



NTIA

Ethical Code of Practice

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This code of practice brings together policies that will help the organisation to achieve and maintain its ethical standards.

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ETHICAL CONDUCT POLICY

At The Night Time Industries Association (“NTIA”) we are committed to doing the right thing in all aspects of our business. This requires that every day everyone working for us needs to have an unwavering dedication to the highest ethical standards. It is fundamental that every employee and worker carries a share of the responsibility for our conduct and contributes to our success.

Our culture is built on four key values. These shape our behaviour toward customers and toward one another. Together, they drive our organisation forward. The values are:

INTEGRITY

We demand of each other and ourselves the highest standards of individual and corporate integrity. We do the right thing because it is the right thing to do. It is every employee’s responsibility to safeguard organisation assets and foster an environment of trust with our workers, customers, communities, and suppliers. We should always comply with all our organisation policies, meet legal requirements, and create an environment of transparency in which all reporting requirements are met.

EXCELLENCE

We routinely challenge ourselves to improve our products, services, and processes. We strive always to understand our customers' businesses and help them achieve their goals. We serve our customers by anticipating and responding to their needs. We are dedicated to diversity, fair treatment, mutual respect, and trust. We are committed to producing products and serving our customers with zero harm to people and the environment.

TEAMWORK

We foster an environment that encourages innovation and creativity and delivers results through collaboration. We practice leadership that teaches, inspires, and promotes full participation and career development. We encourage open and effective communications and interaction with all workers and stakeholders, actively working together to keep each other safe and in good health. We believe that none of us is as capable or effective as all of us – and together, there's no limit to what we can achieve.

ACCOUNTABILITY

We honour the commitments we make and take personal responsibility for all actions and results. Our actions match our words, and we demand responsibility – from ourselves and others – in everything we do. We operate on the basis that continuous improvement is an integral part of our culture.

Regardless of our position within the organisation, we share equal accountability for:

- Conducting business with integrity, preserving our strong reputation and expanding our position in the marketplace.
- Fostering an inclusive culture in which we all feel respected and could reach our full potential.
- Providing a healthy and safe work environment and complying with applicable environmental laws and regulations wherever we operate around the world contributing to the sustainability of the communities in which we live and work.

Modern Slavery Statement

A) ORGANISATION

This statement applies to all companies within and associated with **The Night Time Industries Association (“NTIA”)** (*referred to in this statement as ‘The Organisation’*). The information included in the statement refers to the financial year 2024-2025.

B) ORGANISATIONAL STRUCTURE

The Night Time Industries Association (NTIA) operates under a centralised business structure, overseen by a Board of Directors. While there is one central office registered at Grove House, 2 Woodberry Grove, London, N12 0DR, our operations span various regions in the United Kingdom.

Our main activities include advocating for and supporting the nighttime economy, and representing diverse venues, including nightclubs, bars, music venues, restaurants, hotels, festivals, and events.

Our efforts are not limited by seasonality, as we work tirelessly throughout the year to champion the interests of our members and ensure the vitality of the nighttime economy. The labour supporting NTIA's operations is primarily carried out within the United Kingdom, encompassing various regions where our initiatives and advocacy efforts are implemented.

C) DEFINITIONS

The Organisation considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or having restrictions placed on freedom of movement.

D) COMMITMENT

The Organisation acknowledges its responsibilities in tackling modern slavery and is committed to complying with the provisions of the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices about its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its services is obtained using slavery or human trafficking. The Organisation strictly adheres to the minimum standards required about its responsibilities under relevant employment legislation in England, Scotland, Wales and Ireland, and in many cases exceeds those minimums for its employees.

E) SUPPLY CHAINS

The Night Time Industries Association (NTIA) operates within a diverse and multi-faceted supply chain. Our first-tier suppliers often consist of intermediary traders, who in turn maintain contractual relationships with lower-tier suppliers. This structure adds a layer of complexity to our supply chain, requiring careful management and coordination to ensure smooth operations and the fulfilment of our objectives.

In addition, NTIA has established agreements with trade unions regarding bargaining terms and conditions. These agreements define the bargaining units to which they apply, outlining the scope and parameters of our engagement with labour representatives. This collaborative approach ensures that the interests of both our organization and our workforce are effectively addressed, fostering a harmonious and productive working environment.

F) POTENTIAL EXPOSURE

The Night Time Industries Association acknowledges that its primary exposure to the risk of slavery and human trafficking primarily exists within its supply chains, particularly in areas where protection against breaches of human rights may be limited. This risk is most pronounced in sectors involving labour-intensive processes or in regions where regulatory oversight may be less stringent.

Overall, the Association views its exposure to slavery and human trafficking as relatively high due to the nature of its operations and the complexity of its supply chains. Nonetheless, the Association remains committed to combating these practices and ensuring that they do not occur within its business operations or within any organisation that supplies goods and services to it.

To address this risk, the Association has implemented robust measures to prevent and detect instances of slavery and human trafficking within its supply chains. These measures include conducting thorough due diligence on suppliers, assessing the labour practices of key partners, and implementing policies and procedures to uphold human rights standards. Additionally, the Association actively collaborates with industry partners, government agencies, and civil society organisations to share best practices and strengthen collective efforts to combat modern slavery and human trafficking in all its forms.

G) IMPACT OF COVID-19

During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-19. This created several challenges for the Organisation, as it did for others across the nation.

The Organisation concludes that the COVID-19 pandemic did not adjust the risk of modern slavery to a level above that which existed before the pandemic, as set out under 'POTENTIAL EXPOSURE' above. Its use of suppliers dropped significantly because homeworking was swiftly implemented in March 2020 which meant that its premises, from which it usually conducts day-to-day business, were temporarily closed. Several of our workforce were placed on furlough as a result of the drop in demand for our services, meaning there were no additional temporary labour needs.

During the pandemic, the Group's employees still had access to the grievance procedure to raise any concerns that they may have had.

In line with emergency legislation passed by the Government, Group employees have been paid Statutory Sick Pay during periods of self-isolation where it has not been possible to agree to a temporary period of homeworking. The Organisation decided from the outset

of the pandemic to ensure that all of the workforce who were required to self-isolate following public health guidelines continued to receive full pay during their absence.

The Organisation's modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

H) STEPS

The Organisation carries out due diligence processes to ensure slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

Following section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- Periodic reviewing of supplier contracts to include termination powers if the supplier is, or is suspected, to be involved in modern slavery.

I) KEY PERFORMANCE INDICATORS

The Night Time Industries Association has established key performance indicators (KPIs) to evaluate and measure its effectiveness in preventing and addressing modern slavery within the organisation and its supply chains. These KPIs serve as benchmarks to assess the impact of our initiatives and the success of our efforts in combating modern slavery.

Some of the key performance indicators established by the Association include:

- **Supplier Audits:** Conduct regular audits and assessments of suppliers to evaluate their compliance with anti-slavery policies and regulations.
- **Training and Awareness:** Monitoring the participation and effectiveness of training programs aimed at raising awareness among employees and suppliers about modern slavery risks and prevention measures.
- **Incident Reporting:** Tracking and analysing reports of suspected instances of modern slavery or human trafficking within the organisation or its supply chains, and assessing the timeliness and effectiveness of response mechanisms.
- **Continuous Improvement:** Monitoring progress over time identifying areas for improvement in anti-slavery policies, procedures, and practices, and implementing measures to enhance effectiveness and responsiveness.

By regularly monitoring and evaluating these key performance indicators, the Night Time Industries Association aims to ensure continuous improvement in its efforts to combat modern slavery and uphold human rights across its operations and supply chains.

J) POLICIES

The Organisation has the following policies which further define its stance on modern slavery:

- Modern Slavery Policy
- Supplier Code of Conduct
- Recruitment Policy

K) TRAINING

The Organisation provides modern slavery awareness training to staff and members to effectively implement its stance on modern slavery.

L) SLAVERY COMPLIANCE OFFICER

The Organisation has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action about the Organisation's obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval *26th February 2024*



Signed.....
Director of Operations

Date *1st March 2024*

Child Labour

The Company will ensure that all relevant legislation and restrictions are adhered to in regards to the use of young workers. We will ensure that the necessary checks are carried out to verify an individual's age and right to work, and that relevant Health and Safety codes are adhered to.

Where required, the Company will ensure that the relevant employment permit is received from the education department of the local council.

We will also carry out spot checks when required and will retain copies of age records within the place of work.

Restrictions For Children Aged 14 Years Old

There are restrictions that apply to the employment of children aged 14 years old, as follows:

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- You must not work before 7.00 am. or after 7.00 pm. on any day;
- You must not work for more than 2 hours on any day when you are required to be at school;
- You must not work during school hours;
- You must not work for more than 5 hours on a Saturday or on weekdays during school holidays;
- You must not work for more than 2 hours on a Sunday;
- You must not work for more than 4 hours in any day without a rest break of 1 hour.
- You must not work for more than 12 hours in any school week; and
- You must not work for more than 25 hours a week during school holidays.

Restrictions For Children Aged 15 And 16 Years Old

There are restrictions that apply to the employment of children aged 15 and 16 years old, as follows:-

- You must not work before 7.00 am. or after 7.00 pm. on any day;
- You must not work for more than 2 hours on any day when you are required to be at school;
- You must not work during school hours;
- You must not work for more than 8 hours on a Saturday or on weekdays during school holidays;
- You must not work for more than 2 hours on a Sunday;
- You must not work for more than 4 hours in any day without a rest break of 1 hour.
- You must not work for more than 12 hours in any school week; and
- You must not work for more than 35 hours a week during school holidays.

Restrictions For Young Workers Over Compulsory School Leavers Age

There are restrictions that apply to the employment of young workers over compulsory school leaver's age, as follows: -

- You must not work for more than 8 hours a day;
- You must not work for more than 40 hours a week;
- You must not work for more than 4.5 hours in any day without a rest break of 30 minutes.
- You must have a rest period of not less than 48 hours in each seven day period.

Anti-Bribery Policy

A) INTRODUCTION

Bribery is, in the conduct of the organisation's business, the offering or accepting of any gift, loan, payment, reward or advantage for personal gain as an encouragement to do something which is dishonest, illegal or a breach of trust.

Bribery is a criminal offence. The Organisation prohibits any form of bribery. We require compliance, from everyone connected with our business, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to us and we have a zero tolerance attitude towards corrupt activities of any kind, whether committed by NTIA employees or by third parties acting for or on behalf of The NTIA.

B) OFFENCES

It is a criminal offence to:

- offer a bribe;
- accept a bribe;
- bribe a foreign official;
- as a commercial organisation, to fail to prevent a bribe.

You should be aware that if you are found guilty by a court of committing bribery, you could face up to 10 years in prison and/or an unlimited fine. The Organisation could also face prosecution and be liable to pay a fine.

C) PURPOSE

The purpose of this policy is to convey to all employees and interested parties of NTIA the rules of the Organisation in relation to our unequivocal stance towards the eradication of bribery and our commitment to ensuring that The NTIA conducts its business in a fair, professional and legal manner.

D) DEFINITIONS OF BRIBERY AND CORRUPTION

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

- Giving or receiving money, gifts, meals, entertainment, or anything else of value.
- As an inducement to a person to do something which is dishonest or illegal.

E) SCOPE

This policy applies to all employees of The NTIA, regardless of seniority or site. It also extends to anyone working for or on our behalf e.g. those engaged by us on a self-employed basis or an agency arrangement.

We will encourage the application of this policy where our business involves the use of third parties e.g. suppliers; contractors.

F) POLICY

It is prohibited, directly or indirectly, to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or organisation in order to gain commercial, contractual or regulatory advantage for the Organisation, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

It is also prohibited to act in the above manner to influence an individual in their capacity as a foreign public official. You should not make a payment to a third party on behalf of a foreign public official.

If you are offered a bribe, or a bribe is solicited from you, you should not agree to it unless your immediate safety is in jeopardy. You should immediately contact Silvana Kill so that action can be taken if considered necessary. You may be asked to give a written account of events.

If you, as an employee or person working on our behalf, suspect that an act of bribery, or attempted bribery, has taken place, even if you are not personally involved, you are expected to report this to Silvana Kill. You may be asked to give a written account of events.

Appropriate checks will be made before engaging with suppliers or other third parties of any kind to reduce the risk of our business partners breaching our anti-bribery rules.

The Organisation will ensure that all its transactions, including any sponsorship or donations given to charity, are made transparently and legitimately.

The NTIA takes any actual or suspected breach of this policy extremely seriously and will carry out a thorough investigation should any instances arise.

We will uphold laws relating to bribery and will take disciplinary action against any employee, or other relevant action against persons working on our behalf or in connection with us, should we find that an act of bribery, or attempted bribery, has taken place. This action may result in your dismissal if you are an employee, or the cessation of our arrangement with you if you are self-employed, an agency worker, contractor etc.

Staff are reminded of the Organisation's Whistleblowing Policy, which is available in the Employee Handbook, or upon request.

G) GIFTS AND HOSPITALITY

We realise that the giving and receiving of gifts and hospitality where nothing is expected in return helps form positive relationships with third parties where it is proportionate and properly recorded. This does not constitute bribery and consequently such actions are not considered a breach of this policy.

Gifts include money; goods (flowers, vouchers, food, drink, event tickets when not used in a hosted business context); services or loans given or received as a mark of friendship or appreciation.

Hospitality includes entertaining; meals or event tickets (when used in a hosted business context) given or received to initiate or develop relations. Hospitality will become a gift if the host is not present.

No gift should be given, nor hospitality offered by an employee or anyone working on our behalf to any party in connection with our business without receiving prior written approval from Silvana Kill. Similarly, no gift nor offer of hospitality should be accepted by an employee or anyone working on our behalf without receiving prior written approval from Silvana Kill.

A record will be made of every instance in which gifts or hospitality are given or received.

As the law is constantly changing, this policy is subject to review and the Organisation reserves the right to amend this policy without prior notice.

Anti-Tax Evasion Policy

A) INTRODUCTION

Tax evasion is a criminal offence. The Organisation prohibits any form of tax evasion. Involvement in the criminal facilitation of tax evasion exposes the Organisation and the person facilitating the evasion to a criminal offence. It will also damage our reputation and the confidence of our customers, suppliers, and business partners.

Indicators of tax evasion are: -

- a) request for payment by cash;
- b) overly-complex payment mechanisms;
- c) services/goods provided to jurisdictions that do not subscribe to Common Reporting Standards;
- d) transactions involving overly complex supply chains;
- e) transactions involving private banking facilities; and/or
- f) records are incomplete or missing.

Our position is simple: we conduct our business to the highest legal and ethical standards. We will not be party to tax evasion or the facilitation of tax evasion of any form. Such acts would damage our reputation and expose us, and our staff and representatives, to the risk of fines and imprisonment.

We take a zero-tolerance approach to tax evasion facilitation by our people and our third party representatives. We are committed to:

- a) rejecting the facilitation of tax evasion; and
- b) not recommending the services of others who do not have reasonable prevention procedures in place.

We require compliance regarding this from everyone connected with our business. Integrity and transparency are of utmost importance to us.

B) DEFINITIONS OF TAX EVASION

Tax evasion is the practice of using illegal methods to avoid paying tax. It frequently involves contrived; artificial transactions that serve no purpose other than to reduce tax liability.

C) POLICY

It is prohibited, directly or indirectly, for any employee or person working on our behalf to take part in any activity relating to tax evasion.

If we suspect that you have taken part in such activity, an investigation will be carried out and, in line with our disciplinary procedure where appropriate, action may be taken against you which may result in your dismissal, or the cessation of our business arrangement with you.

If you, as an employee or person working on our behalf, suspect any activity related to tax evasion or attempted tax evasion has taken place, even if you are not personally involved,

you are expected to report this to Silvana Kill. You may be asked to give a written account of events.

D) TRAINING/MONITORING/REVIEW

The Organisation will ensure that it gives all relevant training for staff in relation to financial crime detection and prevention, it will ensure it monitors and enforces compliance with the prevention procedures and regularly review the effectiveness of prevention procedures, refining them where necessary.

E) CONCERNS

Staff are reminded of the Organisation's Whistleblowing policy, which is available in the Employee Handbook, or upon request.

Whistle-Blowing Procedure

A) INTRODUCTION

Under certain circumstances, employees are protected from suffering any detriment or termination of employment if they make disclosures about organisations for whom they work.

B) QUALIFYING DISCLOSURES

- 1) Certain disclosures are prescribed by law as "qualifying disclosures". A "qualifying disclosure" means a disclosure of information that the employee genuinely and reasonably believes is in the public interest and shows that the Organisation has committed a "relevant failure" by:
 - a) committing a criminal offence;
 - b) failing to comply with a legal obligation;
 - c) a miscarriage of justice;
 - d) endangering the health and safety of an individual;
 - e) environmental damage; or
 - f) concealing any information relating to the above.
- 2) These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. The Organisation will take any concerns that you may raise relating to the above matters very seriously.
- 3) The Employment Rights Act 1996 provides protection for workers who 'blow the whistle' where they reasonably believe that some form of illegality, injustice or breach of health and safety has occurred or is likely to occur. The disclosure must be "in the public interest". We encourage you to use the procedure to raise any such concerns.

C) THE PROCEDURE

- 1) In the first instance you should report any concerns you may have to Silvana Kill who will treat the matter with complete confidence. If you are not satisfied with the explanation or reason given to you, you should raise the matter with the appropriate official organisation or regulatory body.
- 2) If you do not report your concerns to Silvana Kill, Operations Director.

D) TREATMENT BY OTHERS

Bullying, harassment, or any other detrimental treatment afforded to a colleague who has made a qualifying disclosure is unacceptable. Anyone found to have acted in such a manner will be subject to disciplinary action.

Equality & Diversity Policy

A) INTRODUCTION

We are an equal opportunities employer. We are committed to equality of opportunity and to providing a service and following practices which are free from unfair and unlawful discrimination. The aim of this policy is to ensure that no applicant or member of staff receives less favourable treatment on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation, or is disadvantaged by conditions or requirements which cannot be shown to be relevant to performance. It seeks also to ensure that no person is victimised or subjected to any form of bullying or harassment.

The terms equality, inclusion, diversity, and equity are at the heart of this policy. 'Equality' means ensuring everyone has the same opportunities to fulfil their potential free from discrimination. 'Inclusion' means ensuring everyone feels comfortable to be themselves at work and feels the worth of their contribution. 'Diversity' means the celebration of individual differences amongst the workforces. 'Equity' means recognising barriers and that some groups are more advantaged than others, and putting measures in place to eliminate these barriers, ensuring equal opportunities for all. We will actively support diversity, equity and inclusion and ensure that our workforce is valued and treated with dignity and respect. We want to encourage everyone in our business to reach their potential.

We value people as individuals with diverse opinions, cultures, lifestyles, and circumstances. All employees are covered by this policy, and it applies to all areas of employment including recruitment, selection, training, deployment, career development, and promotion. These areas are monitored, and policies and practices are amended if necessary to ensure that no unfair or unlawful discrimination, intentional, unintentional, direct or indirect, overt or latent exists.

The Operations Director has responsibility for implementing and monitoring the Equality and Diversity Policy and, as part of this process, all personnel policies and procedures are administered with the objective of promoting equality of opportunity and eliminating unfair or unlawful discrimination.

All employees, workers, or self-employed contractors whether part time, full time or temporary, will be treated fairly and with respect. Selection for employment, promotion, training, or any other benefit will be based on aptitude and ability. All employees will be

helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the Company.

Equality of opportunity, valuing diversity and compliance with the law is to the benefit of all individuals in our Company as it seeks to develop the skills and abilities of its people. While specific responsibility for eliminating discrimination and providing equality of opportunity lies with managers and supervisors, individuals at all levels have a responsibility to treat others with dignity and respect. The personal commitment of every employee to this policy and application of its principles are essential to eliminate discrimination and provide equality and equity throughout the Company.

B) OUR COMMITMENT AS AN EMPLOYER

- 1) To create an environment in which individual differences and the contributions of our staff are recognised and valued.
- 2) Every employee, worker or self-employed contractor is entitled to a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.
- 3) We will recruit and retain diverse talent by ensuring that diversity and inclusion are central to our recruitment, training, and development practices.
- 4) Training, development, and progression opportunities are available to all staff.
- 5) We recognise that equality and diversity in the workplace is good management practice and makes sound business sense.
- 6) We will take steps to ensure equity amongst our workforce such as ensuring that our vacancies are advertised to a diverse range of potential candidates and, where relevant, to groups that have been identified as disadvantaged or underrepresented in our Company, taking positive action to recruit disabled people, and ensuring there are no unlawful barriers to accessing our employment opportunities, training, progression opportunities, benefits and facilities.
- 7) Diversity in our workforce will be regularly monitored to ensure equal opportunities throughout the Company. Where appropriate, measures will be taken to identify and remove unnecessary obstacles and to meet the special needs of disadvantaged or underrepresented groups.

We will review all our employment practices and procedures to ensure fairness.

C) OUR COMMITMENT AS A SERVICE PROVIDER

- 1) We aim to provide services to which all clients are entitled regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation, offending past, caring responsibilities, or social class.
- 2) We will make sure that our services are delivered equally and meet the diverse needs of our service users and clients.
- 3) We will take steps to ensure equity amongst our clients and service users such as removing any unlawful obstacles to accessing our services or facilities. Where appropriate, measures will be taken to identify and remove unnecessary barriers and to meet the special needs of disadvantaged or underrepresented groups.
- 4) This policy is fully supported by senior management and has been agreed with employee representatives.
- 5) This policy will be monitored and reviewed annually.
- 6) We have clear procedures that enable our clients, candidates for jobs and employees to raise a grievance or make a complaint if they feel they have been unfairly treated.
- 7) Breaches of our Equality and Diversity Policy will be regarded as misconduct and could lead to disciplinary proceedings.

D) POLICY STATEMENTS AGE

We will:

- 1) ensure that people of all ages are treated with respect and dignity;
- 2) ensure that people are given equal access to our employment, training, development, and promotion opportunities; and
- 3) challenge discriminatory assumptions about younger and older people.

DISABILITY

We will:

- 1) provide any reasonable adjustments to ensure disabled people have access to our services and employment opportunities;
- 2) challenge discriminatory assumptions about disabled people; and
- 3) seek to continue to improve access to information by ensuring availability of loop systems, braille facilities, alternative formatting, and sign language interpretation.

RACE

We will:

- 1) challenge racism wherever it occurs;
- 2) respond swiftly and sensitively to racist incidents; and
- 3) actively promote race equality in the Company.

GENDER

We will:

- 1) challenge discriminatory assumptions about gender;
- 2) take positive action to redress the negative effects of discrimination against everyone;
- 3) offer equal access for everyone to representation, services, employment, training and pay and encourage other organisations to do the same; and
- 4) provide support to prevent discrimination against transgender people who have or who are about to undergo gender reassignment.

SEXUAL ORIENTATION

We will:

- 1) ensure that we take account of the needs of everyone, including the LGBTQ+ communities; and
- 2) promote positive images of the LGBTQ+ communities.

RELIGION OR BELIEF

We will:

- 1) ensure that employees' religion or beliefs and related observances are respected and accommodated wherever possible; and
- 2) respect people's beliefs where the expression of those beliefs does not impinge on the legitimate rights of others.

PREGNANCY OR MATERNITY

We will:

- 1) Ensure that people are treated with respect and dignity during pregnancy and during maternity leave;

- 2) challenge discriminatory assumptions about pregnancy and maternity leave; and
- 3) ensure that no individual is disadvantaged as a result of pregnancy or maternity leave and that we take account of the needs of our employees during pregnancy and during maternity leave.

MARRIAGE OR CIVIL PARTNERSHIP

We will:

- 1) Ensure that people are treated with respect and dignity and that a positive image is promoted regardless of marriage or civil partnership;
- 2) challenge discriminatory assumptions about the marriage or civil partnership of our employees; and
- 3) ensure that no individual is disadvantaged because of their marriage or civil partnership status.

EQUAL PAY

We will:

- 1) ensure that all employees have the right to the same contractual pay and benefits for carrying out the same work, work rated as equivalent work or work of equal value.

Personal Harassment Policy and Procedure

A) INTRODUCTION

- 1) Harassment or victimisation on the grounds of the following protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation is unacceptable.
- 2) Personal harassment takes many forms but whatever form it takes, it is unlawful under the Equality Act 2010 and will not be tolerated.
- 3) This policy will be reviewed regularly to ensure it remains up to date and to monitor its effectiveness.

B) SCOPE

We deplore all forms of personal harassment and seek to ensure that the working environment is sympathetic to all those who work for us. This includes employees, workers, agency workers, volunteers, and contractors in all areas of our Company, including any overseas sites.

C) DEFINITIONS

Harassment

This is unwanted conduct related to a relevant protected characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment for that person.

Unwanted conduct can include:

- a) spoken words
- b) banter
- c) written words
- d) posts or contact on social media
- e) imagery

- f) graffiti
- g) physical gestures
- h) facial expressions
- i) mimicry
- j) jokes or pranks
- k) acts affecting a person's surroundings
- l) aggression, and
- m) physical behaviour towards a person or their property.

Sexual harassment

This is unwanted conduct of a sexual nature which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment for that person.

- a) sexual comments or jokes
- b) displaying sexually graphic pictures, posters, or photos
- c) suggestive looks, staring or leering
- d) propositions and sexual advances
- e) making promises in return for sexual favours
- f) sexual gestures
- g) intrusive questions about a person's private or sex life or a person discussing their own sex life
- h) sexual posts or contact on social media
- i) spreading sexual rumours about a person
- j) sending sexually explicit emails or text messages, and
- k) unwelcome touching, hugging, massaging, or kissing.

Less favourable treatment for rejecting or submitting to unwanted conduct

This occurs when:

- a) someone is subjected to unwanted conduct:
 - i) of a sexual nature
 - ii) related to sex, or
 - iii) related to gender reassignment
- b) the unwanted conduct has the purpose or effect of:
 - i) violating their dignity, or
 - ii) creating an intimidating, hostile, degrading, humiliating, or offensive environment for them, and
- c) they are treated less favourably because they submitted to or rejected the unwanted conduct.

D) CIRCUMSTANCES WHICH ARE COVERED

- 1) This policy covers behaviour which occurs in the following situations:
 - a) a work situation
 - b) a situation occurring outside of the normal workplace or normal working hours which is related to work, for example, a working lunch or social event with colleagues;
 - c) outside of a work situation but against a colleague or other person connected to the Company, including on social media;
 - d) against anyone outside of a work situation where the incident is relevant to their suitability to carry out the role.

E) COMPLAINING ABOUT PERSONAL HARASSMENT

1) Informal complaint

We recognise that complaints of personal harassment, and particularly of sexual harassment, can sometimes be of a sensitive or intimate nature and that it may not be appropriate for you to raise the issue through our normal grievance procedure. In these circumstances you are encouraged to raise such issues with a senior colleague of your choice (whether that person has a direct supervisory responsibility for you) as a confidential helper. This person cannot be the same person who will be responsible for investigating the matter if it becomes a formal complaint.

If you are the victim of minor harassment, you should make it clear to the harasser on an informal basis that their behaviour is unwelcome and ask the harasser to stop. If you feel unable to do this verbally then you should hand a written request to the harasser, and your confidential helper can assist you in this.

2) Formal complaint

Where the informal approach fails or if the harassment is more serious, you should bring the matter to the attention of [Senior Manager] as a formal written complaint and again your confidential helper can assist you in this. If possible, you should keep notes of the harassment so that the written complaint can include:

- a) the name of the alleged harasser;
- b) the nature of the alleged harassment;
- c) the dates and times when the alleged harassment occurred;
- d) the names of any witnesses; and
- e) any action already taken by you to stop the alleged harassment.

On receipt of a formal complaint we will take action to separate you from the alleged harasser to enable an uninterrupted investigation to take place. This may involve a temporary transfer of the alleged harasser to another work area or suspension with contractual pay until the matter has been resolved.

The person dealing with the complaint will invite you to attend a meeting, at a reasonable time and location, to discuss the matter and carry out a thorough investigation. You have the right to be accompanied at such a meeting by your confidential helper or another work colleague of your choice and you must take all reasonable steps to attend. Those involved in the investigation will be expected to act in confidence and any breach of confidence will be a disciplinary matter.

On conclusion of the investigation, which will normally be within ten working days of the meeting with you, the decision of the investigator, detailing the findings, will be sent in writing to you.

You have the right to appeal against the findings of the investigator in accordance with the appeal provisions of the grievance procedure.

A) DISCIPLINARY ACTION

1) If the decision is that the allegation is well founded, the harasser will be liable to disciplinary action in accordance with our disciplinary procedure. An employee who receives a formal warning or who is dismissed for harassment may appeal by using our capability/disciplinary appeal procedure.

2) When deciding on the level of disciplinary sanction to be applied, we will take into consideration aggravating factors such as abuse of power over a more junior colleague.

3) If you bring a complaint of harassment, you will not be victimised for having brought the complaint. However, if it is concluded that the complaint is both untrue and has been brought with malicious intent, disciplinary action will be taken against you.

B) THIRD PARTY HARASSMENT

1) Third party harassment occurs when one of our workforces is subjected to harassment by someone who is not part of our workforce but who is encountered in connection with work. This includes our customers, suppliers, members of the public. Third party harassment of our workforce will not be tolerated.

2) In order to prevent third party harassment from occurring, we have:

THE FOLLOWING ARE EXAMPLES - INCLUDE AS PER CLIENT'S INSTRUCTION/INDUSTRY

a) attached signage to the walls of the areas within the workplace where customers are present to warn that harassment of our staff is not acceptable.

Should you be subjected to third party harassment, you are encouraged to report this as soon as possible to Silvana Kill, Operations Director.

Should a customer harass a member of our workforce, they will be warned that continued provision of our service to them will cease if they are to act in a similar way again. Should their behaviour recur, they will be informed that our service to them will cease. Any criminal acts will be reported to the police, and we will share information relating to the incident with our other branches to ensure that we maintain a consistent approach to the cessation of our services.

Environmental Policy

We aim to be an environmentally friendly Company and it is our intention to promote a policy that is focused on being green aware. A culture will be fostered within the Company that ensures all employees understand they can make a significant contribution to the Company being an environmentally friendly and green aware company.

The Company's policy is to comply or exceed the requirements of environmental legislation and regulation.

POLICY

- 1) The specifics of the Company environmental policy are as follows:
- 2) the Company will review and explore measures for the reduction of volumes of all waste materials generated by the Company;
- 3) the Company will explore opportunities for recycling all possible waste materials. Our ultimate aim will be to recycle any waste material that can be recycled;
- 4) the Company will aim to reduce levels of energy consumption. The Company will introduce working practices that requires equipment such as computers, screens, lights, phones, chargers, photocopiers, and printers to be "switched off" when not in use, including during breaks and at the end of the working day. The Company will also ensure that heating, lighting and ventilation are used efficiently and effectively;
- 5) the Company will explore, and implement where possible, energy saving measures;
- 6) the Company will aim to purchase and use energy efficient products, such as energy saving light bulbs, where possible and appropriate;
- 7) the Company will review, and improve where appropriate, the insulation and draught-proofing of its facilities;
- 8) additionally, the Company will explore whether environmentally friendly products can be purchased when buying any equipment for use within the Company;
- 9) the Company will review opportunities and consider implementing measures for the reduction of the use of water;
- 10) the Company will aim to reduce levels of pollution emissions wherever possible;
- 11) the Company will use technology to reduce the need to travel, and encourage staff to use public transport or electric vehicles, where travel is unavoidable;
- 12) the Company will ensure that all employees are made aware and have access to a copy of this environmental policy. The Company will regularly review the policy to ensure that we are a green aware and environmentally friendly organisation.