Company Policies

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Controlled

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The Issue Status

This Company Policies document is the property of Gardiners. It is a controlled document and is approved for adequacy prior to issue by our Systems Manager Kenton Hodges.

This document is reviewed and updated as necessary and re-approved prior to re-issue by Chris Gardiner.

This document is available in both hard copy and electronically and made available to all staff to ensure that it is available at point of use.

Should there be any alterations to this document a copy of the obsolete document shall be archived for a period of at least one year and all other obsolete documents will be destroyed in order to prevent their unintended use.

The version status of this document is identified in the table below.

Revision Date	Version No.	Amendment (page No & detail)	*Authorised by:
30/09/10	v1	Original	Robert Gardiner
17/08/11	v2	Address Change, addition of Equal Opportunities and Corporate and Social Responsibility Policies	Robert Gardiner
24/09/12	v3	Review periods clarified within policies. Minor corrections	Robert Gardiner
07/03/14	V4	Review with no changes	Robert Gardiner
16/09/15	v5	Review, authorisation authority change	Chris Gardiner
26/09/16	v6	Review of Policies, addition of Anti-Bribery Policy (from Handbook) and New Modern Slavery Policy	Chris Gardiner
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by signature	of Policy Doc	uments held by Systems Manager	

Introduction

This document contains Gardiners' Company Policies.

Compliance with the requirements is mandatory for all employees and subcontractors.

Policies (and Objectives where appropriate) are included for the following Gardiners' Management Systems:

Quality ISO 9001

Environment ISO 14001

Health and Safety BS OHSAS 18001

Equal Opportunities
 Employment Law and approved codes of practice

Corporate and Social Responsibility

Anti-Bribery Policy

Anti-Slavery and Human Trafficking Policy

These Company Policies and Objectives may be issued to staff, clients, contractors and other interested parties from time to time.

The purpose of this document is to enable the issue of the Policies and Objectives independently of the full system documentation.

Individual Policies are also published on Gardiners' public website.

Quality Policy

Gardiners are committed to providing a service according to client's expectations in terms of quality and reliability and will ensure that adequate resources are available to sustain our planned business objectives.

It is the policy of the organisation to commit and maintain a quality system designed to meet the requirements of BS EN ISO 9001:2008 in pursuit of its primary objectives.

The Company's Quality Manual defines our quality objectives and key procedures which include how we commit to provide adequate physical resources.

Client service is an essential part of the quality process and to ensure this is fulfilled, all employees receive training to ensure awareness and understanding of quality and its impact on client service.

Gardiners ensure that the Quality Manual is communicated and understood throughout the Company. To ensure that Gardiners commits and maintains its awareness for continuous improvement, senior management formulate and implement this policy to ensure that the quality system is regularly reviewed and is subject to annual audit.

Gardiners' senior management ensure the continuing suitability of this Policy, our Objectives and the Quality Management System which is monitored by our Systems Manager, whose duties will be carried out as defined within our Quality Manuals.

The requirements of the organisation's quality system are mandatory and all personnel have a responsibility and obligation to it.

Chris Gardiner Managing Director





















Quality Objectives

Gardiners set Quality Objectives to set measurable targets and focus our commitment to our clients:

- To maintain an effective Quality Management System complying with BS EN ISO 9001:2008.
- To achieve and maintain a level of quality which enhances the Company's reputation with clients
- To support this strategy and to encourage further quality achievements, the Company's
 management is committed to maintaining a continuous and visible commitment to quality,
 investment in people and infrastructure, and the continuous monitoring and measuring of
 performance required to maintain standards
- To evaluate our plans for growth while maintaining our focus on the quality of our services.
- We will conduct our business in an ethical and professional manner.
- We will endeavour to satisfy our clients' requirements and get things right first time. Should we make a mistake, we will admit it and put things right as soon as possible.
- Evaluate our suppliers to ensure that they are delivering quality that is consistent with our requirements.
- We will analyse client feedback data, internal performance data, financial performance data and business performance data to ensure that our Quality Objectives are being met.
- To ensure that our policies and procedures are reviewed and updated where applicable to remain relevant to current business practice.
- To achieve these primary goals, our marketing strategy is to focus on a manageable number
 of closely related market segments, determining our clients' expectations, and matching our
 capabilities in service and product provision to meet these expectations.

The following are guidance as to achieving Quality management and our approach to quality:

Standards and methodologies for project management quality assurance to any project will be defined after consultation with the client and/or their representatives prior to commencement of work.

- Working in partnership with client and utilising a consultative approach to ensure broad client support.
- Effective processes to support arrangements for good governance and accountability.
- Input from individuals with appropriate subject or technical expertise to ensure development of outputs that are fit for purpose.
- Standards for output quality which adhere to relevant building codes of practice and/or agreed samples/standards.

It is the desire of Gardiners to ensure that all works meet or exceed the required standards and only by the careful management of the works can this quality be achieved.

Our Quality Objectives are subject to review at least annually to determine that they are adequate and relevant to our current business purpose.























Environmental Policy and Objectives

Gardiners are committed to conduct its business with respect and care for the environment.

The Directors of Gardiners regard the promotion of environmental measures as a mutual objective for management, employees at all levels and those working for or on behalf of the company, and are committed to providing the resources necessary to fully implement the Company's Environmental Policy which is designed to satisfy the requirements of the BS EN ISO 14001:2004 standard, and operate environmental best practice throughout the company.

Our company will carry out its activities with consideration for the environment as part of the process to prevent pollution and minimise waste.

In order to meet the above requirements, Gardiners will:

- Hold all employees and contractors accountable for environmental performance of their areas of responsibility;
- Monitor our use of energy, transport and natural resources with a view to reducing our impact on the environment;
- Support process modifications and products that reduce pollution and waste and encourage recycling;
- Maintain sufficient documentation to demonstrate compliance with the environmental requirements;
- Work with our contractors and suppliers to promote positive environmental actions in accordance with our stated objectives,
- Comply with all applicable environmental legislation and recognise other relevant requirements that may be placed upon us by our customers.
- Assess, in advance where possible, environmental impact resulting from business operations and the environmental effects of any significant development, and adjust the company plans accordingly.
- Ensure that all incidents and non compliance situations are reported, recorded and route causes identified where environmental harm occurs or could have occurred and ensure that corrective and preventive actions are implemented.
- Demonstrate our commitment to continual improvement by setting targets and objectives for our services and Company activities and review these measures on a regular basis.
- Maintain an open communication environment, whereby, all employees can actively participate
 in the Environmental Management System. Managers and supervisors are encouraged to
 address employees' questions and concerns promptly and thoroughly.
- To communicate and provide the necessary information, instruction, supervision and training to enable all persons, affected by the Company's undertakings, to carry out their environmental duties.

continued





















This policy will be made available to our employees, to those working for or on behalf of the Company and provided on request to any other interested parties.

This policy will be periodically reviewed in accordance with Company procedure. We also recognise that we have a responsibility to encourage our suppliers, to assist us in achieving our environmental objectives by providing products and services that are in-line with best environmental practice.

Responsibility

Kenton Hodges has the overall responsibility for the implementation, review and continual improvement of the Environmental Management System.

The Environmental Policy is reviewed at least annually by Directors and staff representatives. The review incorporates the co-ordination, implementation, monitoring and continual improvement of the Environmental Review throughout the company.

The Environmental Policy and Action Plan will be communicated to all staff. Copies may be made available to customers on request.

Each employee is accountable for:

- Co-operating with the company to achieve safe, healthy and environmentally sound operations within our site and outside;
- Not interfering with, or misusing any device provided to meet our environmental obligations or policy;

The Company's Environmental Policy will play a key role in working toward sustainable development, because the health and well-being of our environment is crucial for providing us all with a good quality of life, both today and for the years to come.

Chris Gardiner Managing Director























Health and Safety Policy

It is the policy of Gardiners to comply with the terms of the Health and Safety at Work Act 1974 and subsequent legislation and to provide and maintain a healthy and safe working environment.

The objective of Gardiners' health and safety policy is to minimize the number of instances of occupational accidents and illnesses and ultimately to achieve an accident-free workplace.

Gardiners commit to continual improvement of health and safety performance through the application of the Health and Safety system designed to meet the requirements of BS OHSAS 18001:2007.

All employees will be provided with such equipment, information, training and supervision as is necessary to implement the policy and achieve the stated objective.

Gardiners recognize and accept their duty to protect the health and safety of all visitors to the company, including contractors and temporary workers, as well as any members of the public who might be affected by our operations.

While the management of Gardiners will do all that is within its powers to ensure the health and safety of its employees, it is recognized that health and safety at work is the responsibility of each and every individual associated with the company. It is the duty of each employee to take reasonable care of their own and other people's welfare and to report any situation which may pose a threat to the well being of any other person.

The management of Gardiners will provide every employee with the training necessary to carry out his or her tasks safely. However if an employee is unsure how to perform a certain task or feels it would be dangerous to perform a specific job then it is the employee's duty to report this to their supervisor. An effective health and safety programme requires continuous communication between workers at all levels.

All injuries, however small, sustained by a person at work must be reported to the immediate supervisor. Accident records are crucial to the effective monitoring and revision of the policy and must therefore be accurate and comprehensive.

Gardiners' health and safety policy will be continually monitored and updated, particularly when changes in the scale and nature of our operations occur. The policy will be reviewed at least annually.

The specific arrangements for the implementation of this policy and the personnel responsible are documented within Gardiners' Health and Safety manuals.

Chris Gardiner
Managing Director





















Equal Opportunities

Equal Opportunities Statement

Gardiners is committed to building an organisation that makes full use of the talents, skills, experience, and different cultural perspectives available in a multi-ethnic and diverse society, and where people feel they are respected and valued, and can achieve their potential regardless of race, colour, nationality, national or ethnic origins, sexual orientation, gender, disability or age.

Gardiners will follow the recommendations of the Statutory Codes of Practice of both the Commission for Racial Equality and the Equal Opportunities Commission, and the Disability Rights Commission's Code of Practice in Employment and Occupation, in all their employment policies, procedures and practices.

Equal Opportunity Policy

The aims of this policy are to ensure that:

- No-one receives less favourable treatment, on grounds of race, colour, nationality, ethnic or national origins, gender, sexual orientation, religion or belief, disability or age; or is disadvantaged by any conditions, requirements, provisions, criteria, procedures or practices that cannot be justified on any other grounds, or victimised for taking action against any form of discrimination or harassment, or instructed or put under pressure to discriminate against, or harass, someone on the above grounds.
- The organisation is free of unwanted conduct that violates the dignity of workers or creates an intimidating, hostile, degrading, offensive, or humiliating environment.
- Opportunities for employment, training and promotion are equally open to male and female candidates, candidates from all racial groups, candidates with or without disabilities, and candidates of any age, and of any sexual orientation, religion or belief.
- Selection for employment, promotion, transfer, training, and access to benefits, facilities and services, will be fair and equitable, and based solely on merit.

This policy applies to all aspects of employment, from recruitment to dismissal and former workers' rights.

continued





















We will take the following steps to put the policy into practice and make sure that it is achieving its aims:

- 1. The policy will be a priority for the organisation.
- 2. Our Managing Director will be responsible for the day to day operation of the policy.
- 3. The policy will be communicated to all workers and job applicants, and will be placed on the company's intranet.
- 4. Workers and their representatives and trade unions will be consulted regularly about the policy, and about related action plans and strategies.
- 5. All workers will be trained on the policy, on their rights and responsibilities under the policy, and on how the policy will affect the way they carry out their duties. No-one will be in any doubt about what constitutes acceptable and unacceptable conduct in the organisation.
- 6. Managers and workers in key decision-making areas will be trained on the discriminatory effects that provisions, practices, requirements, conditions, and criteria can have on some groups, and the importance of being able to justify decisions to apply them.
- 7. Complaints about discrimination or harassment in the course of employment will be regarded seriously, and may result in disciplinary sanctions, and even dismissal. The complaints procedure is published within Gardiners Employee Handbook which is issued to all staff.
- 8. Opportunities for employment, promotion, transfer and training will be advertised widely, internally and externally, and all applicants will be welcomed, irrespective of race, colour, nationality, ethnic or national origins, gender, sexual orientation, disability or age, religion or belief.
- 9. All workers will be encouraged to develop their skills and qualifications, and to take advantage of promotion and development opportunities in the organisation.
- 10. Selection criteria will be entirely related to the job or training opportunity.
- 11. We will make reasonable changes to overcome physical and non-physical barriers that make it difficult for disabled employees to carry out their work, and for disabled customers to access our services.
- 12. We will take a flexible approach to working arrangements. We will consider requests for changes carefully and objectively, and will accommodate them unless it would cause significant difficulties to the business or the employee.
- 13. Information on the ethnic and racial background, gender, disability, and age of each worker and applicant for employment, promotion and training will be collected and analysed, to monitor each stage of the recruitment process. The information will be held in strictest confidence and will only be used to promote equality of opportunity. Information about the religion/belief and sexual orientation of employees may also be monitored.

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- 14. Grievances, disciplinary action, performance assessment, and terminations of employment, for whatever reason, will also be monitored by gender, racial group, age, disability, religion/belief and sexual orientation.
- 15. Requirements, conditions, provisions, criteria, and practices will be reviewed regularly, in the light of the monitoring results, and revised if they are found to, or might, unlawfully discriminate on any of the above grounds.
- 16. All contracts between Gardiners and contractors to supply goods, materials or services will include a clause prohibiting unlawful discrimination or harassment by contractors and their staff, and by any sub-contractors and their staff. The clause will also encourage contractors and potential contractors to provide equality of opportunity in their employment practices.
- 17. The effectiveness of the policy will be monitored regularly. A report on progress will be produced each year, and published via the intranet, the staff newsletter, notice boards, and the annual report.
- 18. Customers and clients will be made aware of the policy, and of their right to fair and equal treatment, irrespective of race, colour, nationality, national or ethnic origins, sexual orientation, gender, religion/belief, disability or age.
- 19. The company will draw up an Action Plan detailing how this policy will be implemented in practice.

This policy has been endorsed by our Managing Director and has the full support of the Board of Directors.

This policy will be reviewed at least annually, following consultation with senior managers, workers and workers' representatives.

Overall responsibility for the effectiveness of the policy lies with our Managing Director.

Chris Gardiner
Managing Director























Corporate and Social Responsibility

Gardiner's corporate and social responsibility policy provides a common behavioural, ethical and legal framework for all our employees.

This means:

We obey the law and are committed to the highest standards of corporate governance.

We behave with honesty and integrity.

We have regard for the views of our stakeholders and strive to be a good corporate citizen.

We are committed to the safety and health of our employees, our sub-contractors, our suppliers, our clients and the general public who we interact with.

We value the rights and dignity of the individual and our words and actions demonstrate our belief in treating people with respect and fairness.

We value a diverse workforce.

We compete fairly and will not engage in corrupt practices.

We communicate in an open and timely manner.

We are committed to sustainable development and to achieving exemplary environmental performance.

Chris Gardiner Managing Director





















Anti-Bribery Policy

Bribery is a serious criminal offence and corrupt acts expose the Employer and its employees to the risk of prosecution, fines and imprisonment, as well as endangering the Company's reputation. We are committed to the prohibition of such conduct. This is not just a cultural and moral commitment on the part of the organisation; it is a legal requirement.

The Company has a strict anti-bribery and corruption policy in line with the Bribery Act (2010). A bribe is defined as: giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.

If you bribe (or attempt to bribe) another person, intending either to obtain or retain business for the company, or to obtain or retain an advantage in the conduct of the company's business this will be considered gross misconduct. Similarly accepting or allowing another person to accept a bribe will be considered gross misconduct. In these circumstances you will be subject to formal investigation under the Company's disciplinary procedures, and disciplinary action up to and including dismissal may be applied.

Chris Gardiner Managing Director





















Anti-Slavery and Human Trafficking Policy

Gardiners is committed to building an organisation that respects equal opportunities, fair trading and social responsibility. It is the policy of Gardiners to comply with existing national and local laws and regulations including the Modern Slavery Act 2015 which relates to slavery, human trafficking, labour and immigration. We will ensure that there is no modern slavery within our own business and supply chains.

Gardiners provide maintenance and installation services within the United Kingdom and our supply chains may include materials and services procured from both inside and outside of the UK.

Gardiners will ensure that modern slavery is not present within our business or supply chains. To ensure compliance, we will:

- Conduct employment checks in accordance with UK Government standards to ensure that our employees are legally entitled to work in the UK.
- Commit to ensuring that our suppliers also meet our standards and do not use slave labour or engage in human trafficking.
- Seek confirmation from suppliers that our policy is met
- Promptly and thoroughly investigate any claims or indications that a supplier is engaging in human trafficking or slave labour and reserve the right to exclude non-compliant suppliers from our supply chain
- Report violations of this policy to the relevant authority.
- Promote staff awareness of modern slavery throughout our organisation through training

This policy has been endorsed by our Managing Director and has the full support of the Board of Directors.

This policy will be reviewed at least annually, following consultation with senior managers, workers and workers' representatives.

Overall responsibility for the effectiveness of the policy lies with our Managing Director.

Chris Gardiner
Managing Director



















