed to any part of them stickers, decals, signs or promotional material other than corporate livery and items having been approved by an executive team member. Only approved equipment may be attached, added, fitted, installed, carried or towed to a company vehicle.

Garaging

The company driver is responsible for ensuring all necessary precautions are taken to prevent damage and theft of the company vehicle and/or its contents at all times. Operational vehicles should be secured and garaged on company property when not in use or kept safely at the driver's residence on those occasions when it is more practicable to do so.

Odometers

Vehicle odometers and other installed equipment must not be removed, tampered with, changed, disconnected or made non-functional.

Insurance

Unless arranged otherwise, authorised drivers must ensure they pay and possess appropriate insurance for the type(s) of vehicle(s) they are approved to drive.

Company Responsibilities

QHL Corporate or the territorial company will provide and maintain the most suitable vehicles for the work expected from them.

Operational and assigned vehicles will be:

- Taxed;
- Insured;
- Serviced, maintained and repaired; and
- Expensed (unless notified otherwise) in respect of cleaning, fuelling, oiling and tyres.

Questions ?

Any questions relating to this policy should be referred to a member of the territorial executive or management team or to QHL Corporate Services.

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Standards of Employee Conduct

Introduction

Quiktec Holdings Limited expects its employees (including temporary, agency, interim, contractor or consultant staff) to be scrupulously impartial and honest in all affairs relating to the Company and their job within it. All employees also bear a responsibility to act as ambassadors for the Company in terms of their general conduct both within and outside the organisation. This policy outlines the responsibilities of employees working for the Company.

The duties of an employee are embodied in UK Common Law and built on by Statute. In those countries where such legislation does not exist employees are required to comply with UK Common Law and this policy.

Under Common Law the duties of an employee are as follows:

- to be ready and willing to work;
- to offer their services personally: for example they must not subcontract the work for which they are employed;
- to take reasonable care in the exercise of that service, including the duty to be competent at work and to take care of the Company's property;
- to not wilfully disrupt the Company's business;
- to obey reasonable orders as to the time, place, nature and method of service;
- to work only for the Company in the Company's time;
- to disclose information to the Company relevant to the Company's business: for example that they might know or discover;
- to hold solely for the Company the benefit of any invention relevant to the business on which the Company is engaged;
- to respect the Company's trade secrets;
- In general, to be of good faith and do nothing to destroy the trust and confidence necessary for employment;
- to account for all benefits—monetary or in kind—received in the course of employment;
- to not give or receive bribes or otherwise act corruptly;
- to indemnify the employer for loss caused by the employee.

United Kingdom Statute places further responsibilities on individual employees in regard to their own behaviour and their behaviour towards other employees.

Standard of Conduct Required by the Company

Bribery and Other Corrupt Behaviour

Quiktec Holdings Limited has a strict anti-bribery and corruption policy (see page 13) in line with the Bribery Act 2010 with which all employees are required to comply.

Transaction of Private Business

Employees having official dealings with contractors and other suppliers of goods or services must avoid transacting any kind of private business with them by any means other than the Company's normal commercial channels. No personal favours or transactions should be sought or accepted.

Visits to Conferences, Demonstrations, etc.

The Company intends that when it is necessary for employees to visit conferences, demonstrations and similar occasions, it should bear the travelling and subsistence expenses itself unless otherwise approved by a senior manager.

Continued ...



Standards of Employee Conduct

... *Continued*

Attendance at Luncheons, Receptions, etc.

Where it is evident that the work of the Company will be facilitated, invitations to attend receptions, luncheons, etc. may be accepted under the following rules:

- no employee may accept an invitation without first obtaining the approval of their line manager;
- in exceptional circumstances, where it is not possible to seek prior approval, the facts should be reported immediately afterwards;
- if addressed personally, such an invitation may not be transferred to another employee, except with the consent and approval of a senior manager as above and with the concurrence of the party issuing the invitation;
- invitations involving attendance outside normal working hours may be accepted only on the authority of the line manager;
- as a general rule, any employee who has doubts about the wisdom of accepting any hospitality should decline the offer.

NB. The important difference between, for example, attendance in an official capacity at a function organised by the Company and the acceptance of hospitality from a private individual or firm should be recognised.

Identification (see Dress Code Policy page 44)

Employees who have been issued with identity badges, safety wear or uniform should wear or carry these whilst carrying out their duties.

Confidentiality (see Data Privacy Policy page 4)

At all times confidentiality must be maintained. No information can be released to unauthorised persons or organisations—If doubt exists as to the validity of an organisation or individuals to receive information, this must be checked with the territorial Managing Director, Head of Marketing & Public Affairs or Corporate Services Director.

Personal Relationships

If a personal relationship between two employees develops within the working environment, the onus is on the senior employee concerned to bring this to the attention of the territorial Managing Director or Head of Resources as appropriate to confirm that there is no conflict of interest, nor will a conflict of interest arise. The Company reserves the right to move one of the employees concerned if it deems it necessary to do so.

Outside Interests and Employment

Outside interests include directorships, ownership, part ownership or material shareholdings in companies, business or consultancies like to seek to do business with the Company. These should be declared to the territorial Managing Director or Director of Corporate Services as appropriate as should the interests of a spouse/partner or close relative.

Political and Civic Activities (see Politics Policy page 10)

It is not the intention of the Company, or this policy, to dissuade employees from participating actively in public duties. It is important, however, that by doing so there is no suggestion to a third party that the employee is acting on behalf of, or with the support of, the Company. To avoid any misunderstanding, no Company employee should permit his or her company affiliation to be noted in any outside organisation's materials or activities without the express written approval of the territorial Managing Director or Corporate Services Director as appropriate.

Continued ...



Standards of Employee Conduct

... *Continued*

General Conduct

Employees should at all times conduct themselves in such a way as to enhance the reputation of the Company.

The Company will support employees who become aware of and are willing to report breaches of this policy or who genuinely believe that a breach is occurring, has occurred or is likely to occur within the business. Employees should raise the issue internally with their supervisor or line manager or in accordance with the Company's Policy on Disclosing Information in the Public Interest ("Whistleblowing") see page 41 .

These standards of conduct are intended to underpin and clarify standards required by the Company of its employees and form a fundamental part of the employment contract. Employees who fail to comply with the guidance detailed in this policy could be subject, following full investigation, to disciplinary action up to and including dismissal. If through their actions or omissions employees are found to be in contravention of either this policy or, indeed, their legal responsibilities then the Company reserves the right to take legal action if it deems it to be necessary to do so.

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Harassment and Bullying

Policy

The Company recognises that all employees have a right to work in an environment in which the dignity of individuals is respected and which is free from harassment and bullying. It is committed to eliminating intimidation in any form.

The policy applies to harassment on the grounds of disability, gender, marital status, sexual orientation, age, creed, colour, race, religion or ethnic origin.

Harassment breaches Company policy as outlined and it is classified as a serious offence which may result in disciplinary action including summary dismissal under the Disciplinary Procedure.

The policy applies to all employees of the Company and its subsidiaries.

Harassment is generally described as “*unwanted conduct which affects the dignity of women or men at work; it encompasses unwelcome physical, verbal or non-verbal behaviour which denigrates or ridicules or is intimidatory*”. The essential characteristic of harassment is that the action(s) is unwanted by the recipient.

The following interpretations and examples may be helpful in determining whether harassment has taken place.

General Harassment

Harassment can take many forms and may be directed in particular against women and ethnic minorities or towards people because of their age, disability, gender/gender reassignment, marriage/civil partnership, pregnancy/maternity, race, religion or belief, sex or sexual orientation. It may involve action, behaviour, comment or physical contact which is found objectionable or which causes offence; it can result in the recipient feeling threatened, humiliated or patronised and it can create an intimidating work environment.

Sexual Harassment

Sexual harassment can be defined as an uninvited, unreciprocated and unwelcome behaviour of a sexual nature which is offensive to the person involved and causes that person to feel threatened, humiliated or embarrassed. Examples of sexual harassment are:

- requests for sexual favours, including implied or overt promises of preferential treatment or threats concerning present or future employment status;
- offensive gestures or comments;
- sexually-orientated jibes, innuendo or jokes;
- unwanted physical contact;
- the display of sexually offensive visual material such as calendars, photographs, books or videos.

Sexual harassment may be experienced by men or women as a result of the conduct of men or women. It applies equally regardless of grade or level of job and may also occur when dealing with external clients and/or members of the public.

Racial or Sectarian Harassment

In the workplace, racial or sectarian harassment may take the form of actual or threatened physical abuse or it may involve offensive jokes, verbal abuse, language, graffiti or literature of a racist or sectarian nature or offensive remarks about a person's skin colour, physical characteristics or religion.

Continued ...



Harassment and Bullying

... *Continued*

It may also include repeated exclusion of a person from an ethnic or religious minority from conversations, patronising remarks, unfair allocation of work or pressure about the speed and/or quality of their work in a way which differs from the treatment of other employees.

Bullying

Bullying is the intimidation or belittling of someone through the misuse of power or position which leaves the recipient feeling hurt, upset, vulnerable or helpless. It is often inextricably linked to the areas of harassment described above. The following are examples of bullying:

- unjustified criticism of an individual's personal or professional performance, shouting at an individual, criticising an individual in front of others;
- spreading malicious rumours or making malicious allegations;
- intimidation or ridicule of individuals with disabilities and/or learning difficulties;
- ignoring or excluding an individual from the team/group.

Responsibilities of Management

Every supervisor and manager has an obligation to prevent harassment/bullying and to take immediate action once it has been identified, whether or not a complaint has been made.

Allegations of harassment or bullying, received either informally or formally, must be dealt with promptly and sensitively.

It is important that managers recognise that sexual harassment is any sexual advance unwanted by the recipient or behaviour which causes offence to the recipient. Similarly, racial harassment is behaviour which is racially offensive to the recipient. Managers must therefore take care to ensure that they do not pre-judge situations based on their own sexual or racial attitudes and perceptions.

It may not always be appropriate for a line manager to be involved with specific complaints. For example, if the complainant is male and wishes to speak to a male, but the manager is female or if the complaint relates to the conduct of the line manager.

Where complaints cannot be resolved informally between the complainant and the harasser (involving an appropriate manager if necessary) then the Company's formal Grievance Procedure will be invoked. Where there is evidence that harassment has occurred, prompt and corrective action will be taken, including disciplinary action where appropriate. Harassment is a serious offence which may result in summary dismissal.

Responsibilities of All Employees

Every employee has a personal responsibility NOT to harass or bully other employees.

An employee who becomes aware of harassment or bullying occurring should bring the matter to the attention of his/her line manager.

An employee who feels that he/she has been harassed or bullied has a right to seek redress by raising the matter informally with the harasser and/or line manager or by invoking the Company's formal Grievance Procedure.

Continued ...



Harassment and Bullying

... Continued

Communication

All employees will be informed of this policy and given re-assurance regarding:

- fear that others will consider the behaviour trivial and not take complaints or harassment seriously;
- fear that no action will be taken against a person guilty of harassment;
- fear of retaliation or victimisation in registering a complaint either informally or formally through the Grievance Procedure.

This policy will be part of employee induction.

Training will be provided for those employees who have specific responsibility for implementing this policy or who may be involved in dealing with complaints which arise.

Monitoring and Review

In order to assess the effectiveness of this policy, statistics will be maintained in respect of the complaints of harassment. Strict confidentiality will be maintained and the monitoring process will comply with the Data Protection Act.

The effectiveness of this policy will be reviewed regularly by the Company's Executive Committee.

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Drug and Alcohol

Policy

The Company recognises that alcohol and drug abuse related problems are an area of health and social concern. The Company also recognises that alcohol and drug abuse problems can have a detrimental effect on work performance and behaviour.

The Company will ensure that all its employees work within the laws of the land which, in the UK, are clear. These shall form the basis of Company policy in all territories:

- it is an offence to be unfit to drive, attempt to drive or be in charge of a motor vehicle, machinery or equipment when under the influence of drugs or alcohol;
- the possession, supply or production of controlled drugs is prohibited except for in special circumstances (eg. when they have been prescribed by a doctor);
- employees are required to take reasonable care of themselves and to behave in a way that does not pose risks to the health and safety of themselves or others in the workplace. This includes consideration of the effects that intoxication through taking alcohol or drugs may have.

It is therefore Company policy that employees may not bring to or consume alcohol or any unlawful drugs in the workplace during work time or during a period prior to work where the effects may carry over to the workplace. This includes business functions where the employee is representing the Company. Special rules may apply in relation to alcohol, where the Company sponsors an event for employees, customers or guests. In these circumstances any variation to the no-alcohol policy will be communicated in advance of the event.

The Company recognises that an employee with alcohol or drug dependency problems needs help and support from his/her employer. However, the Company also understands that it has a responsibility to all its employees and other stakeholders to ensure that any risks related to this are minimised.

Accordingly, Company policy involves two approaches:

- providing reasonable assistance to the employee with an alcohol or drug abuse problem who is willing to co-operate in treatment for that problem;
- disciplinary rules, enforced through disciplinary procedures, where use of alcohol or drugs (other than on prescription) affects performance or behaviour at work, and where either (a) an alcohol or drug dependency problem is not recognised or (b) where treatment is not possible or has not succeeded.

The Company has not the internal resources to provide or arrange treatment or other forms of specialist assistance. Such services are provided by doctors, hospitals and other agencies. Through this policy the Company will seek both the support an employee during such specialist help, and as far as possible, to protect his/her employment.

Assistance for Employees

The Company will, wherever possible, provide the following assistance to an employee:

- support during a period of treatment. This may include a period of sick leave or approved other leave, continuation in post or transfer to other work, depending upon what is appropriate in terms of the employee's condition and needs of the Company;
- the opportunity to remain or return to work following the completion of a course of treatment, as far as is practicable, in either the employee's own post or, where practicable, an alternative post.

Continued ...



Drug and Alcohol

... *Continued*

The Company's assistance will depend upon the following conditions being met:

- the Occupational Health Service/Company Approved Doctor (or where appropriate the individual's doctor or other appropriate professional) diagnoses an alcohol or drug dependency related problem;
- the employee recognises that he/she is suffering from an alcohol or drug dependency problem and is prepared to co-operate fully in referral and treatment from appropriate sources.

The Company and its employees must recognise the following limits to the assistance the Company can provide:

- where an employee fails to co-operate in referral or treatment arrangements, no special assistance will be given and any failure in work performance and behaviour will be dealt with through the Disciplinary Procedure;
- if the process of referral and treatment is completed but is not successful, and failure in work performance or behaviour occurs, these will be dealt with through the Disciplinary Procedure;
- an employee's continuation in her/his post or an alternative post during or after treatment will depend upon the needs of the Company at that time.

Where disciplinary action will apply

In line with the Company's disciplinary rules, the following will be regarded as serious misconduct:

- attending work and/or carrying out duties under the influence of alcohol or drugs;
- consumption of alcohol or drugs whilst on duty (other than where prescribed or approval has been given).

Breach of these rules will normally result in summary dismissal, and only in exceptional cases with either notice or the reduced disciplinary action of a final written warning be applied.

Where a breach of these rules occurs but it is established that an alcohol or drug dependency related problem exists and the employee is willing to co-operate in referral to an appropriate service and subsequent treatment, the Company will *suspend* application of the Disciplinary Procedure and provide assistance as described above. Employees who do not comply with the treatment suggested or continue to abuse alcohol or drugs will be subjected to the application of the Disciplinary Procedure.

Procedures which will apply

Alcohol or drug dependency related problems can come to the notice of management through:

- failures in work performance or behaviour necessitating possible use of the Disciplinary Procedure (eg. An employee smelling of alcohol at work, displaying aggressive and/or physical behaviour). In such situations the procedure described below will be followed;
- Other means, where an employee seeks or agrees to accept assistance on a voluntary basis and informs the Company management.

These procedures define management responsibilities and provide guidelines on:

- where assistance to an employee should be provided and the nature of and limits to such assistance;
- the application of the Company's Disciplinary Procedure.

Continued ...



Drug and Alcohol

... Continued

Through the Occupational Health Service/Approved Company Doctor (or if appropriate through the individual's doctor or other appropriate professional), the Company will provide confidential advice and support to the managers and supervisors of the individual on (a) whether an alcohol or drug related problem exists, (b) progress in treatment, (c) re-establishment or continuation at work of the individual or other appropriate arrangements, and (d) any requested assistance to the employee concerned where this is practicable and reasonable in the circumstances.

This does not include directly providing treatment or specialist help which is the responsibility of doctors, hospitals and other agencies working in the field.

Situations where use of the Disciplinary Procedure is appropriate

Abuse of alcohol or drugs can affect performance and behaviour at work, ie. either through Serious misconduct at work (where there is a direct and demonstrable breach of the disciplinary rules regarding alcohol or drug abuse at work), or where there is a falling off of standards of work performance or behaviour, and abuse of alcohol or drugs is a possible cause.

The immediate supervisor/line manager will be responsible for responding to such situations, carrying out either counselling or disciplinary investigations and interviews, supported as appropriate by a more senior manager or the Head of Resources.

In such interviews the possible existence of an alcohol or drug abuse problem should be explored. The manager is not required to diagnose the existence of an alcohol or drug abuse problem, merely to assess whether such abuse is a possible factor.

Any requirements of the Disciplinary Procedure regarding allowing the employee representation will be observed.

Determining the existence of an alcohol or drug abuse problem

Should the interviews lead to the conclusion that an alcohol or drug abuse problem might exist and the employee accepts referral, the manager should refer the matter to the Occupational Health Service/Company Approved Doctor (or where appropriate a report should be requested from the individual's doctor) who will be responsible for establishing whether or not a diagnosis of alcohol or drug dependence can be made.

Disciplinary action should be suspended until diagnostic advice is obtained. However, if appropriate, immediate suspension arrangements in the Disciplinary Procedure may be followed.

If the interviews fail to lead to the conclusion that an alcohol or drug abuse problem exists, or the employee rejects or fails to co-operate in referral, disciplinary action should be continued, where and as the situation justifies.

Confirmation that an alcohol or drug abuse problem exists and treatment arrangements

If a positive diagnosis of an alcohol or drug dependency problem is made, and the employee agrees to co-operate in treatment, treatment arrangements should commence.

Continued ...



Drug and Alcohol

... *Continued*

Where necessary, either the Occupational Health Service/Company Approved Doctor, or the individual's own doctor, will advise the employee regarding treatment and will be responsible for monitoring progress with this treatment.

The Company will request a regular update on the individual's progress from the medical professional concerned (the employee must agree to this). This advice should be available at least monthly following commencement of treatment and thereafter as appropriate. Disciplinary action should be discontinued unless the employee fails to co-operate on the treatment arranged. Should a diagnosis of alcohol or drug dependence not be confirmed or should the employee refuse to co-operate in treatment, the Company will review the facts and consider whether or not there needs to be a return to the use of disciplinary action.

Where medical certificates are submitted, sick leave should be given. Should the employee continue to be fit for work during the period of treatment, he/she should be permitted to continue in his/her post or alternative work unless such an arrangement would have an adverse effect on Company services. In such circumstances, annual or unpaid leave should be approved or, exceptionally, suspension arranged.

If an employee has been off work during the period of treatment, before returning to duty, he/she will be seen by the Occupational Health Service/Company Approved Doctor, or a report sought from the individual's doctor to advise management regarding capability for continuation in her/her own post and whether any special supervision or other arrangements are required.

Every effort should be made to comply with the advice provided. If it is not reasonably practicable to do so, and as a result, the employee is not able to resume duty, employment may be terminated on the grounds of incapacity (ill health).

If an employee is again involved in disciplinary situations resulting from alcohol or drug abuse related problems, a second referral to the Occupational Health Service/Company Approved Doctor and suspension of the Disciplinary Procedure may be appropriate. If they advise positively on the possibilities of further treatment or help and the willingness of the employee to co-operate, the Disciplinary Procedure may be suspended again to permit treatment and help to be undertaken. This second referral will not apply if the further disciplinary problems involve serious misconduct. Third and subsequent referrals are not permissible.

Situations where a disciplinary situation does not exist

There may be situations where the possible existence of alcohol or drug abuse problems affecting an employee comes to a manager's attention, although there is or has been no discernable affect on work performance or behaviour. This could arise if an employee confides in his/her manager about an alcohol or drug abuse problem, or a manager could see a need to approach an employee after observing possible "indicators" of an alcohol or drug abuse problem, eg. an absence pattern, information provided by the individual's colleagues, etc.

In such situations, the Company would wish employees to feel they could seek help from their employer (in complete confidence) without worry that their job security would be in jeopardy.

Continued ...



Drug and Alcohol

... Continued

Accordingly if managers should be faced with a situation of this type they should seek the advice of the Head of Resources in the first instance who may then suggest:

- seeking the advice of the Occupational Health Service/Company Approved Doctor or other appropriate professional regarding how the matter should be dealt with;
- discussing the situation with the individual and, if appropriate, arranging for the employee to be interviewed by the Occupational Health Service/Company Approved Doctor or at least to attend their own doctor;
- as in the procedure described above, the Occupational Health Service/Company Approved Doctor/their own doctor will play a facilitating role in seeking to establish whether or not a problem exists and advising and directing the employee towards appropriate forms of treatment and help.

These steps cannot be taken without the co-operation of the employee. If the individual does not wish to co-operate, no further action should be taken other than, perhaps, encouraging them to contact one of the external organisations available to provide appropriate advice and guidance. In the UK, these include:

Alcohol Dependence	
DRINKLINE Helpline 0800 917 8282	AL-ANON www.al-anonuk.org.uk
DRINKAWARE www.drinkaware.co.uk	AA OF GREAT BRITAIN www.alcoholics-anonymous.org.uk
ADDACTION www.addaction.org.uk	

Drug Dependence
ADDACTION www.addaction.org.uk
TALK TO FRANK www.talktofrank.com
NARCOTICS ANONYMOUS http://ukna.org

NHS Choices Website
<i>Alcohol Dependence:</i> www.nhs.uk/conditions/Alcohol-misuse/Pages/Introduction.aspx
<i>Drug Dependence:</i> www.nhs.uk/Livewell/drugs/Pages/Drugtreatment.aspx

Should an employee take up the opportunity of assistance on this voluntary basis there need be no further formal involvement of management in terms of action or the right to learn of progress with treatment. It may be, however, that the employee would wish or agree to further involvement of management as a means of assisting progress with treatment. Use of the Disciplinary Procedure and/or application of the approach described above would only be appropriate if subsequently the employee is involved in a breach of Company rules.

Should the problems of the employee develop to an extent that his/her continuation in post or employment became impossible, it may be necessary to identify alternative work or arrange for termination on the same basis as the Company operates for employees with problems of incapacity due to ill health.

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Stop and Search

The Right to Stop and Search

Employees are reminded that, by accepting the terms and conditions outlined in their Contract of Employment, they have expressly agreed to the Company exercising the right of stop and search.

The purpose of this policy is to outline:

- the Company's policy in relation to stopping and searching employees;
- the manner in which searches will be carried out;
- the implications if an employee refusing to comply with a search request;
- disciplinary action following a positive search.

Other security arrangements implemented by the Company which are not related to stop and search are not covered by this policy and are detailed elsewhere.

Company Policy on Stop and Search

The Company reserves the right to undertake searches of employees within its premises. This is to protect both the Company and its employees from illegal activities such as theft of Company property or property belonging to another employee or other person; and the possession or supply of any substance which might be in breach of Company policy in relation to alcohol and/or drugs.

Employees are advised that a search does not indicate that they are under any suspicion of wrongdoing and searches may be carried out randomly. However, the Company reserves the right to stop and search an employee when it reasonably suspects that they have committed an illegal act or an act in breach of Company policy.

In accordance with employees' terms and conditions of employment, the Company reserves the right to carry out searches, including:

- a physical search of the employee where they will be asked to remove their jacket and empty all pockets;
- a search of all baggage (both personal and Company property);
- a search of any vehicle on the Company's property (both personal and owned by the Company); and
- a search of all work areas (including but not limited to desks, lockers and cabinets, locked or otherwise). This may also include search of any electronic devices such as laptop or 'phone owned by the Company in compliance with the appropriate Company policy.

The Company will ensure that the level of search is fair and reasonable, taking into account all the circumstances giving rise to it.

If the Company suspects that a non-employee such as a contractor or visitor has committed an illegal act such as theft of Company property, no search will be attempted or carried out. Under these circumstances the police will be informed immediately and any evidence gathered handed to them.

The Manner and Location of Stop and Search Activity

Only authorised officers of the Company who have been trained in how to conduct searches will undertake searches on behalf of the Company. This is to ensure that the employees' dignity is protected and the selection of employees is not discriminatory.

Continued ...



Stop and Search

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Searches may occur at random when employees enter or leave the premises and/or in circumstances where the Company reasonably suspects that an employee has committed an unlawful act or act in breach of Company policy. If a search is undertaken on a random selection of employees, a demonstrably fair selection process will be used.

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

Searches of baggage, vehicles and work areas will be carried out by an authorised officer in the presence of the employee in question and another authorised officer.

Refusal to Comply with the Stop and Search Policy

If an employee refuses to undergo a search, the employee will be asked to reconsider his/her refusal. If the employee maintains his/her refusal to undergo a search, the individual's manager or other senior manager will be called. They will consider the employee's stated reasons for the refusal and, if these are deemed reasonable, no further action will be taken against the employee. However, the incident including the reasons for the employee's refusal to be searched will be recorded in the employee's personnel file.

If an employee unreasonably refuses to undergo a search (including if they subsequently refuse to stay on the Company's premises when requested to do so) they will be suspended on full pay and the Company will undertake a full investigation. This may lead to disciplinary action in line with the Company's Disciplinary Procedure, which could result in dismissal for gross misconduct where appropriate.

If the Company believes that there is evidence that an employee has committed an illegal act this will be reported immediately to the police.

Disciplinary Action following a Positive Search

If a search reveals evidence that an employee has committed an act which is illegal or in breach of Company policy, then the employee's manager or another senior manager as appropriate will be called, and the employee will be given the opportunity to explain the situation. If the manager is not satisfied with the explanation the employee will be suspended immediately on full pay pending a full investigation. This may lead to disciplinary action in line with the Company's Disciplinary Procedure, which could result in dismissal for gross misconduct where appropriate.

If the Company reasonably believes that there is evidence that an employee has committed an illegal act, this will be reported immediately to the police.

If an employee is unhappy about the way in which a search has been conducted, or thinks they have been discriminated against or otherwise treated unfairly they can raise this in the first instance with their line manager. If an employee prefers to raise a formal complaint he/she should refer to the Company's Grievance Procedure.

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Introduction

The Company is committed to the highest standards of openness, probity and accountability.

An important aspect of accountability and transparency is a mechanism to enable employees and other members of the Company to voice concerns in a responsible and effective manner. It is a fundamental term of every contract of employment that an employee will faithfully serve his or employer and not disclose confidential information about the employer's affairs. Nevertheless, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organisation then this information should be disclosed *internally* without fear of reprisal, and there should be arrangements to enable this to be done independently of line management (although in relatively minor instances the line manager would be the appropriate person to be told).

The Public Interest Disclosure Act in the UK gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. The Company has endorsed the provisions set out below to ensure that no employees should feel at a disadvantage in raising legitimate concerns. It is recognised that not all jurisdictions in which the Company operates has such provisions in which case this policy shall apply as far as is practicable.

It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by the Company nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures.

Scope of Policy

This policy is designed to enable employees of the Company to raise concerns *internally* and at a high level and to disclose information which the individual believes shows malpractice or impropriety. This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures eg. disciplinary. These concerns could include:

- financial malpractice or impropriety or fraud;
- failure to comply with a legal obligation or statutes;
- dangers to health and safety or the environment;
- criminal activity;
- improper conduct or unethical behaviour;
- attempts to conceal any of these.

Safeguards

Protection

This policy is designed to offer protection to those employees of the Company who disclose such concerns provided the disclosure is made:

- In good faith;
- In the reasonable belief of the individual making the disclosure that it tends to show intentional malpractice or impropriety and if they make the disclosure to an appropriate person. It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case, malicious or wild allegations could give rise to legal action on the part of the persons complained about.

Continued ...



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Confidentiality

The Company will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder nor frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

Anonymous Allegations

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the Company. In exercising this discretion, the factors to be taken into account will include (a) the seriousness of the issues raised, (b) the credibility of the concern, and (c) the likelihood of confirming the allegation from attributable sources.

Untrue Allegations

If an individual makes an allegation in good faith which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he/she persists in making them, disciplinary action may be taken against that individual.

Procedures for Making a Disclosure

On receipt of a complaint of malpractice, the employee who receives and takes note of the complaint must pass this information as soon as is reasonably possible to the appropriate designated investigating officer as follows:

- complaints of malpractice will be investigated by the appropriate Director (the territorial Managing Director or Corporate Director) unless the complaint is against the Director or in any way related to the actions of the Director. In such cases, the complaint should be passed to the Director of Corporate Services as the investigating officer.
- In the case of a complaint which is in any way connected with the Director of Corporate Services the complaint will be passed to the Executive Chairman as the alternative investigating officer.
- Complaints against the Executive Chairman should be passed to either the Director of Corporate Services or a non-executive Board Member who will either act as investigating officer or nominate an appropriate internal/external investigating officer.
- The complainant has the right to bypass the line management structure and take their complaint direct to a director of the ultimate owners, Lifestyle Securities Limited who shall have the right to refer the complaint back to management if he/she feels that the management without any conflict of interest can more appropriately investigate the complaint.
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If there is evidence of criminal activity then the investigating officer should inform the police. The Company will ensure that any internal investigation does not hinder a formal police investigation.

Timescales

Due to the varied nature of these sorts of complaints, which may involve internal/external investigators and/or the police, it is not possible to lay down precise timescales for such investigations.

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The investigating officer should ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations.

The investigating officer should as soon as practically possible send a written acknowledgement of the concern to the complainant and thereafter report back to them in writing the outcome of the investigation and on the action that is proposed. If the investigation is a prolonged one, the investigating officer should keep the complainant informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded.

All responses to the complainant should be in writing and sent to their home address marked "confidential".

Investigating Procedure

The investigating officer should follow these steps:

- Full details and clarifications of the complaint should be obtained;
- The investigating officer should inform the employee(s) against whom the complaint is made as soon as is practically possible. The employee(s) will be informed of their right to be accompanied by a trade union or work colleague at any future interview or hearing held under the provision of these procedures. At the discretion of the investigating officer and dependant on the circumstances of the complaint an alternative representative may be allowed, eg. The individual's legal representative.
- The investigating officer should consider the involvement of the Company auditors and the police at this stage and should consult with the Executive Chairman/business owner if appropriate.
- The allegations should be fully investigated by the investigating officer with the assistance, where, appropriate, of other individuals/bodies.
- A judgement concerning the complaint and validity of the complaint will be made by the investigating officer. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement. The report will be passed to the Executive Chairman and owners.
- The Executive Chairman/owners will decide what action to take. If the complaint is shown to be justified, then they will invoke the Disciplinary Procedure or other appropriate Company procedures.
- The complainant should be kept informed of the progress of the investigations and, if appropriate, of the final outcome.
- If appropriate, a copy of the outcomes will be used to enable a review of Company procedures.

If the complainant is not satisfied that their concern is being properly dealt with by the investigating officer they have the right to raise it in confidence with the Executive Chairman/owner or one of the designated persons described above.

If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcome, the Company recognises the lawful rights of employees and ex-employees to make disclosures to prescribed persons or body (eg. The Health & Safety Executive).

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Dress Code

Objectives

The Company has developed a Dress Code to address safety issues in a diverse work environment, to acknowledge cultural sensitivities, to allow employees to be easily identified and to establish a consistent corporate appearance in keeping with the brand, the environment and the nature of the Company's work.

The Dress Code aims to:

- present a recognisable, smart and professional image of employees to the community;
- ensure that employees are appropriately dressed for their duties, and
- ensure that adequate protective clothing is provided to assist in maintaining the safety and health of employees and environmental conditions.

Corporate Wear

Where corporate attire is issued it is normally required to be worn at all times the recipient is at work and on duty.

Three sets of uniform are usually provided (Wear/Wash/Wardrobe) and must always be clean and in good order.

No adornments should be worn with the uniform other than those issued by the Company (eg. identity badge, company logo).

Discreet jewellery is permitted provided it satisfies the Company's health and safety requirements and does not distract from the corporate appearance nor is regarded as inappropriate or likely to cause offense. Similarly, tattoos, body piercings and the like must be discreet and covered or removed where possible and must not be of an inappropriate or potentially offensive nature. Racist and political slogans, marks and badges are not permitted.

All employees are expected to have personal hygiene of a high standard, be clean and well-groomed. Grooming styles, clothing and jewellery *dictated* by religious beliefs and ethnicity are not restricted provided that the Company's health and safety requirements are met.

Employees such as repair and production crews are issued with safety wear which must be worn at all times whilst at work and on duty. Items will be checked prior to undertaking work and must conform to the specified standard.

Employees should not wear any piece of corporate clothing that is associated with the Company after working hours except when travelling via a reasonable route to or from work.

Employees must recognise that when wearing corporate attire they are representing the Company and should therefore ensure their behaviour reflects their responsibilities under the Code of Conduct (see page 28).

All uniforms, including identity badges, remain the property of the Company and should be returned at the conclusion of employment.

An employee who fails to comply with this policy may be sent home to change. Time taken to comply will be considered as leave. Frequent breaches of this policy may result in disciplinary action.

Continued ...



Dress Code

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Non-uniformed Employees

Some employees (eg. Corporate employees working in head office) are not provided with corporate wear (other than when required for specific duties) and are permitted to wear their own clothes provided they conform to the following standard:

- The official dress code is Business/Business Casual. Sports, outdoor wear and Casual is not acceptable.
- All clothes should be clean and in good shape. Discernable rips, tears or holes are not permitted.
- Clothes must project professionalism and not be too revealing or inappropriate.
- Jewellery is permitted provided it satisfies the Company's health and safety requirements and cannot be regarded as inappropriate or likely to cause offense. Similarly, tattoos, body piercings and the like must be discreet and covered or removed where possible and must not be of an inappropriate or potentially offensive nature. Racist and political slogans, marks and badges are not permitted.
- All employees are expected to have personal hygiene of a high standard, be clean and well-groomed. Grooming styles, clothing and jewellery *dictated* by religious beliefs and ethnicity are not restricted provided that the Company's health and safety requirements are met.
- Identity badges are to be worn or displayed as required.

In lieu of being provided with corporate wear, non-uniform employees will be allocated a dress allowance £100 per annum. This sum may be increased at the discretion of the Company for those employees required to attend formal or special occasions on the Company's behalf.

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Anti-Money Laundering

The relevant requirements of the UK Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 apply to QHL and its subsidiary companies.

The Corporate Services Director is designated at the Compliance Officer with the Head of Finance and territorial office managers providing appropriate support.

Customers and trading partners will be validated in accordance with the Company's financial regulations, including checks to independently ascertain:

- proof of identity, residential address and date of birth;
- source of funds;
- tax compliance.

Additionally, in the case of companies;

- ownership and organisational structure;
- company name and registration number;
- registered address;
- country of legal jurisdiction;
- names and addresses of directors, senior officials and those having controlling interest;
- details of bankers and accountants.

Other information may be obtained in questionable or uncertain circumstances. Some customers, such as governments and municipalities, will be excluded from such enquiries.

All such information will be assessed and recorded. Satisfactory results enable the Company to approve the customers for trading purposes whereas results failing to satisfy the assessment criteria will lead to the termination of any possible trading relationship and may be reported to the relevant authorities.

In respect of the Company or any of its businesses needing to provide similar information to (prospective) trading partners it shall do so, first confirming that the request is legitimate and that the Company's commercially-sensitive or an employee's personal information is protected by means of a Non-circumvention/Non-disclosure Agreement and/or Data Protection legislation.

Appropriate training will be provided for relevant employees in both corporate and territorial businesses.

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