

## **ENVIRONMENTAL AND SUSTAINABILITY POLICY STATEMENT**

Good Environmental performance and stewardship is high on the Key Electrical & Data Services Limited list of corporate priorities because we recognise that the protection of the natural and built environment is of paramount importance, not only to current generations but also to future generations.

During the completion of all works and projects, we will demonstrate a strong sense of responsibility for the protection of both the built and natural environment where our activities have a potential to cause either a direct or indirect effect on the environment.

Key Electrical & Data Services Limited will seek to be in the forefront of environmental care within the sectors that we operate in. As part of our commitment to protect the environment we shall

- ❖ Comply with the Company's Environmental policy and directives and co-operate with statutory bodies to continually improve upon standards where reasonably practical and economic to do so.
- ❖ Assess the environmental effects of its activities.
- ❖ Integrate environmental factors into business decisions.
- ❖ React rapidly to any incident that may pose a threat to the environment.
- ❖ Seek to influence our suppliers to meet the same standard of care for the environment as this Company.
- ❖ Actively co-operate with educational and conservation groups.
- ❖ Ensure that all employees carry out their duties in line with the above statements.

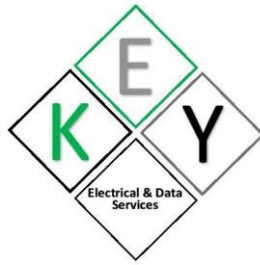
A copy of this policy is made available to all Key Electrical & Data Services Limited employees, Contractors and Sub-Contractors. Adequate resources will be provided to support and achieve this policy.

Signed .....

K. J. SELLWOOD

A handwritten signature in blue ink that reads 'K. J. Sellwood'.

Date ...17-01-18.....



## **EQUAL OPPORTUNITIES POLICY**

The company is committed to providing equal opportunities in all aspects of employment particularly recruitment, promotions and training.

The company will not tolerate discrimination on any of the following grounds:

- ❖ by treating an individual on grounds of sex, colour, marital status, race, nationality or ethnic or national origin, or membership or non-membership of a trade union less favourably than others;
- ❖ by expecting an individual on the above grounds to comply with requirements for any reason whatsoever related to their employment, which are different to the requirements for others;
- ❖ by victimisation of an employee;
- ❖ by harassment of an employee;
- ❖ by imposing work that is more onerous on one employee than on others; or
- ❖ by any other act, or omission of an act, which has its effect the disadvantaging of an employee or applicant against another, or others, purely on the above grounds.

It is the policy of the company to ensure that entry into the company is determined solely by the application of objective criteria and individual merit. Equality will be accorded to applicants and employees without regard to disability, race, religion, gender, marital status, sexual orientation, colour, national or ethnic origin.

The objective of the company is to employ individuals who are suitably qualified or who have the ability to develop the skills necessary to undertake the obligations imposed by the position they occupy.

Harassment or victimisation at work will not be overlooked or condoned. Such behaviour will be considered a serious disciplinary matter.

## **ANTI-HARASSMENT POLICY**

The company is committed to creating a working environment that is free from harassment and intimidation and will not permit any form of harassment or discrimination based on disability, race, religion, marital status, ethnic origin, sexual orientation or colour.

It is recognised that differences may arise where people of different sex, interest and culture work together. If, however, any member of staff feels humiliated or threatened by the behaviour of others then the individual responsible for causing this reaction will be liable to disciplinary action.

Managers have a responsibility to communicate this policy to staff members and to investigate all complaints of harassment against any member of staff.

## SEXUAL HARASSMENT

Conduct, which is based on a person's sex in a verbal, physical or non-verbal manner that is unwanted and offensive to the recipient, is sexual harassment. This form of conduct is unlawful under the Sex Discrimination Act 1975 and is totally unacceptable. The individual responsible will be held personally liable and may be subject to criminal proceedings.

Following is a non-exhaustive list of examples, which will be regarded as sexual harassment:

- ❖ physical conduct of a sexual nature- this includes unwanted physical conduct ranging from unnecessary touching, patting or pinching or brushing against another employee's body to assault :
- ❖ verbal conduct of a sexual nature – includes unwelcome sexual advances, propositions or pressure for physical activity: continual suggestions for social activity outside the workplace when it has been made clear that such suggestions are unwelcome; offensive flirtations; suggestive remarks, innuendoes or lewd comments;
- ❖ non-verbal conduct of a sexual nature – includes the display of pornographic or sexually suggestive pictures, objects or written materials: leering, whistling or making sexually suggestive gestures; and
- ❖ sex based- conduct- this refers to conduct that ridicules or it is intimidatory or is physically abusive of an employee because of his/her sex, such as derogatory or degrading abuse or insults which are gender- related or offensive comments about appearance or dress.

## RESPONSIBILITIES OF ALL EMPLOYEES

All managers and employees are responsible for ensuring a harassment- free working environment. In particular if you are responsible for other employees you must ensure that:

- ❖ you are aware of, and understand the organisation's policy to Anti-Harassment and Equal Opportunities;
- ❖ you advise and inform your team to increase awareness and understanding of the organisations policies;
- ❖ your work environment is free of visual harassment;
- ❖ you deal with physical and verbal harassment immediately even it is not brought to your attention;
- ❖ you are supportive of an individual who states that they have been harassed and treat the matter with the appropriate sensitivity;
- ❖ you maintain confidentiality in relation to all cases of harassment that you have dealt with or been involved in,
- ❖ you ensure that the harassment does not continue after the case has been reported; and
- ❖ you ensure that your conduct does not cause offence.

## COMPLAINTS PROCEDURE

If you are being harassed you should, if possible, attempt to resolve the problem informally in the first instance. It may be sufficient to explain to the person engaging in the unwanted conduct that the behaviour in question is not welcome and that it offends you and makes you feel uncomfortable. The person may not realise that his/her behaviour is causing offence.

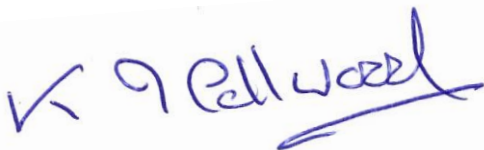
If it is too difficult or impossible to confront the individual you should request help from your immediate supervisor/Personnel manager or any other staff member who would be in a position to offer advice.

If the behaviour continues you should report it to a Director with details of dates, times etc to enable him/her to investigate the allegations and decide upon appropriate action.

The appropriate manager will examine the details of the incident and it may be necessary to get further details before a decision is made. All information will be treated as confidential and everyone will be treated with respect during the investigation. The details of the case will only be available to those persons who are involved in the investigation. If the Company decides to proceed with disciplinary action then the appropriate disciplinary procedures will be followed.

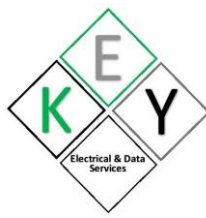
If it is decided not to take action then you may need to appeal the decision using the grievance procedure.

It is a disciplinary offence to victimise or retaliate an employee for bringing a complaint of sexual harassment.



Company Secretary

17<sup>th</sup> January 2018



## **HEALTH & SAFETY POLICY**

This document contains the Policy Statement of Key Electrical & Data Services Limited. It has been prepared after due consultation with those involved in its operation and has the full backing and authority of its board of Directors.

The company is engaged in the supply and installation of relevant technologies. Based locally but working nationally, a prime objective is the concern over Health, Safety and welfare of all those who participate in any activity associated with the company.

It is the policy of the company that all its activities shall be conducted in a way which will ensure, so far as is reasonably practical, the health, safety and welfare of its employees and those who participate at any activity or operation within the scope and under the jurisdiction of the company. This policy will be actively pursued by the management of the company and will look to sub-contractors and working partners, to hold and implement Health & Safety Policies.

The company acknowledges that matters of Health, Safety and risk are complimentary to the competent management of the organisation. Safe working practices and accident prevention techniques are the most important aspect of managing the company and all its activities and operations. The company regard the requirements of the Safety at Work Act 1974, the Management of Health & Safety at Work regulations (1999) and other statutory requirements to be the minimum standards of Health, Safety and Welfare to be achieved both in relation to its own area of activity and operations and all those of its sub-contractors and partner organisations.

The company therefore consider it the duty of management and staff to:-

- ❖ Provide safe premises, access/egress, equipment, machinery and appliances
- ❖ Ensure safe arrangements for handling and moving of articles and substances
- ❖ Maintain a safe workspace, plus adequate arrangements for welfare including issues of stress
- ❖ Provide appropriate supervision, instruction, information and training to ensure the health and safety of employees
- ❖ Whenever required, personal protective equipment (PPE) and clothing will be provided to and used by employees and volunteers
- ❖ Induct new employees and update existing employees with information on emergency access and exit locations, fire safety equipment and the building code of practice should an emergency occur
- ❖ Provide ongoing training and support, including Health & Safety and First Aid training
- ❖ Maintain an accurate accident reporting procedure
- ❖ Carry out Risk Assessments where required in order to remove risks or reduce risks as is reasonably practical
- ❖ Ensure that Health & Safety and risk limitation measures are pursued by company staff whilst completing site surveys and system installations
- ❖ Not to smoke inside any office/store premises, clients premises or vehicles used on the company business, nor to cause exposure to passive smoking by smoking close to the company staff in other confined spaces during working hours

The policy will be applied in all aspects of the company activities and will be reviewed periodically to keep up to date with changes to legislation and good practice

A handwritten signature in cursive script, appearing to read 'M. Sellwood'.

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Tony Sellwood  
Director

17.01.2018



## **SOCIAL ACCOUNTABILITY AND ETHICAL POLICY**

Key Electrical & Data Services Ltd recognises the need for social responsibility and ethical behaviour and are committed to the following:

- ❖ Health and safety management for our employees, contractors, visitors and the public
- ❖ Recognising the right of employees and associates to freedom of association and collective bargaining
- ❖ No discrimination against employees and associates on the grounds of sex, race, colour, religion or age
- ❖ Disciplinary practices in accordance with the ACAS Code of Conduct
- ❖ Working hours in accordance with the European Union's Working Time Directive
- ❖ Ensuring no child or forced labour exists within our suppliers or supply chain
- ❖ That our suppliers are not involved in the arms trade.
- ❖ That our suppliers practice similar accountability & ethical values

We will endeavour to comply with all applicable legislation and other requirements to which we subscribe.

Management are committed to ensuring continual improvement in corporate social responsibility and accountability as well as labour conditions.

High moral and ethical standards are established for employees and associates to assure trust, respect and confidence of the people within the company and in our clients. A fair and open contract requires that our business activities be conducted in a manner that preserves the integrity of the contract process and avoids any conflict of interest and ethical concerns.

In addition all employees and associates shall conform to their occupation's professional ethics.

Disclosure of a potential conflict of interest is required at the earliest possible time.

Possible conflicts or ethics violations may include, but not limited to:

- ❖ Misuse of position/ knowledge
- ❖ Improper gifts (gratuities)
- ❖ Improper use or disclosure of information
- ❖ Improper influence in contracts
- ❖ Aiding in a violation (collusion)
- ❖ Relatives in the client (nepotism)
- ❖ Political activities while in work status
- ❖ Any other activities that reflect unfavourably upon the company

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Ken Sellwood

17.01.2018