

HILL PILING

Part I

Health and Safety Policy Manual

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Alcohol and Drugs Policy

The Director, all Managers and Employees of RW Hill Piling Ltd should note that some prescribed and over the counter medication may affect your ability to work, if you are in doubt consult your doctor.

Anyone found under the influence of or in possession of alcohol or an illegal drug will be removed from Company premises and/or areas under the RW Hill Piling Ltd control and would be subjected to disciplinary measures. Anyone found smoking in a designated 'No Smoking' area will be instructed to extinguish the cigarette immediately in a safe manner and be subjected to disciplinary measures. Special consideration will be given to Client conditions and requirements regarding this subject when working on their premises/contracts.

Random drug screening may be carried out on employees engaged on safety critical work, and will be carried out following an incident or accident. If tests prove positive for alcohol or drugs, this would be classified as a breach of the company health and safety policy and would therefore result in disciplinary procedures, which could include dismissal.

The Company will use the standards for a positive test shown below for drugs and alcohol generally. Company Management will check the standards of positive tests with all the RW Hill Piling Ltd Clients and if there are standards for positive tests lower than the figures below, then those lower standards will be adopted by the Company for that particular Client.

Employees will note that it might take more than 24 hours for alcohol in blood to disperse. Employees will carefully consider this aspect, particularly those who are engaged on safety critical work or those employees engaged on Contracts where the RW Hill Piling Ltd Clients specify very low acceptable alcohol levels.

Any Company employee found under the influence, or in possession of illegal drugs whilst at work, will be removed from site immediately and the matter reported to the Police. This type of offence will be classified as a major breach of the company health and safety policy, which would result in the employee being dismissed.

Company Standards

All employees required to work on the RW Hill Piling Ltd premises/contract are required to be formally briefed on the drugs and alcohol policy. Each Employee receiving the standard RW Hill Piling Ltd pack of documentation, which is inclusive of the drugs and alcohol policy, are to receive briefings covering this subject as a part of their induction for the contract works prior to starting work.

Positive screening results

For the purpose of the standards, means screening for:

The presence of drugs, other than medication, which does not affect the work performance.

For the purpose of the standard, means screening for:

- More than 29 milligrams of alcohol in 100 millilitres of blood, or
- More than 13 micrograms of alcohol in 100 millilitres of breath, or
- More than 39 milligrams of alcohol in 100 millilitres of urine.

Alcohol and Drugs Policy - Statement of Intent

The aims of this policy will be achieved by using screening processes, education and information programmes to:

- Detect any person who takes alcohol or drugs either at work or before coming to work.
- Ensure compliance with the relevant legislative arrangements.

Screening will be used in the following circumstances:

Post-Accident/Incident

If following an accident/incident there are reasonable grounds to suspect that the employees actions or omissions contributed to the cause then the employee will be tested for drugs and/or alcohol by the Company (or by the police if they attend) through an approved testing agency. The employee will be suspended from duty, with pay, whilst waiting for the test results.

For Cause (behaviour or appearance)

If a manager or supervisor has reasonable cause to suspect that an employee is unfit for work as a result of drugs and/or alcohol then the employee will:

1. Not be allowed to start their duty or will be relieved immediately if they have commenced a duty.
2. Be tested for alcohol and/or drugs by the company or a recognised agency.
3. Be suspended from duty, with pay, whilst waiting for the results.

To maintain a drug/alcohol free workplace random drug/alcohol screening of employees may take place each year.

All employees may be included in the random selection. If an existing employee's test result is positive, or they refuse to take a test, action will be taken in accordance with the RW Hill Piling Ltd disciplinary procedure. This procedure may result in dismissal.

All drug screening for existing employees will be carried out by the company using a recognised testing process and analysis.

Right of Appeal

If an existing employee's test result is positive they have the right to gain a second independent opinion. The results of both tests will be carefully considered by the relevant

Manager before any further action is taken.

Legal Obligations

The Organisation reserves the right to report to the police any employee that is found to be:

- In possession of drugs
- Trafficking drugs
- Under the influence of drugs

Signed on behalf of RW Hill Piling Ltd.



Howard Sidebottom
Director of Health and Safety.
01/11/2019

Review Date: 31/10/2020

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Anti-Corruption And Bribery Policy

- It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.
- We will uphold all laws relevant to countering bribery and corruption [in all the jurisdictions in which we operate]. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.
- The purpose of this policy is to:
 - set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and
 - provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.
- It is a criminal offence to offer, promise, give, request, or accept a bribe. Individuals found guilty can be punished by up to ten years' imprisonment and/or a fine. As an employer if we fail to prevent bribery we can face an unlimited fine, exclusion from tendering for public contracts, and damage to our reputation. We therefore take our legal responsibilities very seriously
- In this policy, **third party** means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

Who must comply with this policy?

- This policy applies to all persons working for us [or any Group Company] or on our 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 business partners, sponsors, or any other person associated with us, wherever located (collectively referred to as **workers** in this policy).

What are bribery and corruption?

- **Bribery** is offering, promising, giving or accepting any financial or other advantage, to induce the recipient or any other person to act improperly in the performance of their functions, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage.
- An **advantage** includes money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or anything else of value.

- A person acts **improperly** where they act illegally, unethically, or contrary to an expectation of good faith or impartiality, or where they abuse a position of trust. The improper acts may be in relation to any business or professional activities, public functions, acts in the course of employment, or other activities by or on behalf of any organisation of any kind.
- **Corruption** is the abuse of entrusted power or position for private gain.

Examples:**Offering a bribe**

You offer a potential client tickets to a major sporting event, but only if they agree to do business with us.

This would be an offence as you are making the offer to gain a commercial and contractual advantage. We may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the potential client to accept your offer.

Receiving a bribe

A supplier gives your nephew a job, but makes it clear that in return they expect you to use your influence in our organisation to ensure we continue to do business with them.

It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

Bribing a foreign official

You arrange for the business to pay an additional payment to a foreign official to speed up an administrative process[, such as clearing our goods through customs].

The offence of bribing a foreign public official has been committed as soon as the offer is made. This is because it is made to gain a business advantage for us. We may also be found to have committed an offence.

What you must not do

- It is not acceptable for you (or someone on your behalf) to:
- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- give or accept a gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome;
- accept hospitality from a third party that is unduly lavish or extravagant under the circumstances.
- accept a payment, gift or hospitality from a third party that you know or suspect is offered with the expectation that it we will provide a business advantage for them or anyone else in return;

- offer or accept a gift to or from government officials or representatives, or politicians or political parties], without the prior approval of [your manager OR the compliance manager];
- threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy.

What is not acceptable?

- It is not acceptable for you (or someone on your behalf) to:
- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy.

Facilitation payments and kickbacks

- 1.13 We do not make, and will not accept, facilitation payments or "kickbacks" of any kind.
- **Facilitation payments**, also known as "back-handers" or "grease payments", are typically small, unofficial payments made to secure or expedite a routine or necessary action (for example by a government official). They are not common in the UK, but are common in some other jurisdictions [in which we operate].
- **Kickbacks** are typically payments made in return for a business favour or advantage.
- All workers must avoid any activity that might lead to a facilitation payment or kickback being made or accepted by us or on our behalf, or that might suggest that such a payment will be made or accepted. If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with the compliance manager.

Donations

- We do not make contributions to political parties. We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the compliance manager.

Gifts, hospitality and expenses

- This policy allows reasonable and appropriate hospitality or entertainment given to or received from third parties, for the purposes of:
 - establishing or maintaining good business relationships;
 - improving or maintaining our image or reputation; or
 - marketing or presenting our products and/or services effectively.
- The giving and accepting of gifts is allowed if the following requirements are met:
 - It is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
 - it is given in our name, not in your name;
 - it does not include cash or a cash equivalent (such as gift certificates or vouchers);
 - it is appropriate in the circumstances, taking account of the reason for the gift, its timing and value. For example, in the UK it is customary for small gifts to be given at Christmas; and
 - it is given openly, not secretly;
- it complies with any applicable local law.
- Promotional gifts of low value such as branded stationery to or from existing customers, suppliers and business partners will usually be acceptable.
- Reimbursing a third party's expenses, or accepting an offer to reimburse our expenses (for example, the costs of attending a business meeting) would not usually amount to bribery. However, a payment in excess of genuine and reasonable business expenses (such as the cost of an extended hotel stay) is not acceptable.
- We appreciate that practice varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift, hospitality or payment is reasonable and justifiable. The intention behind it should always be considered.

Potential risk scenarios: "red flags"

- The following is a list of possible red flags that may arise during the course of you working for us and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

If you encounter any of these red flags while working for us, you must report them promptly to the compliance manager:

1. you become aware that a third party engages in, or has been accused of engaging in, improper business practices;
2. you learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials;
3. a third party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us;
4. a third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
5. a third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business;
6. a third party requests an unexpected additional fee or commission to "facilitate" a service;
7. a third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
8. a third party requests that a payment is made to "overlook" potential legal violations;
9. a third party requests that you provide employment or some other advantage to a friend or relative;
10. you receive an invoice from a third party that appears to be non-standard or customised;
11. a third party insists on the use of side letters or refuses to put terms agreed in writing;
12. you notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided;
13. a third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us;
14. you are offered an unusually generous gift or offered lavish hospitality by a third party; or

Your responsibilities

- You must ensure that you read, understand and comply with this policy.
- The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

- You must notify the compliance manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage with us, or indicates to you that a gift or payment is required to secure their business. Further "red flags" that may indicate bribery or corruption are set out in paragraph 9.24.
- Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. [We reserve our right to terminate our contractual relationship with other workers if they breach this policy.]

Record-keeping

- We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.
- You must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.
- You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.
- All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept 'off-book' to facilitate or conceal improper payments.

How to raise a concern

- You are encouraged to raise concerns about any issue or suspicion of bribery or corruption at the earliest possible stage.
- If you are offered a bribe, or are asked to make one, or if you believe or suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must [notify your manager or [POSITION]] as soon as possible.
- If you are unsure about whether a particular act constitutes bribery or corruption, raise it with your manager.

Protection

- Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim 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.

- We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

Training and communication

- Training on this policy forms part of the induction process for all new workers. All existing workers will receive regular, relevant training on how to implement and adhere to this policy.
- Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

Signed on behalf of RW Hill Piling Ltd.



Howard Sidebottom
Director of Health and Safety.
01/11/2019

Review Date: 31/10/2020

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Bribery, Fraud & Malpractice Policy

RW Hill Piling Ltd Bribery, Fraud and Malpractice Policy is in line with The Bribery Act 2010 which is an Act of the Parliament of the United Kingdom that covers the criminal law relating to bribery.

Fraud

RW Hill Piling Ltd requires all staff at all times to act honestly and with integrity and to safeguard the resources for which they are responsible. Fraud is an ever-present threat to these resources and hence must be a concern to all members of staff. The purpose of this policy is to set out responsibilities with regard to the prevention of fraud.

What is Fraud?

No precise legal definition of fraud exists; many of the offences referred to as fraud are covered by the Theft (Amended) Act 1996 and the Forgery & Counterfeiting Act 1981. The term is used to describe such acts as theft, deception, bribery, forgery, corruption, false accounting and conspiracy to commit these offences. For practical purposes, fraud may be defined as the use of deception with the intention of obtaining an advantage, avoiding an obligation or causing loss to another party.

RW Hill Piling Ltd should be responsible for:

- Developing and maintaining effective controls to prevent fraud
- Carrying out vigorous and prompt investigations if fraud occurs
- Taking appropriate legal and/or disciplinary action against perpetrators of fraud
- Taking disciplinary action against supervisors where supervisory failures have contributed to the commission of fraud

Management should be responsible for:

- Identifying the risks to which systems and procedures are exposed
- Developing and maintaining effective controls to prevent and detect fraud
- Ensuring that controls are being complied with

Individual members of staff are responsible for:

- Acting with propriety in the use of official resources and in the handling and use of corporate funds whether they are involved with cash or payments systems, receipts or dealing with contractors or suppliers.
- Reporting details immediately to their line manager or next most senior manager if they suspect that a fraud has been committed or see any suspicious acts or events.

Bribery

RW Hill Piling Ltd expects its employees to demonstrate honesty, integrity and fairness in all aspects of their business dealings and exercise appropriate standards of professionalism and ethical conduct in all their activities. RW Hill Piling Ltd expects the same approach to doing business from its business partners and suppliers.

Pursuant to this RW Hill Piling Ltd will not tolerate bribery or corruption in any form and has a 'zero tolerance' approach to any breach of this policy.

This means that RW Hill Piling Ltd and its employees will never seek, accept or give a bribe, facilitation payment, kickback or other improper payment. We must also always ensure that we operate with appropriate transparency in all our business dealings.

RW Hill Piling Ltd will take appropriate steps to ensure that:

- We do not, directly or indirectly, offer, promise, give, accept or demand a bribe or other undue advantage (including excessive gifts and hospitality) in order to obtain or retain business, or gain any other improper advantage.
- We do not offer, nor give in to demands, to make illicit or illegal payments to agents, public officials (at whatever level), or the employees of business partners or anybody else that we do business with.
- We engage and remunerate agents and other third parties only for legitimate services and adopt appropriate transparency in our approach.
- We promote employee awareness of, and compliance with, company policies against bribery and corruption through appropriate dissemination of our own procedures (including disciplinary procedures) policies and training programmes on induction and subsequently.
- We adopt management control systems that discourage bribery and corruption, and adopt financial and tax accounting and auditing practices that prevent the establishment of "off the books" secret accounts or the creation of documents which do not properly and fairly record the transactions to which they relate.
- We do not make illegal or inappropriate contributions to candidates for public office or to political parties or to other political organisations.
- We raise awareness of the need to combat bribery and corruption with our business partners by publication of this Policy and (where appropriate) relevant contractual provisions and support initiatives designed to reduce the risk of bribery and corruption.

This policy will be reviewed annually but we will continually endeavour to improve our practices

Signed on behalf of RW Hill Piling Ltd.



Howard Sidebottom
Director of Health and Safety.
01/11/2019

Review Date: 31/10/2020

Corporate Social Responsibility (CSR) Policy

RW Hill Piling Ltd recognise that we must integrate our business values and operations to meet the expectations of our stakeholders. They include customers, employees, investors, suppliers, the community and the environment.

- RW Hill Piling Ltd recognise that our social, economic and environmental responsibilities to these stakeholders are integral to our business. We aim to demonstrate these responsibilities through our actions and within our corporate policies.
- RW Hill Piling Ltd takes seriously all feedback that we receive from our stakeholders and, where possible, maintain open dialogue to ensure that we fulfil the requirements outlined within this policy.
- RW Hill Piling Ltd shall be open and honest in communicating our strategies, targets, performance and governance to our stakeholders in our continual commitment to sustainable development.
- The Managing Director will be responsible for the implementation of this policy, and will make the necessary resources available to realise our corporate responsibilities. The responsibility for our performance on this policy rests with all employees throughout the company.

RW Hill Piling Ltd shall:

- Ensure a high level of business performance, while minimising and effectively managing risk ensuring that we uphold the values of honesty, partnership and fairness in our relationships with all our stakeholders.
- Support the development of our external stakeholders, through using our facilities for all of our business partners to hold seminars and industry meetings.
- Ensure contracts are clearly set out the agreed terms, conditions and the basis of our relationship, and will operate in a way that safeguards against unfair business practices.
- Encourage suppliers and contractors to adopt responsible business policies and practices.
- Encourage dialogue with local communities for mutual benefit.
- Register and resolve customer complaints in accordance with our standards of service.
- Support and encourage our employees to help local community organisations, and activities in our region, particularly our employee chosen charities.
- Operate an equal opportunities policy for all present and potential future employees, and will offer our employees clear and fair terms of employment and provide resources to enable their continual development.
- Maintain a clear and fair employee remuneration policy, and shall maintain forums for employee consultation and business involvement.
- Provide safeguards to ensure that all employees of whatever nationality, colour, race or religious belief are treated with respect and without sexual, physical or mental harassment.
- Provide, and strive to maintain, a clean, healthy and safe working environment in line with our Health and Safety policy and safe systems of work
- Develop Environmental policies and objectives as part of the business planning cycle.

Signed on behalf of RW Hill Piling Ltd.



Howard Sidebottom
Director of Health and Safety.
01/11/2019

Review Date: 31/10/2020

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Any manager responsible for overseeing construction and maintenance work, whether carried out by staff or contractors, must check that the equipment meets the suitability criteria in Section 5. They must also ensure that services diagrams are shared and that safe systems of work are employed by those at risk of striking hidden services buried in walls, floors or external surfaces. Furthermore, any exterior overhead lines must be highlighted to the supervisor of the work, and taken into account within working arrangements, if there is any possibility that equipment may strike them.

All managers are responsible for ensuring that electrical equipment used by their teams is suitable for its purpose, is registered on the asset register held in the office that it is withdrawn from use if damaged, made available for electrical testing when requested and only repaired by competent authorised persons.

Managers must ensure that risk assessments are undertaken for the work carried out by their staff, and that those assessments take into account any electrical hazards. Where staff complete electrical work as part of their job, this must be undertaken in accordance with a written safe system of work specific to the task at hand.

4. Employee responsibilities

No employee may work on electrical equipment or carry out repairs unless they are qualified for the type of work and have been specifically authorised to do so.

All employees must check the lead of any portable item before it is plugged in and be alert to any equipment which may have become damaged. Damaged equipment must be taken out of use immediately, labelled to indicate that it must not be used, locked away out of use if possible and reported to Howard Sidebottom and the office.

5. Suitability of equipment

Portable electrical equipment used externally must be either battery powered, pneumatic or 110 volt or less, i.e. used with a transformer. Extension leads must be located after any transformer to avoid long lengths of cable operating at 240 volts.

Exception: in dry conditions, when it is not practicable to follow the above policy, 240 volt equipment may be used, provided that a residual current device is fitted to the circuit or at the socket.

Internal construction and maintenance work should also be carried out using reduced voltage, battery or pneumatic equipment where reasonably practicable, and otherwise may be undertaken with 240 volt tools, subject to there being only dry non-conductive conditions and provided that RCD protection is fitted to the circuit or at the socket.

Electrical equipment which is installed out of doors will have an appropriate rating against dust and water ingress (IP rating).

6. Inspection and testing

It is Company policy that a certificate will be obtained confirming that any new installation work and alterations comply with BS 7671.

Installations will be subject to an annual visual inspection as well as a periodic inspection and test every 3-5 years, recommendations for improvement arising from such inspections will be implemented as necessary for safety.

Visual inspection and testing of portable appliances will be undertaken in accordance with a schedule which takes into account the risk of damage to equipment when it is in use. In devising a schedule, HSE guidance will be followed on the topic <http://www.hse.gov.uk/pubns/books/hsg107.htm>. Equipment will be labelled to show that it has been inspected and showing when the next one is due.

Signed on behalf of RW Hill Piling Ltd.



Howard Sidebottom
Director of Health and Safety.
01/11/2019

Review Date: 31/10/2020

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Environmental Policy Statement

RW Hill Piling Ltd (the organisation) is a professional and environmentally conscious organisation, which acknowledges the impact that our operations may potentially have on the environment.

Howard Sidebottom has overall responsibility for all environmental matters. The implementation of this policy and the associated procedures will be monitored and reviewed to ensure progress is made against environmental objectives and targets on a regular basis to ensure that they remain current and applicable to the company's activities. This policy has been endorsed by the RW Hill Piling Ltd Board of Directors, which gives its full support to its implementation.

It is the clear objective of the organisation is to minimise any impact on the environment, this will be achieved by:

- The appointment of Howard Sidebottom to act as the organisations responsible person on environmental incidents and issues.
- The appointment of AM Specialists Group Ltd to assist Howard Sidebottom, by providing advice, assistance and guidance as required.
- The organisation will provide duties and responsibilities to cover all levels of management and ensure understanding and compliance of the policy.
- Take all practical steps to ensure that identified environmental hazards and risks have suitable and effective preventive and control measures implemented.
- A commitment to preventing pollution, reducing waste and ensuring, wherever practicable, that measures are implemented to protect and preserve natural habitats, flora and fauna.
- To continuously improve our policies and systems where possible.
- Consider the effects that our operations may have on the local community and environment.
- Taking action to eliminate or reduce, as far as practicable, any potentially adverse environmental impacts.
- Promoting environmental awareness amongst our staff, suppliers, contractors and partners by implementation of operational procedures.
- Ensuring effective and expedient incident control, investigation and reporting.
- Providing the clearest communication of this policy to all employees, suppliers, contractors, partners and all other interested parties including the public if requested.

It is the responsibility of all duty holders to ensure the full implementation of this policy and ensure that environmental issues are given adequate consideration (both financial and resources) in the planning and day-to-day supervision of all work. To allow for this, all employees will be provided with the necessary resources, equipment, information, instruction and training to fulfil the requirements of this policy.

The organisation will fully comply with the duties placed upon it within the requirements of Environmental legislation, whilst at all times complying with, the requirements and duties set out within Approved Guidance as issued by the Environment Agency and other organisations.

As part of the organisations commitment to continual improvement and maintaining the highest levels of environmental management, it is the intention that the company will work towards environmental management systems compliant with ISO 14001.

All employees and contractors working on behalf of the organisation are expected to co-operate and assist in the implementation of this policy, whilst ensuring that their own works, so far as is reasonably practicable, are carried out without risk to themselves, others or the environment. This includes co-operating with management on any environment related matter.

This environmental policy, all duties and responsibilities under the policy and all objectives will be reviewed annually; the review team will be led by Howard Sidebottom with the assistance of AM Specialists Group Ltd. The team will provide a report with recommendations and any action plans back to the Board of Directors for final review, implementation and authorisation to publish.

Protection is the responsibility of everyone; therefore every member of staff within the organisation will be encouraged to be actively involved in Environmental issues. Communication is key to the effectiveness of the policy and all staff will be consulted on this policy and the business Environmental objectives and encouraged participate in enforcement.

Signed on behalf of RW Hill Piling Ltd.



Howard Sidebottom
Responsible person for the Environmental Issues.
01/11/2019

Review Date: 31/10/2020

Equal Opportunities and Diversity

This policy is designed to prevent discrimination and to attract the best employees. To ensure that diversity is embedded in Company culture reflected in our staff and to better serve our customers/clients, the company will endeavour to:

- Attract applications from all sections of society irrespective of race, gender, marital / civil partnership status, age, disability, religion or belief, colour, national origin or sexual orientation and ensure fair treatment throughout the recruitment process;
- Improve performance within any role, develop skills and prepare all individuals for other roles and responsibilities through effective appraisal and training procedures;
- Ensure that employment decisions are based on business needs and the individual's ability to undertake the role;
- Enhance decision-making and innovation by encouraging interaction and involvement;
- Increase the company's ability to relate to existing and potential customers / clients wherever they exist;
- Identify the various behaviours and barriers that discrimination can take, and understand the negative effect these can have on the company and its employees and customers / clients;
- Provide training for managers and employees involved in key decision-making areas on the potentially discriminatory effects of imposing practices, conditions, and criteria on minority groups, and the importance of being able to justify decisions;
- Monitor the application of this policy, and work towards eliminating any discriminatory practices which may be limiting the company's ability to achieve its objectives.

This policy covers all employees, contractors, temporary workers and job applicants including any individuals working on company premises via a third party. It applies to all aspects of employment, from recruitment and selection through to termination of employment.

To be successful, this Policy will be implemented throughout the company and therefore commitment is required from the whole workforce. The Director and Senior management have the responsibility for ensuring that this policy underpins all aspects of company policy and for promoting an organisational culture that is supportive of the benefits of diversity.

Junior / line managers will have an important role in ensuring that policies and procedures relating to diversity are implemented and communicated to all existing staff and new staff on their commencement. This will be achieved through induction training. Managers will promote a professional and positive work environment by ensuring that this policy is put into practice by challenging behaviour, actions or decisions that breach the policy.

All individual employees have a responsibility to comply with this policy and to be aware of the various behaviours and barriers that discrimination can take, and to understand the negative impact these can have on the company and colleagues. All employees will co-operate with management in the elimination of any discriminatory practices which may be identified and any instances of apparent discrimination will be reported immediately to a line manager.

Unlawful Discrimination

All managers at all levels must understand that it is unlawful to discriminate against people at work on the grounds of their: sex, sexual orientation, status as a married person/civil partner, race, colour, age, nationality, ethnic origin, religion, political or other beliefs, because of a disability, pregnancy, childbirth, maternity leave, are a member or non-member of a trade union.

It is also unlawful to discriminate against part-time or home workers. The company will comply with all relevant legislation and no individual will be unjustifiably discriminated against.

Age

The company is fully committed to promoting age diversity. In valuing the contribution of its employees, regardless of age, the company will seek to eliminate age 'stereotyping' and discrimination on the basis of age. The underlying premise of this is that employees will be assessed on the basis of their skills, ability and potential, not their age. This means that employment opportunities and personal/career development will be available, irrespective of a person's age. This will involve:

- basing employment decisions on objective, job-related criteria;
- encouraging staff of all ages to develop their careers;
- ensuring that staff of all age groups participate in training, and have the chance to improve their skills and experience;
- avoiding assumptions about the physical abilities and career intentions of older job applicants or employees.

The Employment Equality (Age) Regulations 2006 covers people of all ages. It is unlawful to discriminate against young workers as well as against older workers. There is no statutory upper age limit on the right to claim unfair dismissal or to receive redundancy payments. The default retirement age is 65, making compulsory retirement below 65 unlawful unless objectively justified. In addition, all employees have the right to request to work beyond 65 (or any other retirement age set by the company) and the company will give such requests consideration.

Equal pay

Men and women doing equal work and work rated as of equal value are entitled to equal pay.

Race, religion or belief

The company recognises it's unlawful to discriminate against a job-seeker, worker or trainee on the grounds of race, colour, nationality and ethnic or national origins or because of their religion or belief or lack of religion or belief. The company is sensitive to the cultural and religious needs of employees and makes provision to accommodate any formal requests that are made.

Disability

The company recognises its responsibility towards disabled employees and seeks to eliminate unjustified discrimination on the grounds of disability by:

- Recognising the wealth of talent and skill possessed by disabled people;
- Interviewing all disabled job applicants who meet the minimum selection criteria for a job vacancy and consider them on their abilities;
- Ensuring that all disabled employees are smoothly and effectively inducted into the company;
- Identifying and providing any 'reasonable adjustments' to working arrangements or the working environment necessary for the effective performance of their job;
- Making every effort to retain employees who become disabled whilst in the employment of the company.

Monitoring

The company will maintain records of the age, race, gender, marital/civil partnership status, and disability of job applicants and existing employees. Any patterns of under representation (for example, where one gender or race appears to have a consistently reduced chance of promotion) will be fully investigated and any discriminatory practices identified and eliminated.

Bullying and Harassment

All staff will expect to be treated with dignity and respect whilst at work, and have an equal responsibility to treat their colleagues similarly.

The company is committed to creating a harmonious working environment which is free from harassment, including discrimination, victimisation and bullying, and which protects the dignity of female and male employees irrespective of their race, religion or belief, colour, age, national origin, disability or sexual orientation. Harassment is offensive and prejudicial to a productive working environment. It is indicative of a lack of respect for the person harassed, undermines his or her position and may have a negative impact upon health, job performance and sense of personal security.

Grievances

Any employee who feels they have not been treated in accordance with this policy will make a complaint using the company's Grievance Procedure. All complaints will be dealt with seriously, promptly and confidentially. If a member of staff is found to have breached the Diversity Policy they may be subject to disciplinary action under the company's Disciplinary Procedure, which could result in dismissal.

Equal Opportunities - Statement of Intent

RW Hill Piling Ltd believes that diversity is a positive asset and values the contribution made by all members of society. We believe that equality of opportunity has a positive impact on people lives and that it has an important role to play in addressing discrimination, disadvantage and social exclusion in society.

RW Hill Piling Ltd is committed to equality of opportunity both in our work as a provider of professional advocacy and empowerment services and as a responsible and ethical employer.

RW Hill Piling Ltd will not discriminate against anyone applying to work with us, wishing to receive a service from us or applying to become a trustee or volunteer because of any of the following:

- Their race, ethnic origin, or colour,
- Their age, disability, or experience of mental ill health,
- Their religion or creed,
- Their sexual orientation or gender,
- Their marital, parental or carer status,
- Their employment status, financial status or criminal record,
- Their health including their HIV status or any other irrelevant distinction

RW Hill Piling Ltd recognises the need to continuously develop and review our employment and service delivery policies, procedures and processes to ensure decisions are made on the basis of competency, performance, need or ability as appropriate and are not inadvertently discriminatory.

Specific responsibilities for ensuring equality of opportunity fall upon managers, those supervising staff and individuals involved in recruitment and employee administration.

We expect all our staff to promote equality in the workplace and in the services we deliver and to work with us in ensuring fairness towards colleagues and the community we serve.

We are committed to playing our part in the development of a society in which everyone is treated with respect and dignity and their rights are upheld.

Signed on behalf of RW Hill Piling Ltd.



Howard Sidebottom
Director of Health and Safety.
01/11/2019

Review Date: 31/10/2020

Ethical and Sustainable Procurement Policy

Conducting our business in an ethical and sustainable way is fundamental to RW Hill Piling Ltd, and our Code of Ethics sets out individual and collective responsibilities in respect of this.

This Ethical and Sustainable Procurement Policy, which applies to all purchases of goods and services, sets out how we will conduct business with our suppliers and describes the expectations we have of our suppliers regarding the way they conduct their business.

Our aim is to ensure that the way business is conducted throughout the whole of our supply chain conforms to our own standards and is legally compliant.

A reputation for integrity has been a cornerstone of our business. We strive to maintain the highest standards of ethical conduct and corporate responsibility worldwide and seek to influence our suppliers to operate to similar high standards as ourselves.

Sustainable Procurement

Sustainability is a key element of our strategy for the future growth of our business and in our long term vision we have set out our direction and aspirations to become a more sustainable business in the future. We are committed to the principles of sustainable development and aim to encourage our suppliers to adopt the values of sustainability which we uphold.

Procedures

We will:

- Expect all our employees and those doing business on RW Hill Piling Ltd's behalf, including our agents, distributors, joint venture partners, consultants and other third party intermediaries to adhere to the principles in our Code of Ethics
- Select and treat our suppliers fairly and objectively at all times
- Pay suppliers in accordance with the agreed terms and deal with exceptions in a timely manner
- Ensure an ethical basis to business practice
- Seek to ensure that our suppliers' sustainability credentials are considered in our supplier appraisal process and that, where appropriate, sustainability criteria are used in the award of contracts
- Work with our suppliers to eliminate enslaved labour or human trafficking if we find evidence of this practice, (reporting this to the relevant authorities where appropriate); and if the use of enslaved labour or human trafficking cannot be eliminated, we will not continue relationships with these organisations
- Seek to ensure that key suppliers understand and comply with this Ethical and Sustainable Procurement Policy

We expect our suppliers to:

- Conduct business without the payment or receipt of inducements, unlawful incentives or other benefits that might be considered an attempt to influence decision makers
- Respect fundamental human rights, including worker representation
- Treat employees fairly, never abuse or threaten them and never use forced, bonded or child labour
- Maintain a safe working environment at all times and provide access to protective equipment and safety training for all employees
- Maintain effective policies, processes and procedures to manage their environmental impact and to operate their business in a sustainable way

- Comply with all applicable local, national, regional and international laws, regulations and directives at all times
- Respect the intellectual property rights of others

Key controls

Group and divisional supplier surveys, audits and supplier site visits at a level of detail and on a frequency that is reasonably practicable and proportionate and is based upon a risk based approach.

Signed on behalf of RW Hill Piling Ltd.



Howard Sidebottom
Director of Health and Safety.
01/11/2019

Review Date: 31/10/2020

Ethics Policy Statement

It is the policy of RW Hill Piling Ltd to operate an Ethical Management system designed to ensure that the company conducts its business in an ethical manner which not only meets the requirements of the law but also maintains the highest standards of morality and honesty in the pursuit of its everyday business activities.

The company fully recognises and understands its obligations to carry out its business affairs in an ethical manner and has appointed the Managing Director, Howard Sidebottom, as being the person within the organisation who has the overall responsibility for all matters relating to the ethics of the company. Individual departmental managers are responsible for ensuring that the company ethics policy is upheld on a day to day basis.

Whilst the Director and Managers of RW Hill Piling Ltd will do all that is within their power to ensure the company maintains ethical business practices, it is recognised that it is the responsibility of each and every individual member of staff to act in an ethical and honest manner. It is the duty of each employee to ensure that they follow these high standards of honesty and integrity and to report any situation which they consider may impinge on the ethical behaviour of the company.

The management of RW Hill Piling Ltd will provide all employees with any training that may be necessary to carry out their tasks honestly and ethically. However, if an employee is unsure how to perform a certain task or feels it would be detrimental to the ethics of the company to perform a specific job then it is the employee's duty to report his concerns to a supervisor, manager or director.

Whilst it is accepted that in pursuit of their day to day business some staff members may be treated to or may extend hospitality to clients or suppliers, these should only be of a modest cost and nature. Giving to, or accepting gifts from suppliers and clients, other than those such as calendars, diaries pens etc which carry corporate identification is expressly forbidden.

RW Hill Piling Ltd will not place business with any particular supplier nor exclude any other from providing goods or services on the grounds of favouritism or preference based on any consideration other than good value, service and a proven ability to meet its high standards and specifications.

RW Hill Piling Ltd Ethical policy will be continuously monitored and updated as and when changes in the scale and nature of our operations occur. The policy will be reviewed and updated at least annually

Signed on behalf of RW Hill Piling Ltd.



Howard Sidebottom
Director of Health and Safety.
01/11/2019

Review Date: 31/10/2020

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Health and Safety Policy: Statement of Intent

This written Policy Statement as required by Section 2(3) of The Health and Safety at Work etc. Act 1974 and Regulation 5(2) of The Management of Health and Safety at Work Regulations 1999 applies to all RW Hill Piling Ltd (the organisation) employees and premises; this includes but is not limited to the employees of Contractors, Sub-Contractors, Self Employed Persons, Clients and Consultants working on behalf of the organisation.

Howard Sidebottom has been appointed by the organisation to have overall responsibility for all health and safety matters. The implementation of this policy and the associated procedures will be monitored and reviewed to ensure progress is made against health and safety objectives and targets on a regular basis to ensure that they remain current and applicable to the organisation's activities. This review will be carried out by the organisation or our external consultants AM Specialists Group Ltd.

Howard Sidebottom and the Senior Management of the organisation has following consultation with their external consultants AM Specialists Group Ltd, ensured that this policy is appropriate to the nature and scale of the organisation's occupational health and safety risk.

This policy has been endorsed by the Board of Directors, which gives its full support to its implementation.

It is the policy of the organisation to have clear communication and commitment to provide high standards of health, safety and welfare at work and to prevent, so far as is reasonably practicable, accidental loss that may result in:

- Personal Injury.
- Ill Health.
- Damage to plant and property.

The Company objective is to achieve this with a commitment, so far as is reasonable practicable, to:

- The appointment of Howard Sidebottom to act as the organisations responsible person on health and safety incidents and issues.
- The appointment of AM Specialists Group Ltd to assist Howard Sidebottom, by providing advice, assistance and guidance as required.
- The organisation will provide duties and responsibilities to cover all levels of management and ensure understanding and compliance of the policy.
- Providing equipment and methods of work that are safe and without risk to health.
- Providing safe systems of work to be followed to ensure work is carried out without significant risks to the health or safety of employees.
- Ensuring that the arrangements for the use, storage, transport of articles and substances used at work are adequate.
- Providing information, instruction, training and supervision as necessary to ensure health and safety at work.
- Providing a safe place of work, with adequate welfare facilities that are maintained in an efficient manner.
- Ensuring the policy is communicated or displayed within all areas, including remote locations.
- Setting up emergency procedures.
- Providing sufficient resources and allocation of funds to effectively implement this policy.
- Regularly reviewing and planning for health and safety performance, and setting health and safety objectives and targets aimed at improving the organisations health and safety performance.
- Seeking to continually improve company and management systems, operating practices and cultures in all areas that may lead to improved safety performance.

The Senior Management of the organisation is charged with the commitment, application and promotion of this Policy and to ensure that the organisation complies with statutory health and safety legislation, associated Approved Codes of Practice, other Codes of Practice and it's duties in common law.

While the organisation accepts its responsibilities towards health and safety it is expected that Contractors, Sub-Contractors, Self Employed Persons, Clients and Consultants fulfil and comply with their legal requirements under Section 7 and 8 of *The Health and Safety at Work etc. Act 1974* e.g. take reasonable care for their own health and safety and that of others that may be affected by their acts and omissions, to co-operate with management on matters of health and safety and do not interfere with or misuse anything provided in the interests of health and safety.

This health and safety policy, all duties and responsibilities under the policy and all objectives will be reviewed annually; the review team will be led by Howard Sidebottom with the assistance of AM Specialists Group Ltd. The team will provide a report with recommendations and an action plan back to the Board of Directors for final review, implementation and authorisation to publish.

The organisation will aim to secure continuous improvement in health and safety management by establishing challenging health and safety objectives both for the organisation and for its managers, and monitoring progress against those objectives. Individual health and safety objectives will not be compromised for other business objectives;

This Policy is intended to demonstrate that appropriate measures have been determined and applied and is available to all interested parties upon request.

Health and safety is the responsibility of everyone; therefore every member of staff within the organisation will be encouraged to be actively involved in the improvement of health and safety issues. Communication is key to the effectiveness of the policy and all staff will be consulted on this policy and the business health and safety objectives and encouraged to participate in enforcement.

Signed on behalf of RW Hill Piling Ltd.



Howard Sidebottom
Director of Health and Safety,
01/11/2019

Review Date: 31/10/2020

Modern Slavery and Human Trafficking Policy

RW Hill Piling Ltd is committed to eliminating acts of modern day slavery and human trafficking within its core business practices as well as from within our supply chains, including sub-contractors, and suppliers.

The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation. These as well as the suppliers of services make up the supply chain within RW Hill Piling Ltd .

Howard Sidebottom has been appointed by RW Hill Piling Ltd to have overall responsibility for the implementation of this policy and the associated procedures. This policy will be monitored and reviewed to ensure progress is made against organisational objectives and targets on a regular basis to ensure that they remain current and applicable to the company's activities. This review will be carried out by the organisations external consultants AM Specialists Group Ltd.

As part of the companies due diligence processes into slavery and human trafficking the supplier approval process will incorporate a review of the controls undertaken by the supplier. Imported goods from sources from outside the UK and EU are potentially more at risk for slavery/human trafficking issues.

The level of management control required for these sources will be continually monitored. The company will not support or deal with any business knowingly involved in slavery or human trafficking.

The company Directors and management team (under the direction of Howard Sidebottom) shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources (training, etc) and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains.

A full copy of this policy and a copy of the Modern Slavery Act 2015 will be accessible to all employees electronically and can be obtained from the company management upon request. This policy statement will be reviewed annually and published.

The implementation and operation of the company's existing management system underlines our commitment to this policy. Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels within the company.

Signed on behalf of RW Hill Piling Ltd.



Howard Sidebottom
Director of Health and Safety
01/11/2019

Review Date: 31/10/2020

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Occupational Health Management Policy

RW Hill Piling Ltd is committed to the general provisions of occupational health care. Occupational health is about the effect of work on health and about making sure that RW Hill Piling Ltd employees are fit for the work that they do. It's about prevention rather than cure, and about rehabilitating of the workforce after illness. The organisation will ensure this policy by providing:

Howard Sidebottom has been appointed by the organisation to have overall responsibility for all occupational health matters. The implementation of this policy and the associated procedures will be monitored and reviewed to ensure progress is made against occupation health objectives and targets on a regular basis to ensure that they remain current and applicable to the organisation's activities. This review will be carried out by the organisations external consultants AM Specialists Group Ltd.

Howard Sidebottom and the Senior Management of the organisation has following consultation with their external consultants AM Specialists Group Ltd, ensured that this policy is appropriate to the nature and scale of the organisation's occupational health risk.

This policy has been endorsed by the Board of Directors, which gives its full support to its implementation.

- The appointment of Howard Sidebottom to act as the organisations responsible person on occupation health issues.
- The appointment of AM Specialists Group Ltd to assist Howard Sidebottom, by providing advice, assistance and guidance as required.
- The organisation will provide duties and responsibilities to cover all levels of management and ensure understanding and compliance of the policy.
- Advice and guidance to management in relation to the health and welfare of employees.
- The provision of health monitoring, health surveillance and relevant records as required by the The Control of Substances Hazardous to Health Regulations (CoSHH) 2002 (as amended), Chemical Hazard Information Packaging Regulations 2004 and The Regulatory Reform (Fire Safety) Order 2005.
- The provision for the care and rehabilitation of staff suffering from mental health disorders.
- Controls for the monitoring of extreme temperatures while at work.
- Controls and assessments for tasks and processes involving manual handling.
- Controls and systems for personnel involved in operating display screen equipment workstations.
- Controls and safe systems for personnel involved in the use of vibrating tools that present a risk of hand, arm vibration syndrome.
- Controls and safe systems for whose employees work in noisy environments and implementing effective noise control techniques.
- To provide reasonable adjustments for people with disabilities to support them in employment.
- To manage early return to work after sickness certification and wherever possible support rehabilitation after prolonged illness.

Occupational Health Screening

The company may arrange and finance health monitoring or screening for employees where required. The Managing Director may request individual employees to attend a medical examination where recommended by in a formal occupational health assessment. Such an examination would be carried out by mutual agreement and the results classified as "Medical in confidence" information by the Managing Director.

The organisation may hold information about the health of staff. This information and any records will not be divulged to any nonmedical staff, without the written consent of the members of staff.

The purpose of occupational medical examination is to identify cases of illness potentially induced by work related undertakings or where the works process exacerbates existing medical conditions.

Signed on behalf of RW Hill Piling Ltd.



Howard Sidebottom
Director of Health and Safety.
01/11/2019

Review Date: 31/10/2020

Quality Policy Statement

RW Hill Piling Ltd is dedicated to ensure that all of its products and services fully meet the requirements of its customers at all times. The goal of the Organisation is to achieve the highest level of customer satisfaction.

Howard Sidebottom has been appointed by the Organisation to have overall responsibility for all quality matters. The implementation of this policy and the associated procedures will be monitored and reviewed to ensure that progress is made against the quality objectives and targets on a regular basis to ensure that they remain current and applicable to the Organisation's activities. This review will be carried out by the Organisations external consultants AM Specialists Group Ltd.

Howard Sidebottom and the Senior Management of the Organisation has following consultation with their external consultants AM Specialists Group Ltd, ensured that this policy is appropriate to the nature and scale of the Organisation's activities.

The Organisation believes in the concept of the client and supplier working together in pursuing this policy and in continually striving for improvements in service quality.

This quality policy is based on 3 fundamental principles:

- Ensuring that the Organisation fully identify and conform to the needs of our customers.
- Looking at the service the Organisation provides, identifying the potential for errors and taking the necessary action to eliminate them.
- Ensuring everyone within the Organisation has an understanding of our client requirements and performs their job to the highest standard first time, every time.

The Organisation's objective is to achieve so far as is reasonable practicable, commitment to the highest level of quality:

- The appointment of Howard Sidebottom to act as the organisations responsible person on quality issues.
- The appointment of AM Specialists Group Ltd to assist Howard Sidebottom, by providing advice, assistance and guidance as required.
- The organisation will provide duties and responsibilities to cover all levels of management and ensure understanding and compliance of this policy.
- Ensuring the policy is communicated or displayed within all areas, including remote locations.
- Providing sufficient resources and allocation of funds to effectively implement this policy.
- Regularly reviewing the Organisations performance, and setting objectives and targets aimed at improving the organisations quality performance.
- Seeking to continually improve company and management systems, operating practices and cultures in all areas that may lead to improved quality performance.

To ensure that the policy is successfully implemented, Senior Management will be responsible for identifying customer requirements, communicating these requirements to the team and ensuring that the correct procedures are followed to meet those requirements.

Objectives needed to ensure that the requirements of this policy are met and that continual improvement is maintained in line with the spirit of the policy, will be set, determined and monitored at Management Review.

The quality policy principles and objectives will be communicated and available to staff at all times. Training will be an integral part of the strategy to achieve the objectives.

Smoking at Work Policy

It is the Policy of RW Hill Piling Ltd. to protect all employees, service users, customers and visitors from exposure to second-hand smoke and to comply with the Health Act 2006.

From July 1st 2007 all workplaces were made smoke free. Smoking is therefore prohibited in all enclosed and substantially enclosed premises within the workplace. This policy applies to anything that can be smoked, including cigarettes, pipes (including water pipes such as shisha and hookah pipes), cigars and herbal cigarettes, and it also applies to electronic cigarettes (also known as e-cigarettes) and Vapers. This includes all company vehicles. This policy applies to all employees, consultants, contractors, customers or members and visitors.

Overall responsibility for policy implementation and review rests with Howard Sidebottom.

All staff are obliged to adhere to and support the implementation of the policy. The person named above shall inform all existing employees, consultants and contractors of the policy and their role in the implementation and monitoring of the policy. They will also give all new personnel a copy of the policy on recruitment / induction.

Appropriate 'no-smoking' signs will be clearly displayed at the entrances to and within the premises, and in all smoke free vehicles.

Local disciplinary procedures will be followed if any employee does not comply with this policy.

Those who do not comply with the smoke free law may also be liable to a fixed penalty fine and possible criminal prosecution.

Signed on behalf of RW Hill Piling Ltd.



Howard Sidebottom
Director of Health and Safety.
01/11/2019

Review Date: 31/10/2020

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Sustainability Assessment & Policy

(Incorporating environment, waste, and corporate social responsibility) V3. Last issued August 2012

1. Summary Statement

RW Hill Piling Ltd is committed to promoting sustainability. Concern for the environment and promoting a broader sustainability agenda are integral to the professional activities of RW Hill Piling Ltd and the management of the organisation.

We strive to follow and to promote good sustainability practice, to reduce the environmental impacts of all our activities and to help our clients and partners to do the same.

We are committed to continually improve the integration of sustainability into our working environment and business processes.

Our aim is to play a proactive role in contributing to achieving sustainability where we have influence.

Our Sustainability Policy is based upon the following principles:

- To comply with, and exceed where practicable, all applicable legislation, regulations and codes of practice.
- To integrate sustainability considerations into all our business decisions.
- To ensure that all staff are fully aware of our Sustainability Policy and are committed to implementing and improving it.
- To minimise the impact on sustainability of all office, production, transportation and construction activities in which we are involved.
- To make clients and suppliers aware of our Sustainability Policy, and encourage them to adopt sound sustainable management practices.
- To review and to continually strive to improve our sustainability performance.

2. Assessment

RW Hill Piling Ltd have assessed the environmental and sustainable impact of our activities and consider our two main areas of environmental impact are travelling/ fuel and use of consumables/ packaging.

We are firmly resolved to save raw materials and energy and exert a minimum load on the environment

3. Policy and Practical steps

In order to put our sustainable principles into practice we aim to practice the following steps wherever possible within our activities and encourage our suppliers and customers to do the same

3.1 Travel and meetings

- Walk, cycle and/or use public transport to attend meetings, site visits etc, apart from in exceptional circumstances where the alternatives are impractical and/or cost prohibitive.
- Include the full costs of more sustainable forms of transport in our financial proposals, rather than the least cost option which may involve travelling by car or air.

- Where the only practical alternative is to fly, we will include costs for full air fares rather than budget airlines in our financial proposals, and appropriate offsets.

Avoid physically travelling to meetings etc where alternatives are available and practical, such as using teleconferencing, video conferencing or web cams, and efficient

- timing of meetings to avoid multiple trips. These options are also often more time efficient, while not sacrificing the benefits of regular contact with clients and partners.
- To reduce the need to travel to meetings and elsewhere, and facilitate regular client contact, we will arrange a web cam to clients for the duration of a project where appropriate.
- Reduce the need for our staff to travel by supporting alternative working arrangements, including home working etc., and promote the use of public transport by locating our offices in accessible locations.
- Actively encourage staff to travel to work by public transport, cycle or walking.
- Use an emissions recording scheme for business travel to monitor our impact.
- Encourage car pooling

Consumption of resources

3.2.1 Paper, Stationary and consumables

- Fax on used paper
- Print drafts on used paper
- Make note pads from scrap paper
- Spell check pre-printing to avoid mistakes and re-printing
- Use a smaller font size so less printing is required
- Minimise paper use via the increasing use of electronic means
- Email items where possible in preference of printing and posting.
- Minimise our use of paper and other office consumables, for example by double-siding all paper used, and identifying opportunities to reduce waste.
- All copier paper to be at least 80% recycled
- All office pads (flipcharts, bound pads, shorthand notebooks etc.), as well as envelopes, to be of recycled material
- Filing and storage products made from recycled paper include hanging
- Files, lever arch files, box files, document wallets and square cut folders;
- Email footers include a statement to encourage the reader to save paper by either not printing, or if necessary, printing double sided;
- All new printers to be capable of duplex printing
- Minimise the amount of waste generated by encouraging staff, suppliers and clients to use electronic means of communication instead of paper means except where necessary

3.2.2 Use of Electronic Equipment

- We minimise energy consumption with a "Turn it off" Policy and a "No Stand-by " policy throughout all our premises.
- We aim to influence behaviours to ensure that unused equipment is fully switched off and not left on standby.
- We are currently investigating technological solutions to minimise power consumption out of hours on IT equipment.
- All redundant office equipment will be sold or donated for reuse or recycled
- As office equipment is replaced, we purchase the most energy efficient equipment when compared with alternatives of a similar cost and performance and the most resource efficient equipment (e.g. toner waste etc) compared with alternatives of a similar cost and performance
- Use of Eco Buttons on computers to minimise wasted energy when users are away from their desks for long and short periods

3.2.3 Packaging

- Minimise waste generated by using only essential packaging required to supply our products.
- Source recycled packaging wherever possible.
- Encourage our suppliers to minimise their packaging when delivering items to us

3.3. Waste

As far as possible, we arrange for the reuse or recycling of office waste, including paper, computer supplies and redundant equipment.

- All waste paper, toner and ink cartridges, batteries, glass, cans, tins, plastic bottles, wood off cuts and wood dust are recycled or reused.
- Mobile phones, machinery, electronic and computer equipment is recycled or reused where possible.
- We order only what we need to use to minimise wastage of new and raw materials, especially on client sites.
- We encourage our contractors to order exactly what they require to perform a task to minimise wastage or raw and new materials.
- When managing sites, we encourage all contractors to keep and reuse as much material as possible, rather than place it in the waste facilities.

3.4 Energy Consumption

- Reduce the energy consumption of office equipment by purchasing energy efficient equipment and turning items off completely when not in use
- Good Housekeeping can minimise energy consumption. We educate our staff to take simple housekeeping measures to minimise energy consumption such as closing doors to keep heat in and keeping electronic equipment adequately ventilated to avoid excessive heat generation and overuse of energy for cooling.
- We aim to purchase electricity from a supplier committed to renewable energy.
- We seek to maximise the proportion of our energy that comes from renewable energy sources, whilst also supporting investment in new renewable energy schemes to minimise the impact of the energy.
- All lighting to use low energy bulbs where possible
- Ensure computer equipment is set to go to standby when left for a short period and equipment turned off at night where practical.
- Install thermostat for heating, if practicable, to minimise heat wastage.
- To ensure hot water is of an appropriate temperature to minimise energy wastage in heating water.
- Consider and encourage the use of modern energy efficient machinery wherever possible

3.7 Water Consumption

- To minimise unnecessary use of water, as equipment is replaced in RW Hill Piling Ltd premises, we try to purchase the most water efficient equipment when compared with alternatives of a similar cost and performance
- Use push style taps wherever possible to minimise wastage of water
- Use toilet tank water minimisers where possible.
- Only fill kettles for required amount
- Ensure that minimal water is used during cleaning of our premises, equipment and machinery.
- We try to develop measures that could be taken to reduce water use in the future

3.8 Emissions and Atmosphere

- To reduce the impact of emissions / toxins from office equipment wherever possible to minimise environmental impact.
- Create a healthy working environment - including having plants in the office
- To minimise our atmospheric impact, we try to actively reduce our use of energy and emissions of greenhouse gases in transport, design, construction, maintenance and in the operation of our facilities.
- We aim to use products and supplies that have been produced by methods resulting in lower emissions wherever possible and to use products that have minimal emissions wherever possible.
- Contribute to our local community and the environment in supporting local green schemes wherever possible

3.9 Purchasing policies

- We aim to reduce the total impact of products purchased (including product miles)
- Ensure that timber furniture and any other timber products, are recycled or from well-managed, sustainable sources and are certified.
- Purchase products and use suppliers locally to our premises or client sites, wherever practical to minimise product miles
- Where possible and client demand allows, purchase fair trade or organic products.
- To reduce the impact of beverages purchased and to support fair-trade, purchase fair-trade and/or organic food and beverages for our premises.
- 100% of tea and coffee purchased fair-trade
- All waste bags to be made from recycled and / or biodegradable plastic
- Replace company cars with more efficient models as they become due for replacement

3.10 Working practices and advice to clients

- We seek to generate a business culture that actively encourages best sustainable practices through information and education of our staff, suppliers and customers.
- We seek sustainable consumption and production by working with our customers and suppliers to achieve 'more with less', through more efficient use of human and material resources, considering life cycle impacts and delivering sustainable, profitable and socially beneficial outcomes.
- Sustainability is a key objective of our designs. We aim to achieve sustainability in life-cycle design and exceed our customer expectations by delivering more cost effective sustainable solutions.
- We try to do 'more with less' by maximising resource efficiency in planning, design, waste minimisation and recycling.
- We aim to do more with the same amount of raw materials, through use of staff ideas, new technology and more efficient machinery.

- Where possible, RW Hill Piling Ltd strives to recommend sustainable and environmental design and planning options for our clients. Simple steps such as the installation of water conserving toilet facilities or push taps that dispense a limited amount of water per push are simple ideas that contribute to sustainability.
- We ensure that any associates that we employ take account of sustainability issues in their advice to clients.
- We will include a copy of our Sustainability Policy in all our proposals to clients.
- Encourage all employees to undertake voluntary work with the local community and / or environmental organisations and make donations to seek to offset carbon emissions from our activities.
- Provide public transport details for accessing all RW Hill Piling Ltd sites in order to encourage public transport use.
- Source sustainable and environmentally friendly staff rewards.

4, Training and Information

RW Hill Piling Ltd recognises that its employees are key to the success of all our policies and strategies and as such, we ensure they are well informed and trained in achieving our goals

- We actively encourage and reward employee suggestions that increase our achievements in sustainability, environmental impact reduction, recycling, reuse, health and safety and efficient working practices.
- We produce advice and information for employees on sustainability in their job roles.
- Staff are given time, support and resource to review sustainability and environmental trends, market pressures and public and political attitudes in our market sector and their job roles to ensure they are involved, informed and committed.
- Staff are encouraged to contribute recommendations for the sustainable and environmental policies and activities.
- Staff are given time, money and facilities to participate in voluntary environmental/community activities outside and within working hours

5, Monitoring and reporting

The Director is responsible for sustainability throughout the organisation and for the implementation of this policy. Our Sustainability Policy will be monitored and reviewed annually to ensure we are continually improving the integration of sustainability into our working environment and business processes and playing as proactive a role as we can in contributing to achieving sustainability where we have influence.

Signed on behalf of RW Hill Piling Ltd.



Howard Sidebottom
Director of Health and Safety.
01/11/2019

Review Date: 31/10/2020

Working Time Directive Policy

The Working Time (Amendment) Regulations 2003 are part of the Health & Safety Legislation and the HSE has the power to prosecute for breaches. Employees may enforce their rights to paid leave and rest in the Employment Tribunal. The regulations do not apply to Road Transport.

There are different requirements for "adult workers" who have reached the age of 18 and "young workers", who are between the ages of 15 and 18. This guidance deals solely with how these Regulations affect adult workers.

Employees are restricted to an average maximum working time of 48 hours in any 7 days, including overtime, unless they have signed an agreement to the contrary. This agreement may be for a fixed period or last indefinitely. It may be cancelled by the worker at any time by giving a minimum of 7 days' notice. The reference period for calculating the average weekly working time will normally be 17 weeks.

Night workers are defined as persons whose normal hours of work include 3 or more hours between 11 pm. and 6 am. They must not, on average, work more than 8 hours in any 24 hours over a 17 week reference period. This restriction only applies to normal working hours and so excludes overtime. If the work involves special hazards or heavy physical or mental strain posing a significant risk to Health & Safety, workers must not exceed 8 hours of night working in any 24 hours period. Employees are entitled (but need not accept) free confidential health checks before commencing night work, and then at regular intervals with a suggested minimum frequency of 12 months.

Rest breaks of 20 minutes uninterrupted, away from any work station are an entitlement where employees are at work for more than 6 hours. Workers are entitled to an uninterrupted rest period of 11 hours each day and one of 24 hours in each 7 day period. The employer may decide to provide the employees with two rest periods of 24 hours per 14 day period or one rest period of 48 hours in the same period of time.

Paid annual leave is an entitlement of workers who have 13 weeks continuous service. The entitlement will be 4 weeks annual paid leave.

Workers involved in security activities are one of a number of special cases to which the regulations on night working, rest breaks and rest periods do not apply.

Adequate records must be kept by employers for 2 years showing that the requirements of a 48 hours week, night work and regular health assessments have been met. These records must be made available for inspection by any HSE or other authority appointed inspector upon request. As regards the 17 week reference period employed to calculate average working time and night work, an adjustment must be made for holidays and sickness periods etc. taken in the reference period, by including in the calculation an equal period of days from the beginning of the next reference period.

Signed on behalf of RW Hill Piling Ltd.



Howard Sidebottom
Director of Health and Safety.
01/11/2019

Review Date: 31/10/2020

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Worksafe Policy

RW Hill Piling Ltd acknowledges its responsibility under the Health & Safety at Work Act and recognises our duty of care and undertake to maintain safe systems of work and operates a Worksafe Policy (or Refusal to Work Policy) for all of our staff and sub-contractors working on our behalf.

Risk Assessments are carried out in line with the Management of Health & Safety at Work Regulations and the Company's Health & Safety Policy. Control measures are put in place including Method Statements, COSHH information and Toolbox Talks to reduce risks as far as reasonably practical.

Sufficient training and mentoring is provided to ensure the competence of all staff and we do not expect any employee or sub-contractor to undertake any duties unless they are competent, have been briefed on any relevant information specific to the task and have suitable protective equipment (PPE).

RW Hill Piling Ltd requires all employees and sub-contractors to work safely at all times and to ensure that others around them work safely. This includes complying with site rules, all site specific procedures and instructions, wearing correct and appropriate PPE and the use of the correct tools and equipment.

The employee or sub-contractor may refuse to carry out a method of working when it puts the life, health or safety of himself/herself or another person in danger.

Employees and sub-contractors refusing to work on Health & Safety grounds will be supported and no disciplinary action, financial or other penalty will be taken. Escalation for resolving a refusal to work is through the senior person on site in the first instance and any reports of unsafe working will be investigated and appropriate remedial action will be taken.

Signed on behalf of RW Hill Piling Ltd.



Howard Sidebottom
Director of Health and Safety.

01/11/2019

Review Date: 31/10/2020

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