



Capital Maintenance Ltd
A Sasse Group Company

STAFF HANDBOOK

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Welcome to Capital Maintenance Ltd A Sasse Group Company!

On behalf of your colleagues, I welcome you to Capital Maintenance Ltd and wish you every success in our company.

We are excited to have you as part of our team. You were hired because you stood out and we believe you can contribute directly to the achievement of the goals of Sasse while also progressing in your career. We hope you will take pride in being a member of our team.

Sasse is committed to distinctive quality and unequalled service delivery in all aspects of our business shaped by attributes such as professional & innovative. Our philosophy is based on mutual respect for employees and partners coupled with thinking and acting in a sustainable manner. As part of the team, you will be challenged to pursue excellence which will become a truly rewarding aspect of your career. As a team member, you must "own" the results of your productivity.

This handbook was developed to describe some of the expectations of our employees and to outline the policies, programs, information and benefits available to eligible employees.

The success of Sasse is determined by your success in operating as a team and your ability to be part of this team. We have to earn the trust and respect of our customers every day in order that the customer make the decision to choose our services. We sell services and services are provided by people.

We hope that your experience here will be challenging, enjoyable, and rewarding. Again, welcome!

Sincerely,

Benny Wunderlich
Managing Director

We think Sasse. We think corporate culture.



VISION

Family-led company
Reliable business partner
Professional & Innovative
Correct & stable



MISSION

Identification with our clients' individual needs
Innovative solutions create value for our clients
High customer satisfaction through Service Excellence



VALUES

Thinking & acting sustainably
We contribute to economic & social progress
Respectful interaction with our valued employees



SECTION 1 – CONTRACTUAL POLICIES

1.1 ALCOHOL AND DRUG MISUSE AT WORK POLICY

INTRODUCTION

This Capital Maintenance Drug and Alcohol at Work policy is designed to promote a safe, healthy, and productive workplace at Capital Maintenance Ltd by addressing the potential challenges and risks associated with drug and alcohol use. The use of drugs and alcohol in any workplace is associated with impaired judgement, increased risks of incidents, accidents, injuries, decreased productivity, compromised decision-making and in worse cases, violence, and aggression (which is covered under the Violence and Aggression Policy).

This policy also sets to outline support for our employees who may be facing substance misuse challenges, emphasising our commitment to employee wellbeing

SCOPE

Capital Maintenance Ltd has a general duty under Section 2 of the Health and Safety at Work Act 1974 to ensure the health, safety, and welfare of its employees. This policy therefore applies to all employees and contractors / sub-contractors who work on our behalf.

PROHIBITED BEHAVIOURS

The following behaviours are prohibited at Capital Maintenance Ltd regarding alcohol and drugs:

ALCOHOL

1. No alcohol is permitted to be carried in any company vehicle or on a member of staff's person whilst on company business and/or during working hours.
2. Anyone who is considered by the company to be unfit for work due to the influence of alcohol will be required to return home until further notice.
3. If a member of staff is under the influence of alcohol to the extent that they are unfit to carry out his or her duties, this may be regarded as gross

misconduct.

4. Conduct under the influence of alcohol which constitutes any threat to the health and safety of colleagues, clients, visitors, or members of staff shall be regarded as gross misconduct. Such conduct may also constitute a breach of Section 7 of the Health and Safety at Work Act 1974 and as such the employee under the influence could be liable to prosecution.
5. A conviction for an offence due to the influence of alcohol (even if it occurs outside of normal working hours) which damages the reputation of the company and undermines the employer's confidence in the member of staff or adversely affects the employee's relationship with colleagues, shall be regarded as gross misconduct.
6. Anyone attending work functions on behalf of the company or on general company business who is driving a car (whether a company car or private car) will be expected to keep within legal alcohol limits.
7. If a member of staff is required to drive to carry out his or her duties, the Company may, if appropriate, dismiss the member of staff if he or she is disqualified from driving for an alcohol related offence.
8. New starters and employees who join Capital Maintenance Ltd will be required to enter an employment contract which includes provision for the company to screen for alcohol at random (as well as specific testing if there is a suspicion of breach of this policy). If a member of staff fails to comply with a contractual provision permitting screening without a reasonable explanation, the company may invoke a disciplinary procedure.
9. Existing members of staff who do not have provisions in their contracts of employment permitting medical screening may be asked to give consent to be screened for alcohol in cases where there is reasonable cause to suspect breach of this policy.
10. On the occasions when the company allow alcohol to be drunk in the office by staff (for example, late Friday afternoon), each employee must do so in a sensible manner. Under no circumstances should a member



of staff consume alcohol prior to attending any client meeting or making a decision involving health and safety. If a member of staff does choose to consume alcohol, then consideration must be given to their remaining tasks in the office for that day.

DRUGS

For the purposes of this policy, the definition for 'Drugs' means controlled substances, glue, lighter fuel, solvents, prescribed drugs, and any substance which may impair reasoning or performance which are misused.

1. It is a criminal offence under the Misuse of Drugs Act 1971 to use, possess or deal in any controlled substances and anyone caught on the company's premises during work hours or on the company's business involved in any of those activities may be regarded as having committed an act of gross misconduct. The company reserves the right to call the police in any case it deems necessary.
2. No member of staff is permitted to attend work under the influence of Drugs.
3. The use of Drugs outside of working hours or a member of staff being charged or cautioned for an offence in connection with Drugs at any time will be regarded as an act of gross misconduct if the conduct damages the reputation of the Company, undermines the employer's confidence in the employee, adversely affects the employee's relationship with colleagues or affects the employee's ability to carry out his or her duties.
4. Screening for drugs may be carried out as per the alcohol policy mentioned above.

SUPPORT AND REHABILITATION

Any member of staff who is struggling with substance (alcohol or drugs) misuse are encouraged to seek specialist help via their GP or local treatment service.

Capital Maintenance Ltd have Mental Health First Aiders, which are currently Jalil Khasanov, James Boden, Alicja Krajewska and David Ferguson, who are available to provide assistance and guidance. Any employee who feels they are struggling will be treated sympathetically and fairly by the company. The MD, the Contracts Manager and any Team Leader are also available at any

time and will refer the issue to the appropriate Mental Health First Aider if necessary.

Help may be in the form of seeking out counselling or general medical assistance and all conversations will be treated in confidence.

It should be noted, however, that any employee refusing to seek assistance and/or continues to carry out the prohibited behaviours mentioned above, it will result in a company disciplinary, which may in turn result in employment termination and possibly law enforcement involvement if deemed necessary.

CONSEQUENCES OF VIOLATION

Violations of this policy including the possession of illegal drugs will result in disciplinary action which could result in employment termination and law enforcement involvement if deemed necessary.

MONITORING AND REVIEW

The Managing Director, and senior management of Capital Maintenance Ltd are committed to the implementation of this policy. It will be reviewed in 12 months or as a result of any changes in risk and/or legislation or new guidance/legal opinion being provided by a health and safety professional to Capital Maintenance Ltd.

1.2 EMAIL AND INTERNET POLICY

Many people use e-mail, whether internal or external, as a substitute for conversation. However, emails are easily distributed to an audience wider than that intended, they can amount to legal documents, and they are in permanent written form.

There are a number of concerns which the Company has in respect of the potential dangers of communicating by e-mail and use of the internet. It is therefore appropriate that the Company has a policy applicable to all its employees so that everyone is aware of the procedures to be used in respect of e-mail and other internet applications. Though all staff should in effect already be complying with the principles set out below:

1. The e-mail and internet systems are the property of the Company and provided to staff for use in conducting company business. Therefore, the Company will treat all messages sent, received, or stored in the e-mail system as business messages. The Company has the capability (and reserves the absolute right) to access, review, audit, copy and delete any messages wherever it has good reason and to disclose them to any person (inside or outside the Company) as it sees fit. In particular, the Company may conduct random monitoring under this provision.
2. The Company reserves the absolute right to block access to certain internet sites which it perceives to be necessary. The Company has software and systems in place that can monitor and record all internet usage. You should be aware that The Company's security systems are capable of recording (for each and every user) each world wide web site visit, and each file transfer into and out of our internal networks, and we reserve the right to do so at any time as is necessary for business purposes. The Company reserves the right to inspect any and all files stored on the Company's computer resources in order to assure compliance with policy. The Company also reserve the right to monitor the types of sites being accessed and the extent and frequency of use of the internet at any time, both inside and outside office hours to ensure that the system is not being abused and to protect the business from potential damage or disrepute. No member of staff should have any expectation of privacy as to his or her internet usage.
3. While occasional and reasonable non-work accessing of the e-mail and internet systems is acceptable, staff must ensure that this access does not in any way prejudice the interests of the Company, for example, because

- of its frequency, duration or the nature of the sites accessed. Non-work accessing should never intrude on work commitments and wherever possible should be restricted to lunch breaks and after hours.
4. Even though the Company has the right to retrieve and read e-mail messages, those messages should still be treated as confidential by other employees and accessed only by the intended recipient. Staff are not authorised to retrieve or read any e-mail messages that are not sent to them. Any exception to this policy must be with the prior approval of Management. The Company reserves the right to access staff e-mails where an employee is off sick or on holiday, in order to ensure that all business e-mails are dealt with.
 5. The Company insists that staff refrain from using the e-mail system or internet access to store, display, generate and / or pass on to others, any material (whether in text, pictures or any other form) which is offensive, illegal, discriminatory, defamatory, obscene, pornographic or otherwise abusive or threatening. It is not always practicable to control the flow of such material inwards from external e-mail users, but this does not take away the responsibility of internal users for any such material they pass on. In particular, the Company will not accept as an excuse for the distribution of such material, that the employee was not aware that it was attached to the message forwarded. The question of what constitutes offensive, illegal, discriminatory, defamatory, obscene, pornographic or otherwise abusive or threatening material is not for the sender to determine. It is the effect on the recipient which is important. Therefore, you should not pass on any material which even risks causing offence to any recipient. Whether or not you intended to cause offence or whether or not you find the material offensive is irrelevant. Sending abusive or threatening e-mails or obscene or pornographic attachments via the e-mail system or accessing internet sites containing such material are gross misconduct offences which are liable to summary dismissal. In addition, they may attract criminal liability. All of the above may result in disciplinary action being taken including dismissal.
 6. The display of any kind of sexually explicit image or document on any of the Company's systems is a violation of the Company's policy and a gross misconduct offence which will be dealt with through the disciplinary procedure. Sexually explicit material may not be archived, stored, distributed, edited or recorded using any of the Company's networks or computing resources.

7. the Company's connection to the internet may not be used for any of the following activities:
- knowing violation of any laws and regulations;
 - knowingly to download or distribute pirated software or data;
 - deliberately to introduce and/or pass on any virus, worm, Trojan horse, or trap-door program code;
 - disabling or overloading any computer system or network, or circumvention of any system intended to protect the privacy or security of another user;
 - excessive personal use of the internet during business hours;
 - downloading entertainment software or games, or playing games against opponents over the internet or intranet;
 - uploading or distribution of any software licensed to the Company or data owned or licensed by the Company;
 - making purchases over the internet; and knowingly downloading pornographic or sexually explicit or otherwise offensive material.
 - ChatGPT and AI platforms can only be utilised for the purpose of common and generic enquiries related to the role of the individual staff member and for no other reason.

Language translation, research, analysis, and customer engagement are not to be used in any capacity on any ChatGPT or AI platforms.

**(Please refer to the relevant policy available in section 5 of the staff handbook)*

Violation of any of the above whether in or outside working hours will be regarded as a gross misconduct offence which is liable to disciplinary action including dismissal.

8. Though e-mail (whether internal or external) may sometimes be a substitute for conversation, it must be remembered that things written down may be interpreted differently from the spoken word, because of the absence of factors such as context, irony, inflection, timing, humour, etc. For this reason the Company expects all e-mails to be written in a courteous, professional and (where possible), amicable tone. We also expect staff to adhere to these principles in conversation and in paper correspondence. This is particularly important for those with management responsibilities over junior staff. The Company will not tolerate bullying by e-mail and the use of obscene language or swear words are strictly prohibited.

9. E-mails are sometimes misdirected or forwarded and may be viewed by persons other than the intended recipient. Staff should write e-mail communications with no less care, judgement and responsibility than they would use for letters or internal memoranda written on the Company's letterhead. If you generate and / or pass on e-mails to other users you must be very clear as to the intended recipient. The inadvertent despatch of material to a collective user group, is no different from sending it individually to all those within that group.
10. If material confidential to the Company or certain people within it is being communicated internally or externally by e-mail, you should take extra care to ensure that the e-mail reaches only recipients who have a right to see that information and agree with the recipient that communication will be made by email before sending or receiving it. Consider, given the lack of secrecy inherent within the e-mail system, whether it would be preferable to use any alternative means of communication. The Company may take disciplinary and/or legal action against you for disclosure of confidential information regarding or belonging to the Company by e-mail during or after termination of your employment.
11. If you have cause to be away from your desk for any period and wish to avoid any risk of abuse of your terminal, you should log out while absent. Otherwise, the Company must assume in the first instance that any material coming from or via your terminal was generated and / or passed on by you. For the same reason you should not reveal your log-on code to any unauthorised person. However, use of passwords or other security measures does not in any way diminish the Company's right to access materials on its system. Any password used by staff must be revealed to the Company when required and should be notified to HR on your leaving the Company. Any monies due to an employee on termination of employment may be withheld until any passwords used by that employee have been disclosed.
12. For both your own and the Company's protection, you should not use the email to distribute or pass on any material which is actually or potentially defamatory of any person or company, whether or not connected with this Company. Jokes at the expense of names or identifiable individuals are included within this prohibition.



13. As with all other business correspondence, e-mails are disclosable in the course of legal proceedings, if they are relevant to the issues raised in those proceedings. It is therefore particularly important that sensitive matters which could be construed as being relevant to any potential proceedings, should not be discussed by e-mail. It may be more appropriate to discuss them during a meeting instead. As e-mails are potentially discoverable documents, you should be aware that by forwarding an e-mail you may very often refer to earlier correspondence, or forward that earlier correspondence attached. Consequently, sensitive matters can be spread exponentially contrary to your original intention. Care should always be taken in regards to content and distribution.
14. If conducting dealings by e-mail with outside companies and suppliers etc, remember you could inadvertently create a binding contract with that third party. You should only deal with third parties by e-mail if your job requires it. Figures should be typed both in words and numbers to avoid expensive clerical errors. Check business e-mails before despatch as carefully as you would check a written contract containing the same matters. You must obtain authorisation before negotiating contracts by e-mail. You must take advice from your Manager before entering into contractual commitments. Managers should always seek legal advice. You must include the statement "subject to contract" in all e-mails if you conduct contractual negotiations via e-mail until such time as it is intended that a binding contract should come into existence. You must be satisfied of the legal identity of the other contracting party before entering into a binding contract via e-mail.
15. Use of the e-mail system to copy and / or transmit any documents, software or other information protected by the copyright laws is prohibited. In particular, if you are permitted to download articles and other materials from the internet, you need permission from the author before using such information for business purposes. The dissemination of copyrighted information is a disciplinary offence which may result in disciplinary action being taken against you, including in serious cases, dismissal. If in doubt, speak to your Manager about whether a particular work is copyrighted. Managers should seek guidance from the Company's legal advisors regarding copyrighted works, details of whom are available from Management.
16. E-mail is one of the most likely points of access of a virus into the Company's computer systems. Attached files and programmes can contain viruses. Users should always take care about opening attachments within e-mails, especially those received from external

sources. Always scan before opening or sending attachments or immediately on receipt of any software or data source received from an external source. If you are unsure of how to scan an e-mail, please contact the Office Manager. Failure to scan viruses is a disciplinary offence.

17. You should ensure that you keep file copies of all business e-mails, as you would for postal or faxed correspondence. You should ensure that you obtain confirmation of receipt of important messages. If you do not obtain a delivery receipt, phone to check the recipient has received the e-mail. Failure to follow this rule may be treated as a disciplinary matter.
18. Staff should routinely delete outdated or otherwise unnecessary e-mails and computer files. These deletions will help keep the system running smoothly and effectively and minimise maintenance costs.

The misuse of the Company's e-mail or internet systems, deliberate or inadvertent, will be treated as a serious disciplinary matter. Please contact HR if you have any questions about this policy.

1.3 EMPLOYEE PRIVACY NOTICE

1. HOW YOUR INFORMATION WILL BE USED

- i. As your employer, Capital Maintenance Limited (“The Company”, “us”, “we”) needs to keep and process information about you for normal personnel management purposes. The information we hold and process will be used for management and administrative purposes only.
- ii. We will keep and use your information:
 - To enable us to run the business and manage our relationship with you effectively, lawfully and appropriately;
 - During the recruitment process;
 - Whilst you are working for us;
 - At the time when your employment ends, and;
 - After you have left

This includes using information to enable us to comply with the employment contract, to comply with any legal requirements, pursue the legitimate interests of the Company and protect our legal position in the event of legal proceedings. If you do not provide this data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision.

- iii. The Company carries out property maintenance related services, we may need to process your data to pursue our legitimate business interests, for example to prevent fraud, administrative purposes or reporting potential crimes. The nature of our legitimate interests are to allow the management of personnel within the business. We will never process your data where these interests are overridden by your own interests.
- iv. Much of the information we hold will have been provided by you, but some may come from other sources, such as:
 - Your manager
 - Senior management team
 - Other members of staff
 - External sources, such as referees

- v. The sort of information we hold includes:
- your application form and references;
 - your contract of employment and any amendments to it;
 - correspondence with or about you;
 - information needed for payroll, benefits and expenses purposes;
 - contact and emergency contact details;
 - records of holiday, sickness and other absence;
 - information needed for equal opportunities monitoring policy; and
 - records relating to your career history, such as training records, appraisals, other performance measures and, where appropriate, disciplinary and grievance records
 - any other information relating to your employment with us.
- vi. You MAY be referred to in company documents and records that are produced by you and your colleagues. You should refer to the Data Protection Policy which is available within the Staff Handbook.
- vii. We may hold information relating to your health, including reasons for absence and GP reports and notes. This information will be used in order to comply with our health and safety and occupational health obligations. This information may also be used to consider how your health impacts your ability to do your job and whether any special measures might be appropriate. We will also need this data to administer and manage statutory and company sick pay and all other relative benefits contained within our Benefits Pack.
- viii. In some circumstances we may process special categories of information including:
- your racial or ethnic origin;
 - political opinions, religious and philosophical beliefs;
 - trade union membership;
 - biometric data; or
 - sexual orientation

We will always obtain your explicit consent to process this type of information unless this is not required by law or the information is required to protect your health in an emergency. Where we are processing data based on your consent, you have the right to withdraw

that consent at any time.

- ix. We monitor computer and telephone use, as detailed in our Staff Handbook.
- x. Other than as mentioned below, we will only disclose information about you to third parties if we are legally obliged to do so or where we need to comply with our contractual duties to you, for instance we may need to pass on certain information to our external payroll provider, pension or health insurance schemes.
- xi. We may transfer information about you to other group companies for purposes connected with your employment or the management of the company's business.
- xii. In limited and necessary circumstances, your information may be transferred outside of the EEA or to an international organisation to comply with our legal or contractual requirements. In the event that we need to make a transfer we will implement safeguards to ensure the security of your data.
- xiii. Your personal data will be stored for as long as is necessary or for a period of 6 years from the date of termination of employment, whichever is longer.
- xiv. If we intend to process your personal data for a purpose other than that which it was collected we will inform you of that purpose and any other relevant information.

2. YOUR RIGHTS

- i. Under the General Data Protection Regulation (GDPR) and The Data Protection Act 2018 (DPA) you have a number of rights with regard to your personal data. You may have the right to request from us:
 - Access;
 - Rectification;
 - Erasure;
 - Restriction of processing; and
 - Data portability.

You also have the right to object to processing.

These rights can be exercised without charge unless the request is excessive.

- ii. Where consent is our basis for processing of your data you have the right (in certain circumstances) to withdraw that consent at any time. Withdrawal of consent will not affect the lawfulness of the processing before your withdrawal.
- iii. You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with our data protection obligations under the GDPR or DPA with regard to your personal data.

3. IDENTITY AND CONTACT DETAILS OF CONTROLLER AND DATA PROTECTION OFFICER

- i. Capital Maintenance Limited is the controller of data for the purposes of the DPA and GDPR.
- ii. If you have any concerns as to how your data is processed you can contact:

Scott Hunt at Scott.H@CapitalMaintenance.Ltd

Alternatively, you can write to these individuals using the address of 1ST Floor Rear, 207-209 Regent Street, London W1B 4ND.

1.4 NO SMOKING POLICY

Smoking in the workplace or in a company vehicle is a criminal offence under the Health Act 2006. The Company has a legal duty to ensure, as far as is reasonably practicable, that employees and visitors to the Company's premises have the right to work or visit without being exposed to tobacco / vape smoke.

This policy applies to all employees, visitors and contractors and is part of the Company's commitment to the health, safety and wellbeing of its staff and visitors.

Smoking is prohibited at all times:

- within any part of all of the Company's premises; and
- within all vehicles owned and operated by the Company.

No smoking signs will be clearly displayed at the entrances to and within the workplace and in the Company vehicles.

Smoking will be permitted outside in designated areas. Employees who smoke in the designated areas must dispose of cigarette ends and other rubbish in the bins provided.

Employees must ensure that the length and frequency of smoking breaks does not have an adverse effect on their performance or the business.

Smoking in prohibited areas will be regarded as a gross misconduct offence. Non-compliance with this Policy may lead to disciplinary action up to and including summary dismissal in accordance with the Company's Disciplinary Procedure.

Employees are warned that smoking in prohibited areas is a criminal offence.

Staff wishing to register a complaint regarding an incident of non-compliance with this policy may do so by contacting their immediate Manager or the Office Manager. Alternatively, any issue regarding the application of or non-compliance with this policy can be raised through the Company's Grievance Procedure.

1.5 EXPENSES POLICY

INTRODUCTION

This document outlines the policy which applies to the reimbursement of expenses incurred by employees when engaged on Company business. These guidelines are designed to provide for the reimbursement of reasonable out-of-pocket expenses wholly, exclusively, necessarily, and actually incurred by an employee engaged on the lawful business of the Company.

EXPENSE CLAIMS

Expense claims should be made on the appropriate expense claim form. The form must be completed and signed by the employee, countersigned by the employee's line manager, and then submitted to the Accounts Department. The expense claim process is paperless, all expense claim forms and receipts need to be submitted to the Accounts Department via email.

Employees should ensure that all expense claims are made promptly and at the latest within [four weeks] of incurring the expense, and in any event, within seven days of the end of the Company's financial year, which is the 31st of August, where the expenses relate to that financial year. Any claims which are submitted out of time will not be met by the Company.

The Company will pay claims for authorised expenses by BACS transfer into the same bank account into which an employee's salary is paid.

PROVISION OF RECEIPTS

For audit purposes, employees must provide original VAT receipts for expenditure incurred where this is reasonably possible (which include the date, time, and nature of the transaction). Where it is not possible, the employee must give a detailed description of the expenditure incurred on the expense claim form.

The Company may return an expenses claim form to an employee without payment if it is completed incorrectly or lacks supporting evidence.



ADVANCE OF EXPENSES

It is not the policy of the Company to advance expenses.

SUBSTINENCE ALLOWANCE

Overnight accommodation

Employees who are required to stay away from home overnight on Company business may claim the full costs of overnight accommodation (i.e., dinner, bed, and breakfast) at an appropriate hotel or guest house approved by their line manager.

Personal incidental expenses

Items of a personal nature such as alcoholic drinks, newspapers, private telephone calls or laundry will not be reimbursed by the Company.

Meals in other circumstances

Employees who are required to leave the office on Company business, but who are not staying away overnight, may claim the reasonable cost of meals against original VAT receipts. Meal allowance guidelines per person per day (inclusive of VAT) are as follows:

Breakfast	£ 5
Lunch	£ 5
Dinner	£ 10

TRAVELLING ALLOWANCES

Definition of business travel

The Company will reimburse travelling expenses which are necessarily incurred for business purposes. In determining what constitutes a business journey, the following apply:

Employees whose normal base is at the Company's offices

Journeys from the office

Business journeys from the office, e.g., to visit a customer or to visit a site, via public transport will be covered by the company by a prepaid travel card or the costs of the journey will be reimbursed to the employee when the appropriate receipt is provided, and an expense form is completed.

Journeys from home

Journeys between an employee's home and normal work base are considered private and do not constitute business travel. Under no circumstances should employees claim the cost of their journeys from home to their normal place of work. All journeys from home on business may be regarded as business except as stated below.

In certain circumstances, it may be necessary for an employee to start or finish a journey from home. In these circumstances, the employee may claim only the lesser of:

- a) the distance actually travelled, and
- b) the distance which would have been travelled if the employee had started or ended the journey at their normal place of work.

The Company will not reimburse the cost of any travel undertaken for personal reasons.

Fines and penalties

The Company is not responsible for any fines or penalties which the employee may receive while on Company business, for example speeding and parking fines or clamping and vehicle recovery charges. The responsibility for paying such fines or penalties rests with the employee.

The Company will, however, reimburse toll charges, congestion charges and parking costs.

Rail and coach travel

Employees required to travel on Company business by rail or coach may claim the full costs of standard class rail or coach fares.

Where possible, rail or coach travel should be booked well in advance to benefit from any discounts for early booking.

Air travel

All domestic and European flights will be booked economy class or its equivalent.

Where possible, air travel should be booked well in advance to benefit from any discounts for early booking.

Taxi fares

Employees may claim the cost of taxi fares where suitable public transport is not available, or where there are several employees travelling together to make this more cost effective than public transport.

STAFF ENTERTAINING

Only senior managers are permitted to claim back reasonable expenses incurred for staff entertaining. Where this occurs, full details of the expenditure must be shown on the expense claim form and original receipts must be provided where this is reasonably possible. Details of the employees who were entertained must be shown, together with the reason why the event happened.

BUSINESS ENTERTAINING

Business or client entertaining means hospitality of any kind provided by the Company or its staff to non-Company employees in connection with the lawful business of the Company. All business entertaining expenses which are likely to be above the sum of – Managers Level - £100, Senior Level - £250, Director Level - £1000 (Managing Director to approve for Director Level if above) (inclusive of VAT) must be approved in advance by a Director of the Company. In addition, the employee's line manager must agree to the level of any business entertaining expenditure in advance, before the commitments are made, taking into account what is reasonable and proportionate in all the circumstances.

Employees should be aware that business entertaining may amount to bribery, which is a criminal offence, where the person offering the hospitality intended the recipient to be influenced to act improperly. This is most likely to be the case when the hospitality is lavish, excessive, extraordinary, or unreasonable.

Full details of business entertaining expenditure must be provided on the expense claim form, including the reason why the expenditure was necessary, the names of the persons being entertained, the companies they represent, and a breakdown of the expenditure incurred. Original receipts must be provided where this is reasonably possible.

All business entertaining expenditure will be closely monitored by the Company.

OTHER EXPENSES

Employees should seek the prior approval of their line manager before incurring other expenses.

FALSE CLAIMS

If the Company considers that any expenditure claimed was not legitimately incurred on behalf of the Company or is a false expense claim, it may request further details from the employee. The Company will check and investigate any expenses claim as it sees fit.

Any abuse of this policy will not be tolerated, and action will be taken where appropriate under the Company's disciplinary procedure. Depending on the circumstances, the Company may treat a breach of this policy as potential gross misconduct, which may render the employee liable to summary dismissal. In addition, the Company may report the matter to the police if there is evidence to suggest that a criminal offence may have been committed.

The Company will process the personal data collected in connection with the operation of the reimbursement of expenses policy in accordance with its data protection policy and any internal privacy notices in force at the relevant time. Inappropriate access or disclosure of personal data will constitute a data breach and should be reported immediately to the Company's Data Protection Officer Scott Hunt in accordance with the Company's data protection policy. Reported data breaches will be investigated and may lead to sanctions under the Company's disciplinary procedure.

SECTION 2 – HEALTH AND SAFETY

2.1 HEALTH AND SAFETY POLICY

STATEMENT OF INTENT

Capital Maintenance Ltd provides proactive and reactive maintenance, full refurbishment, fabrication works, and passive fire services to commercial and residential clients within central London and surrounding areas.

We are committed to reducing any adverse health and safety outcomes during our operations. We will ensure compliance with the Health and Safety at Work Act 1974 and all statutory instruments enacted by it. We will also consider relevant standards, guidance, and industry best practices during our decision-making processes.

Our Managing Director has ultimate responsibility for the health and safety of our employees and those who may be affected by our operations.

We will provide, so far as is reasonably practicable:

- Safe plant and machinery
- Safe systems of work
- Safe handling, storage, and use of substances
- Information, instruction, training, and supervision
- Safe access and egress
- A safe working environment

We acknowledge that safety is an inclusive process and that all employees have a responsibility for their own health and safety, and that of others who may be affected by their actions or inactions. We will provide all employees with sufficient training to enable them to make informed decisions regarding their actions. Our employees are empowered to avoid unsafe conditions and report unsafe acts so that we can prevent accidents, incidents, and ill-health to themselves and others who may be affected.

We will encourage our service partners to adopt best practices during their operations while under our undertakings.

We will ensure that all adverse incidents are recorded, investigated, and, where necessary, reported to clients and enforcing bodies.

We will implement procedures and processes to reinforce our commitment to operating in a safe and responsible manner.

We will review our Health and Safety Management procedures and processes through our internal audit process and regular management reviews. This policy will be reviewed annually.

Responsibility for the day-to-day management of the Health and Safety Management System is delegated to the HSQE Manager.

This policy will be communicated to all Employees through our staff notice board and is available on the Capital Maintenance Ltd Quality Management System Shared folder

RESPONSIBILITIES

Managing Director

The Managing Director has overall responsibility for the health, safety and welfare of our Employees and is committed to ensuring that all reasonably practicable measures are taken to maintain a safe working environment.

HSQE Manager

The HSQE Manager has been appointed to manage the day to day health and safety management within the organisation. The HSQE Manager is responsible for developing and maintaining the Health and Safety policies, procedures and processes that support the organisation in maintaining safe working practices.

Directors, Operations Managers and Contract Managers

Are responsible for ensuring that the teams that they manage, comply with the requirements of this policy and any supporting procedures or processes, that they operate in a safe manner and that they comply with any client health and safety policies, procedures or processes.

Employees

All Employees have a duty to comply with the requirements of this policy and to co-operate with the Organisation to allow it to discharge its duties under the Health and Safety at Work Act 1974 and the Regulations enacted under it.

They have a duty to report unsafe acts and activities to their Line Manager or other person so that preventive measures can be implemented.

All Employees have the authority to prevent or suspend work if they consider the activity is unsafe or requires additional control measures to reduce the likelihood of harm to other employees or third parties.

All Employees have a statutory duty to take all reasonable care of themselves and others who may be affected by their acts or omissions, and failure to discharge these duties could result in prosecution of the Employee and or the Organisation.

ARRANGEMENTS

Consultation with Employees

Capital Maintenance has ensured that it has effective communication with all its employees, this ensures that we have a shared understanding of the Health, Safety and Welfare requirements that provide a safe place of work.

Consultation is achieved through regular team meetings, which includes works planning, emails, briefings and toolbox talks. We will ensure that suitable translations are provided to those employees whose first language is not English.

Risk Assessment and Method Statements

Capital Maintenance Ltd has duties under the Management of Health and Safety at Work Regulations 1999 to make a suitable and sufficient risk assessment of the risks to its Employees and those not in its employment arising out of or connected to its operations. Risk Assessments will be reviewed if the assessment is no longer valid or if the process has a significant change which increases the risk or introduces new risks.

The risk assessment will be supported by a Method Statement, this document will provide the Employee and third parties with a sufficient description of the planned works and the measures that will be implemented to manage the risk. Method statements can be used during work briefings to ensure that all Employees are aware of the actions to be taken during the task and provide information on the processes to support the Employee in the event of an Adverse Incident.

Risk assessments will be produced by the Health and Safety team, using the Evalu8 programme which allows the Organisation to generate suitable and sufficient risk assessments with supporting method statements. A document review will be completed before issue to ensure that all significant risks have been identified and suitable preventive measures implemented to control those risks. Risk assessments and Method Statements will be provided to all relevant interested parties.

Specific risk assessments will be carried for Employees who are pregnant or have recently given birth or are deemed to be a young person (under the age of 18)



MANUAL HANDLING

Manual Handling related injuries can have life changing outcomes and therefore the Organisation shall identify manual handling risks during the risk assessment process. We will ensure that suitable control measures are implemented to prevent adverse outcomes during manual handling. Employees must adhere to preventive measures implemented by Capital Maintenance Ltd; employees must also prevent unsafe acts and bring them to the attention of the organisation. We will provide employees with the necessary training to ensure that manual handling activities are carried out safely.

We will ensure that the capability of the Employee is considered before assigning a task that involves manual handling.

PROVISION AND USE OF WORK EQUIPMENT

Capital Maintenance will ensure that all work equipment is suitable for the intended use, and where applicable a maintenance record is established and maintained for that equipment.

Equipment that requires inspection, tests, calibration or checks, includes:

- Ladders
- Portable scaffolds

- Podium step up
- Desk surfers
- Safety Harnesses
- Safety lanyards
- Portable Electrical Equipment
- PAT testers

Inspection frequencies will be performed as required by a Statutory Requirement, a relevant Standard, the Manufacturers requirement or a Capital Maintenance Ltd requirement.

All Employees will carry out pre-user checks on equipment that requires one to ensure safe operation.

PORABLE ELECTRICAL APPLIANCES

All portable electrical appliances will be inspected and or checked in line with current guidance, we have established a procedure which states the frequencies

Thorough In Service Inspection and Testing (PAT testing) will be carried out in line with HSG 107 (third Edition) table 1.

Equipment used in low-risk environments will be inspected in line with INDG 236.

CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH

All substances used by Capital Maintenance Ltd will be afforded a CoSHH Assessment, these assessments are generated using our on-line programme (Evaluate8)

Flammable and highly flammable substances will be stored in a suitable metal storage cupboard which will remain locked, the key for the cupboard is obtained from the office manager, the key will be signed for.

Other products will be stored on purpose made shelving within the store room taking into consideration any separation or storage specific requirements.

Users of substances and articles will be provided with the necessary information to allow them to be used safely. They will not be stored in areas where third parties can easily access them, unused substances or partly used substances will be returned to the stores.

Disposal of unused substances will be arranged through the most appropriate waste stream or removed from the stores via an authorised waste carrier who will provide a waste transfer note.

FIRE PREVENTION

Capital Maintenance Ltd will ensure that it complies with the duties of the Regulatory (Fire Safety) Order 2005.

We will ensure that:A fire risk assessment is completed and maintained for the areas under our control.

- Flammable and highly flammable substances are stored within a suitable metal cupboard and that sources of ignition are prevented.
- Visitors to our premises are controlled and that they sign in at our reception.
- We have nominated fire wardens on duty.
- All Employees are aware of the measures we have drawn up to support our emergency planning process.
- Co-Operate with property management team to ensure we allow them to discharge their duties.
- Fire extinguishers are suitably located and maintained.

All Employees have a responsibility to prevent adverse incidents which may result in a fire, you must ensure that you use equipment and substances in the appropriate manner, switch off electrical appliances when not in use, request and adhere to hot work permits. You must also avoid “daisy chaining” extension leads and consider the overall amperage of connected equipment.

You must also report any defective electrical equipment that is or shows signs of overheating.

DISPLAY SCREENS AND EQUIPMENT

Capital Maintenance Ltd will ensure that all work station users are assessed to ensure that the equipment they are using is suitable for their use and does

not exacerbate any health condition that the user has. We will ensure that DSE users are provided with sufficient training to allow them to operate the equipment safely and make adjustments to that equipment to allow the user to maintain a healthy work position.

We will ensure that users of Display Screen and equipment can achieve and maintain a good working posture, that breaks or changes to the activity are implemented to prevent stiffness, injuries and ill health through inactivity.

DSE user's will be provided with an eye test if they request one and provide glasses specifically for DSE use if required.

HAND ARM VIBRATION SYNDROME (HAVS)

Capital Maintenance Ltd will ensure that tools provided by them present a low risk of HAVS, we will not use pneumatic concrete breakers. Users of hammer drills will not use them for more than an hour per day and ensure that SDS chisels are in good condition. If extended work is required, then the task will be assigned to a team to allow works to be divided up. Users will take frequent breaks during use 15mins use, 15 minute break from use.

Team leader will ensure that they use the most appropriate equipment to reduce exposure.

Employees will report any instances of

- tingling and numbness in the fingers
- Lack of touch sensation
- Fingers going white and turning red and painful on recovery (particularly in the cold and wet)

ELECTRICITY AT WORK

All works on electrical systems will adhere to the requirements of the Electricity at Works Regulations 1989 (EaWR 1989) PTWs will be issued by clients

All works on electrical systems will be carried out on systems that have been isolated and where necessary de-energised and proven to be dead. Works on live systems are only permitted for the purpose of testing or fault finding.

Works on electrical systems will only be carried out by Employees or Contractors who are competent to do so.

A site specific risk assessment will be completed for all works on electrical systems

WORKING AT HEIGHT

Capital Maintenance Ltd will ensure that all working at height is afforded a suitable and sufficient risk assessment to ensure that all adverse incidents are avoided. Employees must adhere to the control measures identified within the risk assessment ensuring that where applicable they work in fall arrest or fall restraint.

Working in fall arrest requires the employee to work where they may fall but their PPE will arrest that fall and prevent them falling further.

Working in fall restraint will ensure that the employee cannot reach the point at which a fall is possible. Employees must ensure that they have the correct PPE for arrest or restraint.

Work at height will only be carried out where it cannot be avoided, we will adopt the hierarchy of control when working at height.

All employees who are engaged in work at height will be provided with the necessary training to allow them to work safely, they will not use equipment that if they are not trained to use it.

We will provide them with them with the required personal protective equipment (PPE) and equipment to work safely at height. Users of working at height PPE will be trained to inspect, maintain and use it safely

Users will perform pre-use checks on:

- Ladders
- Portable scaffold towers
- Podium step ups
- Desk surfers
- MEWPS

When using a MEWP, eyebolt, tower scaffold, desk surfer, podium or safety

wire the users must check that it is within date of its thorough examination scheme. Employees will not use any such equipment that does not display a current test date.

LONE WORKING

Lone working is a permissible activity, providing that it is effectively planned and has suitable control measures that consider the risks are implemented. If the task cannot be completed safely by one person then it must not be carried out.

Tasks that require two or more men include but the list is not exhaustive includes:

- Working at height
- Confined spaces
- Involve heavy lifting
- Require a banksman
- Working near waterways
- Using equipment that has the potential of cutting injuries
- Young or Inexperienced workers.

A lone worker risk assessment will be completed where there is a significant risk of injury or an inability to summon aid.

Lone workers risk can be mitigated in some instances using planned communication via mobile phone or FM radios. Lone worker devices that summon emergency assistance using GPS can also be utilised.

Lone workers will be afforded training to ensure that they understand when to request assistance, what jobs can be completed by a lone worker and what hazards may be encountered during lone working.

Lone workers will be appropriately supervised, this will include the lone worker contacting the supervisor or manager to confirm the lone working activity has commenced and when it has been concluded.

FIRST AID

Capital Maintenance Ltd will ensure that suitable levels of first aid is available to all employees, first aid in the office environment is provided by either a trained first aider or an appointed person.

Employees working on client sites or external locations will be provided with information on how to access first aid assistance, this can be:

- A client-based 1st aider or appointed person
- Using the emergency services by dialling 999 or 112 (emergency)
- Using 111 for non-emergencies such as minor injuries.
- The location of the nearest A&E department
- The location of the nearest minor injuries unit

ADVERSE INCIDENTS

An adverse incident is defined as any incident which has a negative outcome:

- Accident
- Near Miss
- Dangerous Occurrence
- Work related ill health.
- Property Damage
- Spillage of substance or product
- Anything that has the potential to affect the corporate image

All of the above incidents must be reported to the Employees line manager, who will forward the report to the HSQE Team to establish what level of investigation is required and by whom.

RIDDOR reports will be completed by the HSQE Team, it is vital that Employee accidents are notified to the HSQE team to ensure that the reporting requirements of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) are adhered to. A full list of the requirements is established within the Adverse Incident Procedure V1.

HEALTH AND SAFETY MEETINGS

Capital Maintenance Ltd will hold planned health and safety meeting with

departments and include health and safety in our Management Review process.

Meeting will include Inputs from an agreed agenda and the outputs from that meeting, minutes of the meeting will be generated and circulated to those who require it or are identified for actions through inputs and outputs.

The agenda for the meeting shall include:

- Accidents
- Near Misses
- Lost time
- The outcome of Adverse incident reports.
- Sub-contractor performance
- Risk assessment reviews
- Workplace reports
- Workplace changes
- Process Changes
- Review of Toolbox talks process and contents
- Future mailshots and campaigns
- Review of outstanding actions
- AOBs

CONSTRUCTION DESIGN MANAGEMENT (CDM)

Capital Maintenance Ltd will comply with the duties placed upon it by the CDM Regulations 2015, these regulations place duties on various entities within the construction industry.

Capital Maintenance Ltd invariably act as the Principal Contractor or Contractor, this will be established during the works planning process.

All works will be afforded a risk assessment and all hazards will have suitable control measures implemented, these assessments will be supported with method statements and where necessary CCPs (Construction Phase Plans)

We will implement toolbox talks for all employees on a regular basis, safety meetings and briefings will also be held.

We will ensure that works are suitably supervised and audited on a regular basis.

We will not accept breaches of our health and safety policy, procedures or processes.

Principal Contractor duties include:

- Organising co-operation between contractors
- Ensuring that site inductions are performed and recorded
- Taking steps to prevent unauthorised access
- Consulting with workers to ensure that they are aware of the measures we have taken and the measures they need to take.
- Provide suitable welfare arrangements
- Prepare a Construction Phase Plan detailing the works and the arrangements.

Contractor Duties Include

- Co-operating with the Principal Contractor and comply with directions and instructions
- Prepare a CPP detailing the works and the arrangements where we are the single contractor
- Co-operating and co-ordination our activities with other contractors.

Workers

Our employees must take care of their own health and safety and of others who may be affected by their actions.

They must also report any unsafe situations which endanger them or other persons and they must co-operate with other workers, both internal and external and the dutyholder for the works.



TRAINING

All Employees will receive a thorough induction to the organisation, training will include:

- Health and safety requirements of the Organisation.
- Fire Safety training (evacuation)
- First aid provision
- Welfare provision
- Job specific requirements

Employees will also be afforded the necessary training to allow them to perform their duties competently and safely.

Training will be provided for tasks or operations that require training under a regulation such as Construction Skills, PASMA, IPAF and other training bodies. With refresher training planned for certification that is time bound.

We will discuss any training with the employee with consideration towards the capabilities of Employee before providing training.

We will also ensure that training for Employees whose first language is not English is provided in a language they can understand or we will arrange for training to be adapted into a format that can be comprehended by the trainee

DRUGS AND ALCOHOL

Capital Maintenance Ltd employees will not attend client sites or work areas whilst under the influence of alcohol or drugs this includes prescribed drugs that may affect the cognitive awareness or ability of the employee to remain alert to hazards and obvious danger. Drugs and alcohol also lower the inhibition of the person, which can result in an employee performing unsafe acts.

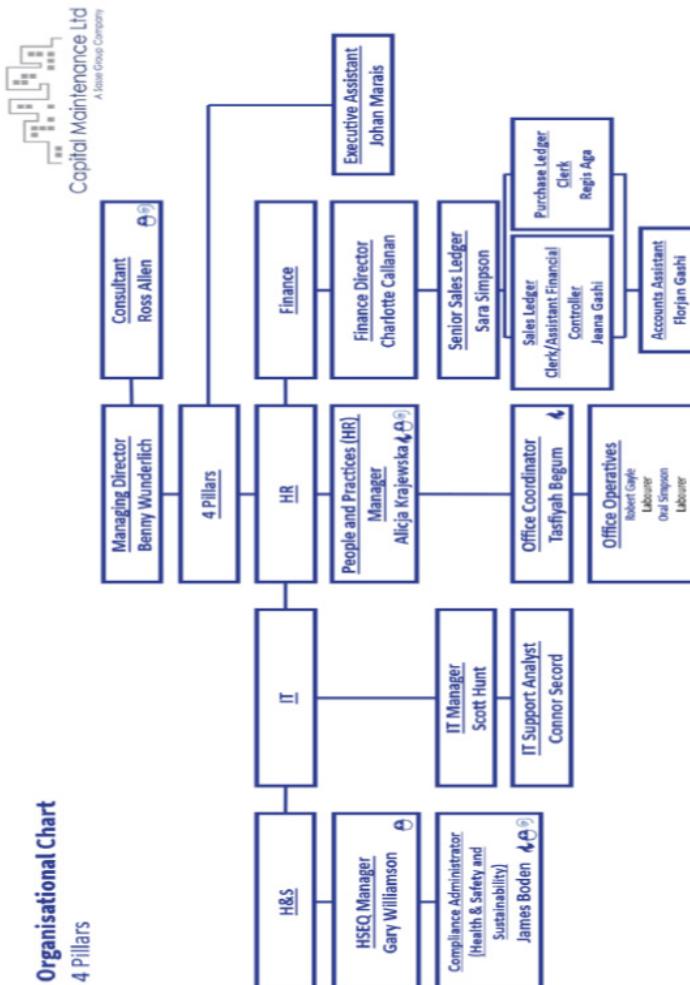
Employees will not provide other Employees with drugs as identified above whilst at work or encourage the use of such substances.

Employees must not consume any drug or products that are deemed to be illegal under the Misuse of Drugs Act 1971 classes A, B or C whilst at work.

Drug and Alcohol consumption can be considered as gross misconduct.

Organisational Chart

4 Pillars



First Aider

Mental Health First Aider

Fire Warden

CAPITAL MAINTENANCE LTD STAFF HANDBOOK

Property Services		The Crown Estate/JLL	
Project		4 Pillars	
Dilapidation		John Marais Breakfast@8	
Finance		Mike Alderman Finance Manager	
IT		Sam Simpson Senior Data Analyst	
Residential		Rajiv Goel Project Manager	
H&S		Jenna Goldi Mentored Practitioner	
Commercial		Bradley Tye Senior Accountant/Analyst	
Compliance		Sally Van Dam Senior Account Manager	
Technical Service		Sarah Ferguson Senior Technical Analyst	
Risk		Charlie Taylor Strategic Risk Manager	
People		Seán Ó Domhnall Head of People & Culture	
Office		Adam-Robert Imon Essex	
Clients		Brett McLean Senior Accountant/Analyst	
Business		Scott Hart Innovation & Technology	
Marketing		Patricia Witzack Senior Account Manager	
Operations		Sarah Bradburn Account Manager	
Finance		Luke Paré Financial Analyst	
HR/Office		Charlie Davis Account Manager	
Clients		Rebecca Hall Head of Operations	
Business		James Boden Growth Strategist	
Marketing		Alicia Kriegel Project Management Manager	
Operations		Adam Simmonds Technical Support	
Finance		Tashif Begum Office General	
Clients		Lorraine Hall Retailer	
Business		Sarah Hall Customer Experience	
Marketing		Natalie Hall Customer Experience	
Operations		Kathy Hall Customer Experience	
Finance		Samantha Hall Customer Experience	
Clients		First Aider Fraud Watcher	

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2.2 CONTROL OF CONTRACTORS POLICY

INTRODUCTION

The purpose of this policy is to provide information and guidance to all contractors/sub-contractors who engage with work and services on behalf of Capital Maintenance Ltd. It ensures that contractual arrangements comply with Capital Maintenance Ltd.'s policies and procedures, statutory health and safety legislation and contracted obligations. It also sets out information for those who are directly involved in engaging/employing contractors.

Capital Maintenance Ltd recognises its responsibilities in accordance with the Health and Safety at Work Act 1974 for managing contractors working on their behalf on client's sites and elsewhere.

SCOPE AND IMPLEMENTATION

Capital Maintenance Ltd as an organisation employs sub-contractors to undertake a wide variety of work primarily on clients' sites. This policy is applicable to all those services that engage directly with or employ contractors.

Prior to any commencement of sub-contractor works, the following compliance must be acknowledged and adhered to. Checks where necessary will be undertaken by the Team Managers and they are mandatory for all sub-contractors.

- Continually satisfy the membership requirements of either the Safe Contractor scheme or an alternative scheme determined by the Capital Maintenance Ltd at the contractor's cost.
- Ensure their workforce is adequately trained, qualified, and experienced for the tasks they undertake.
- Authorised only to carry out work if a CJ number has been provided. The payment of invoices will be withheld until the CJ number is clearly stated.
- Must maintain and supply specific insurance coverage.
- Ensure each job has been carefully considered (planned, controls organised, and performance monitored) and site specific RAMS for each individual job are provided and agreed prior to commencement of works for onward inclusion in to a possible permit to work. This is to minimise the risk of injury to persons or damage to property. Specific high risk works (confined space, working at height, pressure

systems, radiation) will be reviewed by the Health and Safety team.

- Work must not digress from those previously agreed with Capital Maintenance Ltd and as set out on a Permit to Work system and if this becomes necessary, communication must be held with the appropriate Team Manager.
- Agree to always provide and visibly display photo identification whilst working on a client's site and to maintain a presentable appearance with acceptable customer service. Comply with signing in and out systems at any site which requires them.
- Sub-contractors are responsible for supervising their own work in the first instance and to ensure they are working safely. Capital Maintenance Ltd employees do not need to be in attendance at all times. The amount of contact between the sub-contractor and Capital Maintenance Ltd will be agreed at the start of each job and a review will be carried out on completion.
- Should any sub-contractor find what they suspect to be asbestos containing materials, they must stop work immediately, leave site and contact the Team Manager at Capital Maintenance Ltd who will liaise directly with the Health and Safety Manager.
- Sub-contractors must ensure they are aware of the emergency evacuation procedure and emergency points when working on site and these will be discussed with the Team Manager and any on site client representative. Fire escapes must be kept clear at all times.
- All sub-contractors must ensure that rubbish and excess equipment and materials do not accumulate in the immediate work area and are disposed on or off-site with prior authorisation. Tools and equipment must be left in a tidy manner. Under no circumstances whatsoever must any waste, chemicals or other substances be disposed of into drains.
- On completion of works, the handover of a detailed job sheet (accompanied by photographs from before and after the works) must be submitted prior to the acceptance of any sub-contractor invoices.
- The relevant CJ (job) number or CE (quote) number must be included on all paperwork and invoices sent to Capital Maintenance Ltd by hard copy or email.
- Invoices must include a clear breakdown of all materials used and labour for all completed tasks.
- Send a monthly statement of account to Accounts@capitalmaintenance ltd.com to avoid delay in payment processing.

- Send invoices to Accounts@capitalmaintenance ltd.com which must clearly state the date of attendance for work performed.

MONITORING AND REVIEW

The Risk Assessments and Method Statements will be checked by the Team Managers before any sub-contractor works commence to ensure they are relevant to the tasks/location/environment. Subsequent meetings and reviews will be held as required on a job-by-job basis to ensure the effectiveness of any risk controls put in place by the sub-contractors and to ensure all works are proceeding safely and effectively/on time.

In the event of any adverse situation, the sub-contractor will carry out any initial report and investigation and provide an update and findings back to the Capital Maintenance Team Manager. Should an issue arise that is severe, they must report to the Team Manager or the Health and Safety Manager immediately.

The MD and senior management of Capital Maintenance Ltd are committed to the implementation of this policy. It will be reviewed in 12 months or as a result of any changes in risk and/or legislation or new guidance/legal opinion being provided by a Health and Safety professional to Capital Maintenance Ltd.

2.3 CORPORATE SOCIAL RESPONSIBILITY POLICY

INTRODUCTION

Corporate Social Responsibility (CSR) policies aim to guarantee that companies work ethically and consider human rights as well as social, economic, and environmental impacts on what they do as a business. This policy emphasises Capital Maintenance Ltd.'s commitment to ensuring compliance with laws, promoting human rights and proactively supporting community initiatives, environmental conservation and education programmes as much as possible.

SCOPE

This policy applies to all individuals who for us and on our behalf, such as self-employed contractors/sub-contractors. It also includes suppliers and partners.

PURPOSE

As well as a commitment to operate our business in a manner that is both sensitive and responsible, with proper regard to its legal obligations and in accordance with relevant directives, regulations, and codes of practice, we are also committed to supporting the Government's vision for Corporate Social Responsibility, by considering our economic, social, and environmental impacts. This includes the following:

- Promoting business activity that brings simultaneous social and environmental benefits.
- Encouraging innovative approaches and continuing development and application of best practices.
- Ensuring best minimum levels of performance in areas such as health & safety, the environment, and equal opportunities.
- Providing a rewarding, challenging and great place to work.

The policy is broken down into key areas:

- Staff
- Equal opportunities
- Environmental management and objectives

- Ethical purchasing and procurement
- Human rights
- Community Engagement
- Health and Safety

STAFF & EMPLOYEES

Our employees are our most valuable resource, and they are a key factor in the delivery of service to our clients. We recognise that it is the calibre of the people that make up our teams that differentiates us from our competitors. We work hard to recruit, develop, and retain good staff and to ensure everyone is offered the necessary training to help them develop. We recognise their achievements and reward their efforts. We are committed to ensuring that we provide a motivational, rewarding, and fun environment in which to work.

1.EQUAL OPPORTUNITIES

It is the aim of Capital Maintenance Ltd to create an environment that encourages and values diversity within its workforce and builds on the differences individuals bring, enabling the Company's continued success. We aim to draw upon the widest possible range of views and experiences to meet the changing needs of our staff, clients, and partners.

We seek to promote diversity and to respond to the needs of all individuals in a fair and equitable manner, whilst observing our commitment and responsibility to current legislation (including the Equality Act 2010). Our approach to equal opportunities applies equally to both our own employees and the way in which we recruit our team members.

2.ENVIRONMENTAL MANAGEMENT & OBJECTIVES

Whilst Capital Maintenance Ltd does not produce any emissions or pollutants that come under the Integrated Pollution Prevention and Control Regulations, the company has identified that it's most significant impacts on the environment include:

- Disposal & recycling of waste (including paper and consumables).
- Energy & water usage.



- Purchase of consumables.
- Maintenance of buildings.

We are committed to reduce this level of impact through assessing and improving our environmental performance using a documented, monitored and reviewed Environmental Management System that is communicated to all employees.

Through the ISO 14001 we employ systems and procedures that ensure the company's compliance with all relevant laws, regulations and other requirements relating to the environment. Sustainability considerations are fully integrated in our business decision making.

Current practices for meeting the objectives for Environmental Management include:

- Maximising the re-use, recycling, and sustainable disposal of waste.
- Minimising unnecessary energy usage and waste.
- Purchasing consumables in an environmentally sustainable and fair manner.
- Minimising unnecessary water usage and waste.
- Ensuring that buildings are maintained in a manner that minimises environmental impact.
- Carry out efficient printing and photocopying.
- Recycle materials as extensively as possible.
- Use technology, where possible, to lessen the need for travel, including virtual meetings.

ETHICAL PURCHASING & PROCUREMENT

Capital Maintenance Ltd is committed to procuring its works, goods, and services in an ethically and environmentally sensitive way, yet with proper regard to its commercial obligations, ensuring that suppliers deliver to agreed timescales, quality, and cost. Purchasing is undertaken in a manner that offers fair and objective evaluation of offers from all potential suppliers.

HUMAN RIGHTS

Capital Maintenance Ltd is vehemently opposed to the use of slavery in all

forms; cruel, inhumane, or degrading punishments and any attempt to control or reduce freedom of thought, conscience, and religion.

The company will ensure that all employees and contractors are entitled to their human rights as set out in the Universal Declaration of Human Rights.

The company will not enter any business arrangement with any person, company or organisation which fails to uphold the human rights of its workers or who breaches the human rights of those affected by the organisation's activities, in compliance with the Modern Slavery Act 2015.

COMMUNITY ENGAGEMENT

Community engagement is one of the key pillars of corporate social responsibility and one that Capital Maintenance Ltd wholeheartedly supports. As a company, we endeavour to support a range of charities, some chosen by our staff, and we encourage our employees to volunteer for community activities and to show a human face to our business. Listed below is a selection of the events that we have been involved with in recent years.

- Grassroot local football teams sponsorships, 2023 -24: Upminster Park Rover U7'S, Bexley Blades U16 & Hayden Youth U12'S (Main Sponsor)
- Jac Josh, local drama production (Sponsor) (2024)
- Jamboree, local Cubs/Scouts (Main Sponsor) (2022 – 24)
- Harold Wood Primary School, summer event (Main Sponsor) (2021 – 24)
- McMillian Breakfast (Annually) (2020 – 24)
- Christmas Jumper day (Save the Children) (2022 – 24)
- Collection for Afghan and Ukrainian refugees (2021 – 2023)
- Hugo the Helicopter (London Air Ambulance) (2023-24)
- Annual tree sponsoring, replenishing the wood that we use.
- Ad-hoc sponsorships throughout the year for various charities including Cancer Research where the Capital team walked 100k from London to Brighton. (2022)
- Annual Plastic fishing – This is a team building exercise where we invite clients and staff to go up and down the Thames collecting waste/plastic in a 99% recycled plastic boat.
- ReStart & Apprenticeship (try before you commit to a career)

programs (2017 – 2024)

- Summer Street Sustainability Day – the pedestrianisation of Regent Street for one day a year to make people a priority and a fun place for families to visit started in 2013. The initiative also provided an opportunity to improve the external air quality. Each year Capital support the managing agent to build (at speed) a one day set to host visitors at a themed space focused on the many aspects of sustainability associated with Regent Street from biodiversity to recycling, gardening and allotments to eating local and seasonal.

HEALTH AND SAFETY

Capital Maintenance Ltd will do everything that is reasonable and practicable to protect the health, safety and welfare of both our employees and any persons affected by our activities.

The MD, Ross Allen, has overall responsibility for ensuring that we maintain high standards of health and safety and the Health and Safety Manager, Jalil Khasanov, has day to day responsibility. However, all our staff and employees, including sub-contractors, play their part in effectively implementing our health and safety policy.

MONITORING AND REVIEW

Capital Maintenance Ltd reserves the right to amend and/or withdraw this policy from time to time for any reason, including without limitation, to take account of changes in the law, best practice and/or business requirements.

2.4 ELECTRICAL ISOLATION POLICY

INTRODUCTION

The Electricity at Work Regulations 1989 requires every employer to comply with the provisions of the regulations in so far as they relate to matters which are written within their control and within particular circumstances. Capital Maintenance Ltd is committed to the safe working of all employees, contractors and sub-contractors that work on any electrical equipment and services, and this policy is part of that commitment.

ELECTRICAL WORK

When any contractor or sub-contractor carries out electrical isolation works, Risk Assessments and Method Statements must be provided to the Team Manager and Health and Safety Manager of Capital Maintenance Ltd. These will form part of a Permit to Work system. This ensures that there is always a safe system of work in place.

The RAMS must include planning of the works taking into consideration the work to be done, the hazards of the system or equipment to be worked on, the people carrying out their work (their qualifications, experience, and supervision), precautions and system of work to be employed. Notifications that are sent out must be agreed with Capital Maintenance Ltd and their client.

The RAMS must also include all safety equipment to be used including PPE (gloves, glasses, face shields), rubber mats, approved electrical test instruments, insulated tools, and the safety locks.

DEFINITIONS

1. Electrical equipment is defined as anything used, intended to be used or installed for use, to generate, provide, transmit, transform, rectify, convert, conduct, distribute, control, store, measure or use electrical energy.
2. Live means that the equipment in question is at a voltage, by being connected to a source of electricity as for example in normal use. This implies that unless otherwise stated, the live parts are exposed so that they be touched either directly or indirectly or indirectly by means of some conducting object and that they hold any voltage or charge.

3. Charged means that the items acquired a charge either because it is live or because it has become charged by other means such as by static or inducting charging; or has retained or regained a charge due to capacitance effects even though it may be disconnected from the rest of the system.
4. Dead means not electrically 'live' or 'charged'.
5. Disconnected is used to describe equipment or a part of an electrical system which is not connected to any source of electrical energy.
6. Isolated is used to indicate equipment or part of an electrical system which is disconnected and separated by a safe distance (the isolating gap) from all sources of electrical energy in such a way that the disconnection is secure and cannot be re-energised accidentally or inadvertently.
7. Low Voltage is regarded as a voltage exceeding 50v AC or 120v DC between conductors or earth but not exceeding 1000v AC or 1500v DC between conductors or 600v AC or DC between any conductors and earth.
8. High Voltage is regarded internationally as being more than 1000 volts AC, however certain precautions have been applied in the UK to systems energised at over 650 volts. To maintain the same degree of safety this guidance uses the term 'high voltage' where the voltage exceeds 650 volts.

Isolation procedures for safe working on electrical systems and equipment

This guide sets out Capital Maintenance Ltd.'s policy on how you should safely isolate electrical equipment prior to working. It is essential you follow this procedure to prevent both electric shock and injuries due to equipment starting up unexpectedly.

Equipment Required

To safely isolate and lock off a supply, the following equipment is required:

- Isolation padlock & key,
- Multiple worker isolation padlock tag,
- Isolation devices to suit different isolators/MCBs, etc.,
- Warning notices,
- Voltage tester (GS38 Approved),
- Voltage proving unit.

Safe Isolation

1. Obtain permission to start work.
2. Identify the source(s) of supply using an approved voltage indicator and check condition of voltage tester and operation against a known voltage supply.
3. Isolate supply and secure isolation - lock off (multi lock off if multiple workers).
4. Prove circuit dead - use voltage tester and recheck against a known voltage supply.

Check load side of device.

Single Phase- E-L, N-L, E-N

Three Phase- L1-L2, L1-L3, L2-L3, L1-N, L2-N, L3-N, L1-E, L2-E, L3-E, N-E

5. Reprove that the voltage indicators are working correctly.
6. Demonstrate use of lock off kit or company preferred method, retain keys and post ‘caution’ and ‘danger’ notices.
7. Fill out electrical isolation certificate.
8. Take precautions against adjacent live circuits / equipment - if any.
9. Issue permit to work and begin work.

Reinstating Supply

1. Ensure all work is complete.
2. Carry out dead testing of the equipment and circuit.
3. Remove lock off and warning notices (multi unlock if multiple workers).
4. Reinstate supply.
5. Carry out live testing on the circuit.
6. Reinstate all lids and covers.
7. Turn on equipment locally if possible and check functionality.
8. Sign off permit to work, isolation certificate and a minor works certificate if necessary.

An approved voltage indicator or test lamp must comply with the Health and Safety Executive’s guidance note GS38. The approved voltage indicator or test lamp must be “proved” using a known live supply or proving unit before and after use to show it is working correctly.

MONITORING AND REVIEW

Updates, reviews, and subsequent meetings will be held as required on a job-by-job basis to ensure the effectiveness of any risk controls put in place by the sub-contractors and to ensure all works are proceeding safely and effectively and conclude without any harm or damage.

The MD and senior management of Capital Maintenance Ltd are committed to the implementation of this policy. It will be reviewed in 12 months or as a result of any changes in risk and/or legislation or new guidance/legal opinion being provided by a health and safety professional to Capital Maintenance Ltd.

2.5 ENVIRONMENTAL POLICY

Capital Maintenance Ltd provides proactive and reactive maintenance, full refurbishment, fabrication works, and passive fire services to commercial and residential clients within central London and surrounding areas.

We are committed to reducing the adverse environmental impacts created by our operational activities and those of our service partners working on our behalf. We will ensure compliance with all relevant statutory requirements.

Our Managing Director has ultimate responsibility for our Environmental Management System. He will ensure that systems are established, maintained, and that realistic objectives are set to reduce environmental impacts. He will also ensure that the necessary resources are provided to maintain these systems and that we meet our stakeholders' expectations. Furthermore, he encourages our management teams to actively support the aims of this policy and foster a continuous improvement process within the business.

Our Environmental Management System is based on the following objectives:

- Reduction of our consumption of natural resources
- Prevention or reduction of harmful emissions to land, water, and air
- Reduction of waste generation and encouragement of recycling
- Formation of partnerships with other like-minded organisations

Encouragement of our suppliers and service partners to reduce their adverse environmental impacts

Where possible, the use of energy from renewable sources.

We will provide employees with the necessary training to raise environmental responsibility and awareness in support of reducing adverse environmental impacts.

We will promote a responsible attitude towards environmental management during meetings and discussions with our clients, service partners, and suppliers.



We will review our Environmental Management procedures and processes through our internal audit process and regular management reviews. This policy will be reviewed annually.

Responsibility for the day-to-day management of the Environmental Management System is delegated to the HSQE Manager.

This policy will be communicated to all Employees through our staff notice board and is available on the Capital Maintenance Ltd Quality Management System Shared folder

2.6 FIRE EVACUATION POLICY

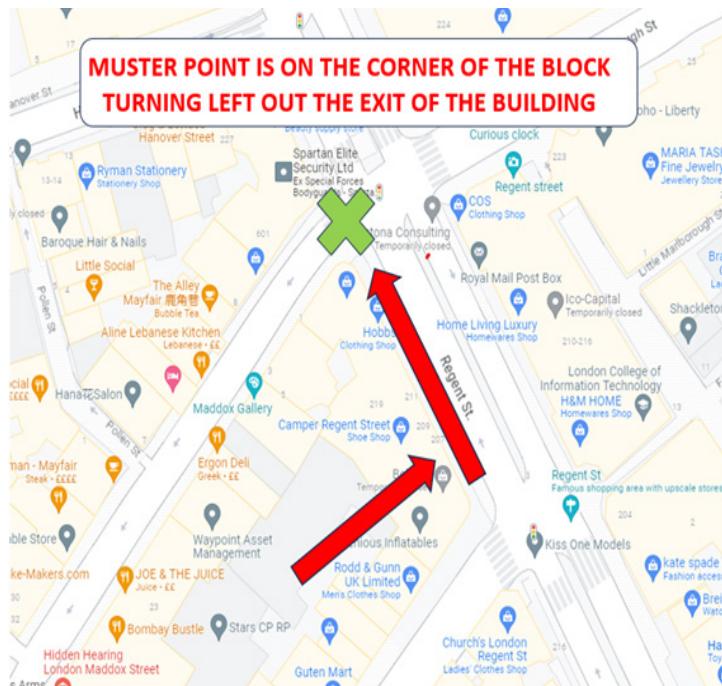
PURPOSE

The purpose of this Fire Evacuation Policy is to establish a comprehensive plan to safeguard the lives and well-being of all occupants and visitors within the offices of Capital Maintenance Ltd at 207 Regent Street in the event of a fire emergency.

SCOPE

This policy applies to all employees, visitors, contractors, and residents within Capital Maintenance Ltd. It outlines the procedures and responsibilities during a fire evacuation.

Muster point location in the event of a fire



FIRE EVACUATION PROCEDURES

If you discover a fire raise the alarm by breaking the glass on the nearest red emergency fire call point and alert others in your immediate area. Telephone the Managing Agent responsible for the building and the emergency services giving exact details of the fire – location, extent of the fire.

1. When the Fire Alarm Sounds:

- Evacuate the building immediately via the nearest safe fire exit route and make your way to the designated assembly point.
- Do not collect personal items or delay your exit.
- Do not use the lifts.
- Do close all doors after you.

2. Exit Routes:

- Familiarise yourself with the locations of primary and secondary evacuation routes.
- Follow illuminated exit signs and evacuation route maps posted throughout the building.
- Lifts will be inaccessible throughout the duration of an evacuation.

3. Assisting Others:

- If you encounter anyone with mobility challenges, offer assistance, or direct them to the nearest safe exit if possible.
- Notify emergency personnel about their location.

4. Evacuation Assembly Point:

- Once outside, proceed to the designated evacuation assembly point located at the corner of the block turning left out of the exit of the building as shown in the map. Make yourself known to the fire wardens who are James Boden and Alicja Krajewska.
- Do not re-enter the building until the “all-clear” signal is given by the emergency response team.

5. Accountability:

- All occupants must report to the designated personnel at the evacuation assembly point for a headcount.
- Do not leave the assembly point until cleared by emergency response personnel, who will determine when it is safe to return to the

building.

- The designated personnel will be responsible for ensuring the building has been fully evacuated, closing all doors behind them on their exit from the building.
- The designated personnel will be responsible for contacting the Fire Brigade in the event of a fire.

The fire alarm bells are tested every Tuesday morning at 10am. These will sound for approximately 10 seconds. If the alarm continues to sound then all staff must evacuate as mentioned above.

EVACUATION DRILLS

Regular fire drills will be conducted by the Managing Agents of the building every 6 months and participation is mandatory for all employees and visitors. The drills will serve to reinforce fire evacuation procedures and assess the effectiveness of the plan.

FIRE MARSHALLS

- Alicja Krajewska
- James Boden
- Tasfiyah Begum

2.7 FIRST AIDER HEALTH AND SAFETY

FIRST AIDER HEALTH AND SAFETY

The Company recognises its obligations under the Health and Safety at Work Act 1974 and as far as reasonably practicable takes every possible step to ensure the health and safety of all employees and visitors to its premises.

The Company seeks the highest standard of health and safety at work with the cooperation of all concerned. Whilst overall policy and responsibility rests at the highest management level, each individual throughout the Company must accept a degree of responsibility for carrying out the policy. The names of the First Aid Officer and the Health and Safety Officer are shown below. All accidents on the Company's premises must be reported to any of the First Aid Officers and recorded in the Accident Book, which is kept with the Office Manager.

GENERAL INFORMATION

First Aid Officer:

Ross Allen
Jalil Khasanov
Gary Williamson
James Boden
Alicja Krajewska
Daniel Sills
Demush Mustafi
Oleg Chiriac
James Chew
Riteche Meggi
Murilo Filus
Iurii Zavadetchii
Vasile Babenko
Liam Bushen

First Aid Kit:

Located in the Main Office on the left-hand side of the entry door.
(attached to the wall)

Health and Safety Officer:

Gary Williamson
James Boden

Mental Health First Aider:

Jalil Khasanov
James Boden
Alicja Krajewska
David Ferguson
Martin Tucker
Ross Allen

2.8 HOARDINGS POLICY

INTRODUCTION

Although there are many types of construction-based materials that could be defined as hoardings, the actual definition of a hoarding is a temporary, boarded, and solid fencing unit that is used in a public setting established around the perimeter of a building or construction site.

The main objective of hoarding is the protection of the public, however hoarding also serves to conceal building works and to display and promote advertisements.

PURPOSE

One of the main purposes of hoarding around any site is the safety and health of the public. The barriers provide an effective separation of the often-dangerous works taking place inside from the public walking around on the exterior of the barriers.

Another aspect is to make the site more secure from intruders who may wish to illegally enter (and potentially steal the materials on the site) and stop unwanted access.

You can control who comes in and out by having a secure perimeter with only a couple of manned entrance points, and you can also use the panels to create safety messages both for the public and those who are working on the building site.

SCOPE

Capital Maintenance Ltd are committed to the safety of members of the public and its contractors/sub-contractors. Safety is at the forefront of all our aims and objectives.

Under 'The Management of temporary works in the construction industry' (HSE, 02/2010), the company has a duty of care to ensure that any temporary structure must be designed, installed, and maintained to withstand any foreseeable loads which may be imposed on it and that it be only used for the purposes of which it was designed, installed and maintained.

Capital Maintenance Ltd has written a checklist which outlines the

requirements for hoarding and boarding broken glass. This checklist must always be followed whilst undertaking hoarding activities. It is held by the Health and Safety team.

In general, Capital Maintenance Ltd is to consider:

- Planning and assessment of the hoarding, including design and layout.
- Preparation and site safety.
- Installation and assembly including the integrity of the hoarding (height, strength, materials, access points).
- Maintenance and inspections.
- Removal and clean up.

Capital Maintenance Ltd will ensure that the hoardings policy particularly in a construction environment will be reviewed on a yearly basis or if there is any change in legislation or best practice.



2.9 INCIDENT MANAGEMENT POLICY

INTRODUCTION

It is Capital Maintenance Ltd.'s policy is to respond appropriately to incidents or circumstances that have caused or may cause harm to any employees, contractors, sub-contractors, or visitors.

An incident reporting, management and investigation process is essential to ensuring that Capital Maintenance Ltd responds to and learns from incidents and this policy lays out the process which facilitates the recognition, management and investigation of such incidents and enables us to learn and minimise any potential for future incidents.

The policy applies to all staff and those contractors employed to work on our behalf providing a clear understanding of responsibilities

RESPONSIBILITIES, ACCOUNTABILITIES & DUTIES

The Managing Director, Ross Allen, takes overall responsibility for health and safety within Capital Maintenance Ltd, however, he delegates day to day responsibility for the reporting and management of incidents, accidents and near-misses to his Health and Safety Manager, Jalil Khasanov.

The Health and Safety Manager, Jalil Khasanov, is the dedicated lead on all incident investigations and reporting and he is assisted by the Health and Safety Administrator, James Boden. It is the responsibility of the Health and Safety Manager to ensure that company learning from incidents takes place through regular H&S meetings and Toolbox talks.

Each employee or contractor working on behalf of Capital Maintenance Ltd has a responsibility to report any incident (or accident or near-miss) to the Health and Safety Manager so that he can then determine the best course of action

DEFINITIONS

Incident

An incident in the workplace is an unplanned event that does not result in injury but does cause damage to property or has enough significant risk to merit recording. Incident management and investigation are triggered by an event.

An incident differs to an accident which is separate, identifiable, unintended incident which does cause physical injury. Cumulative exposures that cause an injury are not classed as an accident.

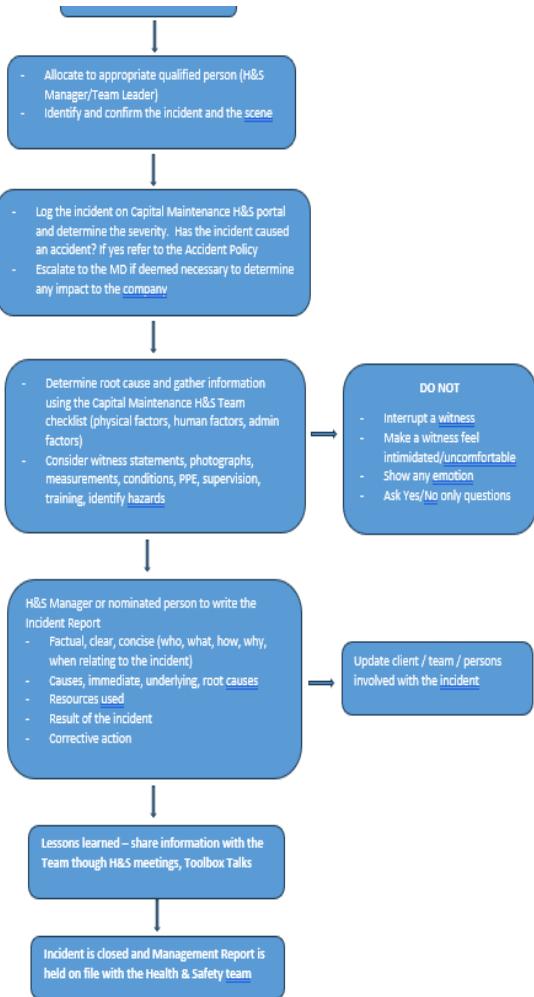
INCIDENT MANAGEMENT

The key steps to Capital Maintenance Ltd.'s incident management plan and policy are:

1. Identify the incident including the scene.
2. Log the incident and determine the severity.
3. Determine the root causes of the incident and gather information.
4. Write up the Incident Investigation Report.
5. Implement corrective actions, both immediate and long term.
6. Communicate and provide updates to all parties involved.
7. Lesson learned and ongoing improvement.

The Health and Safety team use standardised templates to record incidents such as the Incident Investigation Form which generates a report. These are all held with the Health and Safety team.

Please refer to the following flow chart overleaf for further information.



2.10 MENTAL HEALTH AND WELLBEING POLICY

INTRODUCTION

The workplace can positively impact an individual's overall mental health and wellbeing. It provides a sense of identity, intellectual challenge, builds on and develops new skills and can provide a person with a sense of achievement and self-worth. Capital Maintenance Ltd are committed to ensuring that our employment provides all our employees with opportunities to ensure their mental health and wellbeing is supported.

PURPOSE

The aim and purpose of this policy is for Capital Maintenance Ltd to set out how we support our employees' mental health and wellbeing through our workplace practices, and how we encourage staff to take responsibility for their own mental health and wellbeing.

Capital Maintenance Ltd believes that the mental health and wellbeing of our staff is key to organisational success and sustainability.

SCOPE

This policy applies to all employees of Capital Maintenance Ltd including contractors and any interim, temporary, or casual staff. It will be communicated to all staff on a regular basis at our Health and Safety meetings. HR will also cover this as part of a new starter induction and onboarding.

We have Mental Health First Aiders who are currently Jalil Khasanov, James Boden, Alicja Krajewsak, and Dave Ferguson.

RESPONSIBILITIES

The MD, Ross Allen, and the senior management team including the Mental Health First Aiders will provide and maintain a health and wellbeing culture throughout the workplace and adopt a proactive approach towards the prevention of poor health and wellbeing. This includes induction training and work-specific training if necessary.

All employees are encouraged to:

- Understand this policy and seek clarification from management where required;
- consider this policy while completing work-related duties and at any time while representing Capital Maintenance Ltd;
- support fellow workers in their awareness of this policy;
- support and contribute to Capital Maintenance Ltd.'s aim of providing a mentally healthy and supportive environment for all workers;
- take reasonable care of their own mental health and wellbeing, including physical health.

GOALS

The World Health Organisation defines mental health as a “state of wellbeing in which every individual realizes their own potential, can cope with the normal stresses of life, can work productively and fruitfully and is able to make a contribution to their community”. Our goal is to have a positive impact on our employees' mental health and wellbeing. We aim to:

- Build and maintain a workplace environment and culture that supports mental health and wellbeing and prevents discrimination (including bullying and harassment).
- To increase employee knowledge and awareness of mental health and wellbeing issues and behaviours. This will be facilitated by our Mental Health First Aiders.
- To reduce stigma around depression and anxiety in the workplace.
- To facilitate employees' active participation in a range of initiatives that support mental health and wellbeing.
- Take reasonable care that their actions do not affect the health and safety of other people in the workplace.
- Capital Maintenance Ltd are also aware of the impact that stress can have on a person's mental health and wellbeing and if any employee believes they are suffering from the negative effects of stress, we encourage them to speak to our mental health ambassadors or the Health and Safety Manager, Jalil Khasanov.

COMMUNICATION

Capital Maintenance Ltd will ensure that:

- All employees receive a copy of this policy during the induction process;
- this policy is easily accessible by all members of the organisation;
- employees are informed when a particular activity aligns with this policy;
- employees are empowered to actively contribute and provide feedback to this policy;
- employees are notified of all changes to this policy.

MONITORING AND REVIEW

Capital Maintenance Ltd will review this policy twelve months after implementation and annually thereafter. Effectiveness of the policy will be assessed through:

- feedback from workers, the Health and Wellbeing Committee (if applicable), and management
- reviews of the policy by management and committee to determine if objectives have been met and to identify barriers and enablers to ongoing policy implementation.

2.11 QUALITY POLICY STATEMENT

Capital Maintenance Ltd provides proactive and reactive maintenance, full refurbishment, fabrication works, and passive fire services to commercial and residential clients within central London and surrounding areas.

We are committed to ensuring compliance with all relevant statutory provisions, standards, and other requirements. We will conduct our business within the framework of a quality management system that meets the requirements of BS EN ISO 9001.

Our Managing Director has ultimate responsibility for all quality matters. He will ensure that our quality management systems are established, maintained, and that realistic quality objectives are set. He will also ensure that the necessary resources are provided to support these systems. Furthermore, he will ensure that we meet our stakeholders' expectations and adopt a continuous improvement process within the business. He encourages our management teams to actively support the aims of this policy.

Our quality management system is based on the following principles:

- We listen to our customers and potential customers, striving to exceed their needs and expectations in our service delivery. We understand that developing strategic relationships with our customers supports the growth of our business.
- We will consider the requirements of internal and external stakeholders within our decision-making processes.
- Our employees will be provided with the necessary training, encouragement, and support to ensure that their work activities meet the requirements of this policy, satisfy our customers' needs, and help them attain their full potential.

We will review our Quality Management policy, procedures, and processes through our internal audit process and regular management reviews.

Responsibility for the day-to-day management of the Quality Management System is delegated to the HSQE Manager.

This policy will be communicated to all Employees through our staff notice board and is available on the Capital Maintenance Ltd Quality Management System Shared folder

2.12 ROPE ACCESS POLICY

INTRODUCTION

Rope access is a system of working at height where ropes and associated equipment are used to gain access to and from the work position and to be supported there. The primary objective when using rope access methods is to carry out the work efficiently, with minimal accidents, incidents, or dangerous occurrences. It is the policy of Capital Maintenance Ltd to ensure a safe system of work is maintained at all times to avoid damage to property or harm to the environment, careful planning and documented risk assessments are undertaken for each operation.



PURPOSE

The purpose of this Rope Access Policy is to establish guidelines and procedures for working at heights using rope access techniques. This policy aims to ensure the safety and well-being of all personnel involved in rope access activities that are undertaken after all other alternative avenues have been explored (including scaffolding, any/all elevated work platforms (scissor lift/cherry picker etc), ladders and drones) while maintaining efficient and effective work practices. This is known as the Pyramid Effect/Work at Height Hierarchy.

SCOPE

This policy applies to all employees, contractors, and third-party personnel engaged in rope access work within our organisation or on behalf of our organisation. It covers all work activities conducted at heights using rope access techniques, including inspection, maintenance, construction, and other related tasks.

DEFINITIONS

Rope Access: A method of working at heights where workers use ropes and associated equipment to access and perform tasks in difficult-to-reach locations.

Competent Person: An individual who possesses the necessary knowledge, skills, training, and experience to carry out rope access work safely and effectively.

Authorised Person: An individual who has been granted permission by the organization to carry out specific rope access tasks after demonstrating competency and compliance with applicable regulations and standards.

RESPONSIBILITIES

It is the responsibility of each person/s to carry out the following:

1. Management
 - Establish and communicate this Rope Access Policy.
 - Provide the necessary resources, equipment, and training for safe rope access operations.
 - Ensure compliance with relevant laws, regulations, and industry standards.
 - Appoint competent persons to oversee rope access activities and monitor their performance.
2. Competent Persons
 - Conduct thorough risk assessments for each rope access task.
 - Develop safe work procedures and rescue plans.
 - Select and inspect appropriate rope access equipment.
 - Train and supervise authorized persons.
 - Monitor and enforce compliance with this policy and relevant safety regulations.
3. Authorised Persons
 - Undergo proper training and demonstrate competence in rope access techniques.
 - Follow established safe work procedures and guidelines.
 - Use approved personal protective equipment (PPE) and maintain it in good condition.
 - Report any unsafe conditions, incidents, or near misses to the competent person.

GENERAL GUIDELINES

1. Risk Assessment

- Conduct a thorough risk assessment before commencing any rope access work.
- Identify potential hazards, assess their severity and likelihood, and implement appropriate control measures or alternative solutions to undertaking the work leaving Rope access as the final option, implementing the Pyramid Effect system.
- Scaffolding.
- Any / All Elevated Work Platforms (scissor lift / cherry picker etc).
- Ladders.
- Drone assessment.
- Document the risk assessment and make it available to all involved personnel.

2. Training and Competency

- Ensure that all personnel involved in rope access work receive proper training, including theoretical knowledge and practical skills.
- Maintain records of training, certifications, and competency assessments.

3. Equipment/Tools and Inspections

- Use only approved rope access equipment that meets relevant safety standards including PPE.
- Regularly inspect and maintain all equipment to ensure its reliability and safety.
- Replace any defective or damaged equipment immediately.

4. Work Procedures

- Develop and communicate clear and comprehensive work procedures for each rope access task and a communication plan.
- Include detailed steps of the rope access system including setup, use of equipment, safety checks, and emergency procedures (anchorage systems, back-up systems, two rope systems).
- Ensure work zones are established (hazard zone, fall zone).
- Follow established procedures and guidelines at all times.

5. Emergency Preparedness and Rescue
 - Develop and practice rescue plans and procedures for each rope access task.
 - Ensure that all authorized persons are trained in emergency response procedures.
 - Maintain appropriate rescue equipment and conduct regular drills to assess response effectiveness.
6. Compliance and Consequences
 - Post job debriefs are to be conducted for lessons learned or to reinforce the current procedures.
 - Non-compliance with this Rope Access Policy may result in disciplinary action, up to and including termination.
 - Any incidents, near misses, or violations of this policy must be reported immediately to the competent person and investigated accordingly.

POLICY REVIEW & DOCUMENT CONTROL

This Rope Access Policy will be reviewed periodically, or as necessary, to ensure its effectiveness and compliance with changing regulations and industry best practices.

This policy shall be maintained in a controlled document system, with the most current version accessible to all relevant personnel.

2.13 SCAFFOLDING POLICY AND PROCEDURES

INTRODUCTION

This document stands to serve as the comprehensive Scaffolding Policy and Procedure Document for Capital Maintenance Ltd.

At Capital Maintenance, we prioritise the safety and well-being of our employees, contractors, and everyone associated with our operations. This document serves as a guiding framework to ensure the effective implementation of scaffolding practices that align with industry standards, regulatory requirements, and our commitment to fostering a secure working environment.

As a company dedicated to excellence in facility maintenance and construction services, Capital Maintenance Ltd recognises the critical role scaffolding plays in ensuring the success and safety of our work and projects. Whether engaged in routine maintenance, renovations, or new construction, our commitment to the highest standards of safety remains certain.

This document encompasses a wide array of topics, ranging from regulatory compliance and responsibilities to detailed procedures for scaffolding erection, dismantling, inspection, and maintenance. Our objective is not only to comply with local and international standards but to exceed them, setting a benchmark for safety and efficiency within our industry.

All staff are required to read and familiarise themselves with this document, as it serves as a vital resource for understanding our commitment to safety, the procedures in place to achieve it, and the expectations we have for each other in maintaining a secure working environment.

At Capital Maintenance Ltd, we believe that a culture of safety is not only a legal and ethical obligation but also a fundamental component of our operations. By adhering to the guidelines outlined in this document, we collectively contribute to a workplace where every individual return home safely each day.

1.1 Scope

This policy applies to all employees, contractors, and subcontractors involved in property maintenance activities that require the use of scaffolding. The

scope encompasses but is not limited to:

- a. Exterior building maintenance, including painting, repairs, and window cleaning.
- b. Roof maintenance and repairs.
- c. Installation and maintenance of signage and lighting fixtures.
- d. Any other activities involving the use of scaffolding within the scope of property maintenance.

1.2 Definitions

- a. Scaffolding: A temporary structure erected to support workers and materials during the construction, repair, or maintenance of buildings or other structures.
- b. Competent Person: An individual who has the knowledge, training, and experience to identify hazards in the work area and has the authority to take prompt corrective measures.
- c. Qualified Person: An individual with specific training, experience, and certification to design, erect, and inspect scaffolding.
- d. Fall Protection: Measures and equipment designed to prevent, or arrest falls from elevated work surfaces, including guardrails, personal fall arrest systems, and safety nets.
- e. Scaffold User: Any person who uses the scaffold for work, including employees, contractors, and subcontractors.
- f. Scaffold Inspector: An individual designated and qualified to inspect scaffolding for safety compliance.
- g. Platform: The horizontal working surface of the scaffold where workers perform tasks.
- h. Toe Board: A barrier installed along the edge of a scaffold platform to prevent tools and materials from falling.
- i. Guardrail: A barrier erected along an open side or edge of a scaffold to prevent falls.
- j. Load Capacity: The maximum intended load that the scaffold is designed to support, including the weight of workers, materials, and equipment.
- k. Toolbox Talks: Informal safety discussions conducted regularly to address specific safety issues related to scaffolding and other work activities.

These definitions are intended to provide clarity and understanding of key terms used throughout this policy. It is important that all employees are familiar with these definitions to ensure consistent interpretation and

application of the policy guidelines.

REGULATORY FRAMEWORK

2.1 Compliance with Local Regulations

Capital Maintenance Ltd acknowledges and understands the importance of adhering to local and government regulations governing the use of scaffolding in property maintenance activities. This policy is designed to comply with the following regulations and standards, among others:

- a. Health and Safety Executive (HSE)

Working at Height Regulations 2005/BS EN 12811-1:2003

- b. Building Codes and Regulations:

The Building Regulations 2010/BS 8210 Facilities Maintenance Management

- c. Manufacturer's Guidelines: [Compliance with guidelines provided by scaffold manufacturers]

- e. Other Applicable Regulations:

The Workplace (Health, Safety and Welfare) Regulations 1992

2.2 HSE (or relevant safety standards) Compliance

Capital Maintenance Ltd is committed to achieving and maintaining compliance with HSE standards or any other applicable safety standards that govern the use of scaffolding in property maintenance. This commitment includes, but is not limited to:

- a. Scaffold Design and Construction: Ensuring that all scaffolds are designed, constructed, and erected in accordance with HSE standards and manufacturer specifications.

- b. Training and Competency: Providing adequate training to all employees involved in scaffold use and ensuring that they meet the competency requirements outlined in HSE regulations.

- c. Inspections: Conducting regular inspections of scaffolds as required by HSE standards, including pre-use inspections, frequent inspections, and periodic inspections by a qualified person.

- d. Fall Protection: Implementing HSE compliant fall protection measures, including guardrails, personal fall arrest systems, or other approved methods, depending on the specific circumstances.

- e. Documentation: Maintaining accurate and up-to-date documentation of training records, inspections, and any corrective actions taken to address

- identified hazards.
- f. Emergency Procedures: Establishing and practicing emergency procedures in accordance with HSE standards, including evacuation plans and first aid requirements.
 - g. Record-Keeping: Complying with HSE requirements for record-keeping, including retaining records of training, inspections, and incident reports for the specified duration.

Capital Maintenance Ltd will regularly review and update this policy to ensure ongoing compliance with changes in HSE standards or other relevant safety regulations. Employees are expected to familiarise themselves with these regulations and actively participate in maintaining a safe working environment. Non-compliance with regulatory requirements may result in disciplinary action, up to and including termination of employment.

RESPONSIBILITIES

3.1 Management Responsibilities

Capital Maintenance Ltd recognises that the commitment to safety starts at the top. Therefore, management at all levels is responsible for:

- a. Establishing a Safety Culture: Promoting a culture of safety by fostering an environment where employees feel empowered to report safety concerns and actively participate in safety initiatives.
- b. Providing Resources: Allocating the necessary resources, including time, training, and equipment, to ensure the proper implementation of scaffolding safety measures.
- c. Hiring Competent Personnel: Ensuring that individuals responsible for scaffolding design, erection, inspection, and supervision are qualified and competent in their respective roles.
- d. Compliance Oversight: Regularly reviewing and updating safety policies and procedures to align with regulatory requirements. Management will also conduct periodic audits to assess compliance.
- e. Incident Response: Establishing and implementing procedures for responding to scaffolding-related incidents, including reporting, investigation, and corrective actions.

3.2 Supervisor Responsibilities

Supervisors play a crucial role in ensuring the safety of scaffolding operations. They are responsible for:

- a. Training and Communication: Ensuring that employees under their supervision receive adequate training in scaffolding safety and are aware of the policies and procedures in place.
- b. Supervision of Scaffold Activities: Overseeing scaffolding activities to ensure compliance with safety regulations, proper use of equipment, and adherence to established procedures.
- c. Risk Assessment: Conducting thorough risk assessments before the commencement of any scaffold-related work and implementing control measures to mitigate identified hazards.
- d. Toolbox Talks: Conducting regular toolbox talks to discuss specific safety issues related to scaffolding and addressing any concerns raised by the workforce.
- e. Immediate Intervention: Taking immediate action to address unsafe conditions or practices, including halting work, if necessary, until the issues are resolved.
- f. Communication with Management: Reporting to management on the status of scaffolding safety, including any incidents, near misses, or identified areas for improvement.



3.3 Employee Responsibilities

All employees involved in scaffolding activities have a responsibility to:

- a. Training Compliance: Participate in and complete all required scaffolding safety training, including refresher courses as necessary.
- b. Safe Work Practices: Adhere to established safety procedures, including proper use of personal protective equipment (PPE) and fall protection measures.
- c. Report Hazards: Report any unsafe conditions, incidents, or near misses related to scaffolding to their supervisor or the designated safety officer.
- d. Equipment Inspection: Conduct pre-use inspections of scaffolding components and report any defects or concerns immediately.
- e. Follow Instructions: Follow the instructions of supervisors and qualified persons regarding the use of scaffolding, including load limits, capacity, and proper access.
- f. Communication: Communicate effectively with team members and supervisors regarding any issues or concerns related to scaffolding safety.

Capital Maintenance Ltd emphasizes a shared responsibility for safety

among all employees, and non-compliance with safety protocols may result in disciplinary action, up to and including termination of employment. Employees are encouraged to actively contribute to the safety culture by promoting open communication and a proactive approach to hazard identification and control.

SCAFFOLDING DESIGN AND CONSTRUCTION

4.1 Design Standards

Capital Maintenance Ltd is committed to ensuring that all scaffolding used in property maintenance activities is designed and constructed in accordance with industry standards and regulatory requirements. The following guidelines will be followed:

- a. Qualified Designers: Only qualified persons, possessing the necessary knowledge and experience, will be engaged in designing scaffolding structures.
- b. Load Calculations: Scaffold design will consider the intended use, load requirements, and environmental conditions to determine the appropriate load capacity and design specifications.
- c. Compliance with Standards: Scaffolding design will adhere to HSE regulations, local building codes, and any other relevant standards applicable to the specific project.
- d. Professional Engineer Certification: When required by local regulations or the complexity of the project, a professional engineer will certify scaffold designs.

4.2 Inspection and Maintenance of Scaffolding

- a. Pre-Use Inspection: Prior to each use, a competent person will conduct a thorough inspection of the scaffold to ensure it is in good condition and free from defects. Inspection records will be maintained.
- b. Frequent Inspections: Daily inspections will be conducted by the scaffold user or supervisor to identify and rectify any issues that may arise during use.
- c. Periodic Inspections: A qualified person will perform periodic inspections at intervals not exceeding every 7 days or after any event that could affect the scaffold's structural integrity.
- d. Documentation: Records of all scaffold inspections, including findings and corrective actions, will be documented and retained for a minimum of [specify duration] years.

4.3 Load Capacity and Weight Limits

- a. Load Ratings: Scaffolds will be designed and constructed to support the maximum intended load, including the weight of workers, materials, and equipment.
- b. Posting Load Capacities: Load capacities will be clearly posted on the scaffold or provided to users in written form. Any alterations or additions that may affect load capacity are strictly prohibited.
- c. Prohibited Activities: Employees are prohibited from overloading scaffolds beyond their designated capacities. This includes both live loads (workers and materials in use) and dead loads (the weight of the scaffold itself).
- d. Consultation with Designers: If modifications to the scaffold or additional loading requirements are necessary, the qualified designer must be consulted to assess and approve these changes.

Capital Maintenance Ltd emphasizes the critical importance of proper design, construction, and ongoing inspection of scaffolding structures to ensure the safety of employees engaged in property maintenance activities. Any concerns regarding the design, construction, or load capacity of scaffolds must be reported immediately to a supervisor or qualified person for assessment and corrective action. Non-compliance with these guidelines may result in disciplinary action.

SCAFFOLD TRAINING AND COMPETENCY

5.1 Training Requirements for Scaffold Users

Capital Maintenance Ltd recognizes the importance of providing comprehensive training to all employees who may be involved in scaffolding activities. Training programs will include, but are not limited to:

- a. Basic Scaffold Awareness: All employees must receive basic training on the hazards associated with scaffold use, including fall hazards, proper use of personal protective equipment (PPE), and recognition of unsafe conditions.
- b. Specific Scaffold Type Training: Employees will receive training specific to the types of scaffolds they will be using, including frame scaffolds, suspended scaffolds, and mobile scaffolds.
- c. Erection and Dismantling Training: Employees involved in scaffold erection and dismantling will receive specialized training, ensuring they are familiar with proper procedures and safety precautions.
- d. Fall Protection Training: Training on the proper use of fall protection systems, including personal fall arrest systems, guardrails, and safety nets, will be provided to all employees exposed to fall hazards.

e. Rescue Training: Employees who work on scaffolds at heights requiring fall protection will receive training in rescue procedures to ensure a timely and effective response in case of a fall.

5.2 Certification and Competency Assessment

- a. Certification Requirements: Individuals involved in the design, erection, inspection, and supervision of scaffolds must possess relevant certifications, where applicable, to demonstrate their competence in these roles.
- b. Competency Assessment: Competency assessments will be conducted for all employees involved in scaffold activities to ensure they have the necessary knowledge and skills to perform their tasks safely.
- c. Frequency of Competency Assessments: Competency assessments will be conducted at regular intervals and following any significant change in work practices, equipment, or scaffolding regulations.
- d. Record of Competency: Records of all competency assessments, including the date, results, and any additional training or corrective actions, will be maintained for each employee.
- e. Refresher Training: Refresher training will be provided at regular intervals, as determined by the risk assessment or changes in regulations, to ensure ongoing competency and awareness.

5.3 Training Programs Outline

- a. Orientation Training: All new employees will receive a comprehensive orientation that includes an overview of the company's scaffolding policy, general safety practices, and an introduction to scaffold use.
- b. Task-Specific Training: Employees will receive task-specific training that addresses the particular hazards and safety considerations associated with their roles in scaffold activities.
- c. Practical Training: Hands-on, practical training will be provided to ensure employees can demonstrate the proper use of scaffolding equipment, including erecting, dismantling, and working on scaffolds safely.
- d. Written Assessments: Written assessments will be conducted to evaluate employees' understanding of scaffold safety principles and procedures.
- e. Documentation: Records of all training sessions, assessments, and certifications will be maintained in employee training files.

Capital Maintenance Ltd is committed to ensuring that all employees involved in scaffold activities are adequately trained and competent to perform their tasks safely. Employees are encouraged to actively participate in ongoing training and to report any concerns or deficiencies in their training to their

supervisors. Failure to comply with training requirements may result in disciplinary action.

SCAFOLD ERECTION AND DISMANTLING PROCEDURES

6.1 Qualified Persons

- a. Designation of Qualified Persons: Only qualified individuals, possessing the necessary knowledge, training, and experience, will be responsible for the design, erection, and dismantling of scaffolds.
- b. Competency Requirements: Qualified persons must demonstrate competence in scaffold erection and dismantling procedures and be familiar with relevant HSE regulations and industry best practices.
- c. Supervision: Scaffold erection and dismantling activities will be conducted under the supervision of a qualified person who will ensure that procedures are followed, and safety measures are implemented.

6.2 Sequential Steps for Erection and Dismantling

- a. Preparation and Planning:
 - i. Conduct a pre-work assessment to identify potential hazards and determine the type of scaffold required.
 - ii. Develop a scaffold erection or dismantling plan that includes a sequence of steps, materials needed, and safety precautions.
 - iii. Verify that the work area is clear of obstacles and potential hazards.
- b. Assembly (Erection):
 - i. Inspect all scaffold components before assembly to ensure they are in good condition.
 - ii. Follow the manufacturer's guidelines and the scaffold design plan for proper assembly.
 - iii. Install base plates or mud sills on a stable foundation.
 - iv. Ensure proper bracing and connections between scaffold components.
 - v. Install guardrails and toe boards as the scaffold is erected.
 - vi. Ensure that all platform planks are secure and in good condition.
- c. Inspection:
 - i. Conduct a thorough inspection of the erected scaffold before use.
 - ii. Verify that all components are properly secured and that guardrails, toe boards, and access points are in place.
 - iii. Inspect the scaffold for stability and alignment.
 - iv. Document the inspection results and ensure that any identified issues

are promptly addressed.

d. Use of Scaffolding:

- i. Prior to use, ensure that all employees who will be working on the scaffold have received proper training.
- ii. Monitor the scaffold during use to identify and address any issues promptly.
- iii. Restrict access to the scaffold to authorised personnel only.

e. Dismantling:

- i. Follow a reverse sequence of the erection process when dismantling the scaffold.
- ii. Remove all components in a controlled manner to prevent instability.
- iii. Use proper personal protective equipment during the dismantling process.
- iv. Inspect components for damage or wear as they are disassembled.
- v. Lower materials and equipment to the ground using a controlled method.

f. Final Inspection:

- i. Conduct a final inspection after dismantling to ensure that all components have been properly disassembled and that the work area is clear of debris.
- ii. Document the final inspection results.

6.3 Documentation and Record-Keeping

- a. Record of Erection and Dismantling: Maintain a record of all scaffold erection and dismantling activities, including dates, qualified personnel involved, and any issues identified and resolved.
- b. Design Plan and Instructions: Keep a copy of the scaffold design plan and manufacturer's instructions for reference during erection and dismantling activities.
- c. Training Records: Verify that all personnel involved in scaffold erection and dismantling have received the necessary training and keep records of this training.

Capital Maintenance Ltd is committed to ensuring that scaffold erection and dismantling procedures are conducted safely and in compliance with industry standards. Employees involved in these activities are expected to follow these procedures meticulously and report any concerns or deviations to their supervisors. Non-compliance with these procedures may result in disciplinary

action.

FALL PROTECTION AND GUARDRAILS

7.1 Use of Personal Fall Arrest Systems

- a. Fall Hazard Assessment:
 - i. Prior to scaffold use, conduct a fall hazard assessment to identify potential risks.
 - ii. Determine the need for personal fall arrest systems based on the height of the scaffold and the nature of the work.
- b. Proper Fit and Inspection:
 - i. Ensure that personal fall arrest systems are properly fitted to each user.
 - ii. Conduct pre-use inspections of all fall protection equipment to identify and replace any damaged or worn components.
- c. Anchorage Points:
 - i. Identify and use appropriate anchorage points that can support the forces generated in the event of a fall.
 - ii. Avoid anchoring to weak or unsecured structures.
- d. Fall Clearance Calculation:
 - i. Calculate the fall clearance distance to ensure that in the event of a fall, the user will not come into contact with any lower levels or structures.
- e. Training and Certification:
 - i. Provide training on the proper use of personal fall arrest systems, including donning, doffing, and inspection.
 - ii. Certify employees who use personal fall arrest systems as competent to use this equipment.

7.2 Guardrail Requirements

- a. Standard Guardrails:
 - i. Install standard guardrails on all open sides and ends of scaffolds where employees are exposed to fall hazards.
 - ii. Ensure guardrails are installed at a height between 39 and 45 inches above the scaffold platform.
- b. Midrails and Toe Boards:
 - i. Install midrails between the top rail and scaffold platform.
 - ii. Include toe boards to prevent tools and materials from falling off the scaffold.

- c. Inspection:
 - i. Regularly inspect guardrails for stability, proper installation, and any signs of damage or wear.
 - ii. Document and promptly address any issues identified during inspections.
- d. Alternative Fall Protection:
 - i. In situations where guardrails alone may not provide adequate protection, implement alternative fall protection measures such as personal fall arrest systems.
- e. Training on Guardrail Use:
 - i. Provide training on the purpose and proper use of guardrails to all employees working on or near scaffolds.
 - ii. Reinforce the importance of not removing or altering guardrails without proper authorisation.

7.3 Additional Fall Protection Measures

- a. Safety Nets:
 - i. Where applicable, use safety nets as an additional fall protection measure.
 - ii. Ensure safety nets are installed below the scaffold and meet the requirements of applicable standards.
- b. Controlled Access Zones:
 - i. Establish controlled access zones to limit entry to areas where fall hazards exist.
 - ii. Clearly mark and communicate controlled access zones to all personnel.
- c. Tool Tethers:
 - i. Secure tools and equipment to prevent them from falling from the scaffold.
 - ii. Use tool tethers, lanyards, or other appropriate methods for securing tools.

Capital Maintenance Ltd is committed to the safety of employees exposed to fall hazards while working on or near scaffolds. Implementation and adherence to these fall protection and guardrail procedures are crucial for creating a safe working environment. Employees are expected to comply with these procedures and report any concerns or violations promptly to their supervisors. Non-compliance with fall protection measures may result in disciplinary action.

7.3 Additional Fall Protection Measures

TOOL AND MATERIAL HANDLING ON SCAFFOLDS

8.1 Securement of Tools and Materials

a. Tool Tethers:

- i. All tools and equipment used on scaffolds must be secured with appropriate tool tethers, lanyards, or other securement methods.
- ii. Verify that the weight of tools and equipment is within the load capacity of the scaffold.

b. Buckets and Containers:

- i. Use buckets or containers with secure lids to transport small tools and materials.
- ii. Securely attach buckets or containers to the scaffold to prevent them from being knocked over.

c. Barricades for Hazardous Materials:

- i. When working with hazardous materials, establish barricades or controlled access zones to prevent unauthorised access.
- ii. Clearly label hazardous materials and communicate the associated risks to all personnel.



8.2 Weight Restrictions

a. Load Capacity Awareness:

- i. All employees must be aware of the load capacity of the scaffold they are working on.
- ii. Avoid overloading scaffolds with materials, tools, or equipment that exceed the designated load capacity.

b. Prohibited Items:

- i. Prohibit the use of heavy or bulky items that may compromise the stability of the scaffold.
- ii. Communicate the weight limits to all personnel and enforce strict adherence.

c. Material Hoisting:

- i. When hoisting materials onto the scaffold, use a controlled method to prevent sudden loads that may impact stability.
- ii. Use appropriate hoisting equipment and ensure it is properly secured.

8.3 Hoisting and Lowering Equipment Safely

- a. Selection of Hoisting Equipment:
 - i. Select hoisting equipment that is appropriate for the weight and size of the materials being lifted.
 - ii. Ensure that hoisting equipment is in good working condition and regularly inspected.
- b. Securement of Loads:
 - i. Secure all loads to prevent swinging or shifting during hoisting.
 - ii. Use taglines or other control measures to guide loads safely onto the scaffold.
- c. Communication:
 - i. Establish clear communication protocols between personnel involved in hoisting and lowering operations.
 - ii. Use standardised signals or communication devices to coordinate movements.

8.4 Prohibited Activities

- a. Running or Jumping on Scaffolds:
 - i. Prohibit running or jumping on scaffolds, as this can create uncontrolled forces and increase the risk of instability.
- b. Pushing or Pulling Scaffold Platforms:
 - i. Avoid pushing or pulling scaffold platforms when personnel are on them.
 - ii. Use appropriate lifting equipment to reposition scaffolding components.
- c. Storage of Excessive Materials:
 - i. Do not store excessive materials, tools, or equipment on the scaffold.
 - ii. Keep the working area clear to facilitate movement and prevent tripping hazards.

8.5 Training on Material Handling

- a. Material Handling Training:
 - i. Provide training on proper material handling techniques to all employees working on scaffolds.
 - ii. Include information on load capacities, securement methods, and the potential risks associated with improper material handling.
- b. Refresher Training:

- i. Conduct refresher training sessions at regular intervals to reinforce safe material handling practices.
- ii. Update employees on any changes to material handling procedures or equipment.

Capital Maintenance Ltd emphasises the importance of proper tool and material handling on scaffolds to prevent accidents, injuries, and damage to equipment. Employees are expected to adhere to these procedures, report any concerns, and actively participate in training programs. Non-compliance with these guidelines may result in disciplinary action.

INCIDENT REPORTING AND INVESTIGATION

9.1 Reporting Procedures

a. Immediate Reporting:

- i. All employees must immediately report any scaffold-related incidents, injuries, near misses, or hazardous conditions to their immediate supervisor.
- ii. If a supervisor is not available, employees should report incidents to the designated safety officer or another responsible party.

b. Reporting Channels:

- i. Establish clear reporting channels to ensure that information reaches the appropriate personnel promptly.
- ii. Employees should be aware of and have access to reporting mechanisms, such as incident reporting forms or electronic reporting systems.

c. Anonymous Reporting:

- i. Encourage employees to report incidents without fear of reprisal.
- ii. Provide an option for anonymous reporting to promote open communication and a proactive safety culture.

9.2 Investigation Process

a. Immediate Response:

- i. Upon receiving a report, the supervisor or designated safety officer will immediately respond to the incident scene to assess the situation.
- ii. If necessary, initiate emergency response procedures, including first aid and medical assistance.

b. Preservation of Scene:

- i. Preserve the scene of the incident to the extent possible.

- ii. Do not disturb or remove any equipment or materials until the investigation has been initiated.
- c. Notification:
- Notify relevant parties, including management, safety personnel, and regulatory authorities, as required by local regulations.
 - Communicate the incident to all personnel who may be affected or have information relevant to the investigation.
- d. Investigation Team:
- Form an investigation team composed of qualified individuals who were not directly involved in the incident.
 - Include representatives from management, safety personnel, and, if applicable, employee representatives.
- e. Root Cause Analysis:
- Conduct a thorough root cause analysis to identify the underlying factors contributing to the incident.
 - Consider human factors, equipment failures, environmental conditions, and organisational issues.
- f. Documentation:
- Document all aspects of the investigation, including statements from involved parties, photographs, sketches, and any relevant records.
 - Maintain a comprehensive record for future reference and analysis.
- g. Corrective Actions:
- Implement immediate corrective actions to address any imminent hazards identified during the investigation.
 - Develop and implement long-term corrective actions to prevent similar incidents in the future.
- h. Review with Employees:
- Share the findings of the investigation with all relevant employees.
 - Communicate the corrective actions taken to prevent recurrence.

9.3 Corrective Actions and Preventive Measures

- a. Implementation of Corrective Actions:
- Ensure that all identified corrective actions are promptly implemented.
 - Monitor the effectiveness of corrective actions to verify that they address the root causes.
- b. Periodic Reviews:
- Conduct periodic reviews of incident reports and investigations to

- identify trends or recurring issues.
- ii. Use the information gathered to enhance safety procedures and training programs.
- c. Preventive Measures:
- i. Develop and implement preventive measures based on lessons learned from incident investigations.
 - ii. Proactively address potential hazards to prevent similar incidents in the future.

Capital Maintenance Ltd is committed to continuous improvement in safety performance. Incident reporting and investigation are integral components of this commitment, providing valuable information for enhancing safety procedures and preventing future incidents. Employees are encouraged to actively participate in incident reporting and to cooperate fully during investigations. Non-compliance with reporting procedures or interference with investigations may result in disciplinary action.

EMERGENCY PROCEDURES

10.1 Emergency Preparedness

- a. Emergency Plan:
 - i. Develop and maintain a comprehensive emergency plan specific to scaffolding activities.
 - ii. The plan should address potential emergencies such as falls, scaffold collapses, adverse weather conditions, fire, and medical emergencies.
- b. Emergency Response Team:
 - i. Designate an emergency response team consisting of trained personnel responsible for coordinating and executing emergency response activities.
 - ii. Ensure that team members are familiar with their roles and responsibilities.
- c. Communication Protocols:
 - i. Establish clear communication protocols for reporting emergencies and activating emergency response procedures.
 - ii. Provide communication devices such as radios or mobile phones for use during emergencies.

10.2 Emergency Evacuation

- a. Evacuation Routes:
 - i. Identify primary and secondary evacuation routes from scaffolding and work areas.

- ii. Clearly mark and communicate evacuation routes to all personnel.
- b. Assembly Points:
 - i. Designate assembly points where employees should gather after evacuating the scaffold.
 - ii. Ensure assembly points are at a safe distance from the work area and potential hazards.
- c. Evacuation Procedures:
 - i. In the event of an emergency, follow established evacuation procedures.
 - ii. Evacuate the scaffold in an orderly manner, using designated routes.
- d. Accountability:
 - i. Establish a system for accounting for all personnel after an evacuation.
 - ii. Designate specific personnel responsible for conducting headcounts and reporting missing individuals.

10.3 First Aid and Medical Assistance

- a. First Aid Training:
 - i. Provide first aid training to designated personnel who may be the first responders in the event of an injury or medical emergency.
 - ii. Ensure that first aid kits are readily available and well-stocked.
- b. Emergency Contacts:
 - i. Maintain a list of emergency contacts, including local emergency services, medical facilities, and company contacts.
 - ii. Post emergency contact information in easily accessible locations.
- c. Medical Evacuation Plan:
 - i. Develop a medical evacuation plan for situations where immediate medical attention is required.
 - ii. Ensure that the plan includes procedures for summoning emergency medical services and transporting injured individuals to medical facilities.

10.4 Fire Safety

- a. Fire Prevention Measures:
 - i. Implement fire prevention measures, including proper storage of flammable materials and regular inspection of electrical equipment.
 - ii. Prohibit smoking on or near scaffolds and establish designated smoking areas.
- b. Fire Extinguishers:
 - i. Install appropriate fire extinguishers near scaffold access points.

- ii. Train personnel on the proper use of fire extinguishers.
- c. Emergency Exits:
 - i. Identify and maintain clear emergency exits from scaffolds.
 - ii. Ensure that emergency exits are not obstructed and are easily accessible.

10.5 Adverse Weather Conditions

- a. Monitoring Weather Conditions:
 - i. Establish a system for monitoring weather conditions, especially conditions that may pose a risk to scaffold stability, such as high winds or lightning.
 - ii. Designate responsible personnel to monitor weather updates and communicate potential risks.
- b. Suspension of Work:
 - i. Implement procedures for suspending scaffold work during adverse weather conditions.
 - ii. Ensure that all personnel are aware of the suspension procedures and are evacuated from scaffolds promptly.

10.6 Communication and Coordination

- a. Emergency Alarms:
 - i. Install audible alarms or other warning systems to alert personnel to emergency situations.
 - ii. Conduct regular drills to familiarise personnel with the sound and meaning of emergency alarms.
- b. Coordination with External Services:
 - i. Establish communication and coordination protocols with external emergency services.
 - ii. Provide emergency services with information about scaffold locations and access points.
- c. Emergency Drills:
 - i. Conduct regular emergency drills to ensure that personnel are familiar with emergency procedures and evacuation routes.
 - ii. Evaluate the effectiveness of drills and make improvements as needed.

Capital Maintenance Ltd is committed to ensuring the safety and well-being of all personnel in the event of emergencies. Employees are expected to familiarise themselves with emergency procedures, participate in training and drills, and follow established protocols during emergency situations. Non-compliance with emergency procedures may result in disciplinary action.

DOCUMENTATION AND RECORD-KEEPING

11.1 Document Control

- a. Policy Documentation:
 - i. Maintain a centralised system for storing and controlling access to the Scaffolding Policy and related documents.
 - ii. Regularly review and update policy documents to ensure they reflect current practices and regulatory requirements.
- b. Version Control:
 - i. Implement a version control system to track revisions to policy documents.
 - ii. Clearly label each document with its revision date and version number.
- c. Distribution:
 - i. Ensure that the latest version of the Scaffolding Policy and related documents is readily available to all personnel who need access.
 - ii. Use electronic distribution methods to facilitate quick and widespread dissemination of updates.

11.2 Training Records

- a. Employee Training:
 - i. Maintain accurate records of scaffolding-related training for each employee.
 - ii. Document the type of training, date of completion, and any certifications obtained.
- b. Training Attendance:
 - i. Document attendance for all training sessions, including orientation, task-specific training, and refresher courses.
 - ii. Include the names of trainers, training materials used, and any assessments conducted.
- c. Competency Assessments:
 - i. Keep records of competency assessments for individuals involved in scaffold design, erection, inspection, and supervision.
 - ii. Document the date of assessment, results, and any additional training or corrective actions required.

11.3 Inspection and Maintenance Records

- a. Pre-Use Inspections:
 - i. Document the results of pre-use inspections conducted by scaffold

- users before each use.
- ii. Include information on any defects or issues identified and the actions taken to address them.
- b. Frequent Inspections:
- i. Maintain records of daily or frequent inspections conducted by supervisors or designated individuals.
 - ii. Document findings, corrective actions, and the date of each inspection.
- c. Periodic Inspections:
- i. Keep records of periodic inspections conducted by qualified individuals at intervals not exceeding every 7 days.
 - ii. Document the date of inspection, any findings, and the actions taken.



11.4 Incident Reports

- a. Incident Reporting Forms:
- i. Implement incident reporting forms to systematically collect information on scaffold-related incidents, injuries, or near misses.
 - ii. Include fields for the date, time, location, individuals involved, description of the incident, and immediate corrective actions taken.
- b. Investigation Reports:
- i. Document the findings of incident investigations, including root cause analysis, corrective actions, and preventive measures.
 - ii. Maintain records of investigation reports for reference and analysis.
- c. Communication Logs:
- i. Keep a log of communication related to incident reporting and investigations, including notifications, follow-up actions, and resolutions.
 - ii. Document any interactions with external agencies, such as regulatory bodies or emergency services.

11.5 Equipment and Scaffold Component Documentation

- a. Manufacturer's Instructions:
- i. Retain and make accessible the manufacturer's instructions for all scaffolding components.
 - ii. Provide training to employees on how to access and interpret manufacturer instructions.
- b. Load Capacity Certificates:
- i. Keep load capacity certificates for scaffolds readily available.

- ii. Ensure that load capacity information is clearly communicated to all relevant personnel.
- c. Equipment Inspection Records:
 - i. Document the results of equipment inspections, including scaffolding components, personal fall arrest systems, and other safety equipment.
 - ii. Include information on inspection dates, findings, and any actions taken.

11.6 Emergency Response Documentation

- a. Emergency Plans:
 - i. Maintain copies of the company's emergency plan and related documentation.
 - ii. Ensure that emergency plans are distributed to all relevant personnel and are easily accessible.
- b. Emergency Drill Records:
 - i. Document the dates, participants, and outcomes of emergency drills.
 - ii. Use drill records to evaluate the effectiveness of emergency procedures and identify areas for improvement.
- c. Evacuation Maps:
 - i. Keep updated evacuation maps in visible locations on scaffolds and in work areas.
 - ii. Document any changes to evacuation plans or assembly points.

Capital Maintenance Ltd places significant emphasis on documentation and record-keeping as integral components of its scaffolding safety program. Proper documentation ensures transparency, accountability, and the ability to track and continuously improve safety practices. All personnel are expected to adhere to established documentation procedures, and any deviations may result in disciplinary action.

CONTINUOUS IMPROVEMENT

12.1 Regular Safety Audits and Inspections

- a. Scheduled Audits:
 - i. Conduct regular safety audits and inspections of scaffolding activities.
 - ii. Establish a schedule for audits, ensuring that all scaffolds and associated activities are systematically reviewed.
- b. Qualified Auditors:
 - i. Assign qualified individuals who are independent of the scaffold

- activities to perform safety audits.
- ii. Ensure auditors have the necessary training and experience to identify potential hazards and assess compliance.
- c. Checklist Utilisation:
- i. Develop and utilise comprehensive checklists for safety audits.
 - ii. Include items such as scaffold stability, guardrail integrity, access points, personal protective equipment usage, and adherence to safety procedures.
- d. Documentation of Findings:
- i. Document the findings of safety audits, including both positive observations and areas requiring improvement.
 - ii. Prioritise and categorise findings based on the level of risk and potential impact on safety.
- e. Corrective Actions:
- i. Implement corrective actions promptly in response to audit findings.
 - ii. Ensure that corrective actions address root causes and prevent the recurrence of identified issues.
- f. Follow-Up Audits:
- i. Conduct follow-up audits to verify the effectiveness of corrective actions.
 - ii. Adjust procedures as necessary based on the outcomes of follow-up audits.

12.2 Feedback and Suggestions Mechanism

- a. Anonymous Reporting:
- i. Establish an anonymous feedback and suggestions mechanism for employees to report concerns or provide ideas for improvement.
 - ii. Encourage open communication and emphasise that all feedback is valued.
- b. Designated Channels:
- i. Provide clear and easily accessible channels for employees to submit feedback and suggestions.
 - ii. Include options for submitting feedback in person, electronically, or through suggestion boxes.
- c. Regular Reviews:
- i. Regularly review feedback and suggestions received from employees.
 - ii. Prioritise actions based on the severity and frequency of reported

issues.

d. Communication of Changes:

- i. Communicate changes made as a result of employee feedback.
- ii. Ensure that employees are informed about how their input contributes to the enhancement of scaffolding safety.

e. Recognition Programs:

- i. Implement recognition programs to acknowledge employees who provide valuable feedback or contribute innovative suggestions.
- ii. Celebrate and reward individuals or teams whose input leads to significant safety improvements.

12.3 Review and Update of the Policy

a. Scheduled Policy Reviews:

- i. Establish a regular schedule for reviewing and updating the Scaffolding Policy.
- ii. Conduct reviews at least annually or more frequently if there are changes in regulations, industry standards, or company practices.

b. Cross-Functional Review Team:

- i. Form a cross-functional review team to assess the policy.
- ii. Include representatives from safety, operations, management, and employees with hands-on scaffolding experience.

c. Feedback Incorporation:

- i. Incorporate feedback from safety audits, incident investigations, and employee suggestions into the policy review process.
- ii. Ensure that the policy reflects current best practices and lessons learned.

d. Communication of Policy Changes:

- i. Communicate any updates or changes to the Scaffolding Policy to all relevant personnel.
- ii. Provide training sessions or informational materials to ensure awareness and understanding of policy revisions.

e. Record Keeping:

- i. Maintain records of policy reviews and updates, including meeting minutes, change logs, and the rationale behind modifications.
- ii. Use these records for future reference and as a basis for continuous improvement.

Capital Maintenance Ltd recognises the dynamic nature of scaffolding safety and is committed to the continuous improvement of policies and procedures. Regular safety audits, feedback mechanisms, and policy reviews are integral components of this commitment. All employees are encouraged to actively participate in these processes, contributing to the ongoing enhancement of scaffolding safety. Non-compliance with policy management procedures may result in disciplinary action.

COMMUNICATION OF POLICY

13.1 Employee Awareness Programs

- a. Orientation Training:
 - i. Conduct comprehensive orientation training for all employees to familiarise them with the Scaffolding Policy.
 - ii. Ensure that new hires receive thorough information on policy guidelines and expectations.
- b. Periodic Training Sessions:
 - i. Organise periodic training sessions to reinforce key aspects of the Scaffolding Policy.
 - ii. Cover topics such as hazard identification, proper use of equipment, and emergency procedures.
- c. Specialized Training for Roles:
 - i. Provide specialized training for employees involved in scaffold design, erection, inspection, and supervision.
 - ii. Tailor training programs to address the specific responsibilities and challenges associated with each role.
- d. Documentation of Training:
 - i. Maintain detailed records of employee training on scaffolding safety.
 - ii. Document the content of training sessions, attendance, and any assessments conducted.

13.2 Posting of Safety Notices

- a. Strategic Placement:
 - i. Display safety notices in strategic locations where employees can easily access and read them.
 - ii. Place notices in areas with high foot traffic, near scaffold access points, and in break areas.
- b. Multilingual Notices:

- i. Ensure that safety notices are provided in languages spoken by the workforce.
 - ii. Promote inclusivity and understanding by accommodating diverse linguistic needs.
- c. Visual Aids:
- i. Use visual aids such as diagrams, illustrations, and infographics to enhance the clarity of safety notices.
 - ii. Reinforce key messages through easily understandable visuals.
- d. Regular Updates:
- i. Regularly update safety notices to reflect any changes in policies, procedures, or emergency contacts.
 - ii. Communicate updates to employees promptly and provide training if necessary.

13.3 Regular Toolbox Talks

- a. Frequency and Schedule:
- i. Conduct regular toolbox talks on scaffolding safety, with a frequency determined by the level of scaffold activity and associated risks.
 - ii. Establish a schedule for toolbox talks, ensuring that they are integrated into the work routine.
- b. Participation:
- i. Encourage active participation from all employees during toolbox talks.
 - ii. Create an open environment for discussion, questions, and the sharing of experiences related to scaffolding safety.
- c. Topics Covered:
- i. Cover a range of topics during toolbox talks, including recent incidents, updates to safety procedures, and reminders of best practices.
 - ii. Tailor talks to address specific challenges or trends identified through safety audits and incident investigations.
- d. Documentation:
- i. Document each toolbox talk, including the date, topics discussed, and attendees.
 - ii. Use documentation to track the effectiveness of toolbox talks and identify areas for improvement.
- e. Interactive Elements:
- i. Incorporate interactive elements into toolbox talks, such as demonstrations, hands-on activities, or quizzes.

- ii. Reinforce learning through engaging and participatory methods.

Capital Maintenance Ltd prioritizes effective communication of the Scaffolding Policy to ensure that all employees are aware of and understand the safety expectations. Employee awareness programs, strategically placed safety notices, and regular toolbox talks are essential components of this communication strategy. All employees are expected to actively participate in these initiatives, contributing to a culture of safety awareness and continuous improvement. Non-compliance with communication procedures may result in disciplinary action.

CONTRACTOR AND SUBCONTRACTOR REQUIREMENTS

14.1 Communication of Safety Policies

a. Policy Distribution:

- i. Provide all contractors and subcontractors with a copy of the Scaffolding Policy and related safety documentation.
- ii. Ensure that the information is easily accessible and distributed prior to the commencement of work.

b. Orientation Sessions:

- i. Conduct orientation sessions for contractors and subcontractors to review the key elements of the Scaffolding Policy.
- ii. Emphasize the importance of compliance with safety regulations and the company's expectations.

c. Documentation Acknowledgment:

- i. Obtain written acknowledgment from contractors and subcontractors confirming their receipt and understanding of the Scaffolding Policy.
- ii. Maintain records of these acknowledgments for reference and auditing purposes.

14.2 Verification of Compliance

a. Pre-Work Inspections:

- i. Conduct pre-work inspections to verify that contractors and subcontractors are adhering to scaffolding safety standards.
- ii. Ensure that scaffolds erected by contractors meet the same safety criteria as those erected by company personnel.

b. Documented Procedures:

- i. Request and review documented procedures from contractors detailing their scaffolding processes.

- ii. Ensure that these procedures align with the company's Scaffolding Policy and applicable safety regulations.
- c. Regular Audits:
 - i. Implement regular audits to assess ongoing compliance with safety policies.
 - ii. Schedule audits at key milestones during the project to identify and address any deviations promptly.

14.3 Joint Safety Planning

- a. Collaborative Planning Sessions:
 - i. Facilitate joint safety planning sessions with contractors and subcontractors.
 - ii. Discuss specific scaffolding requirements, potential hazards, and emergency response procedures.
- b. Risk Assessment:
 - i. Conduct a collaborative risk assessment to identify and mitigate potential hazards associated with scaffolding activities.
 - ii. Develop a shared understanding of risk levels and prioritize safety measures accordingly.
- c. Emergency Response Coordination:
 - i. Establish coordination mechanisms for emergency response efforts between the company and contractors.
 - ii. Ensure that all parties are aware of emergency procedures and communication protocols.
- d. Communication Channels:
 - i. Establish clear communication channels for sharing safety-related information between the company, contractors, and subcontractors.
 - ii. Encourage open dialogue and the prompt reporting of safety concerns.
- e. Documentation of Joint Safety Plans:
 - i. Document joint safety plans, including risk assessments, emergency response strategies, and communication protocols.
 - ii. Ensure that all parties involved have access to and understand the joint safety plans.

Capital Maintenance Ltd places a high priority on safety collaboration with contractors and subcontractors to ensure a unified commitment to scaffolding safety. Effective communication of safety policies, verification of compliance, and joint safety planning are essential components of this collaborative

effort. All contractors and subcontractors are expected to comply with the company's safety standards, and any deviations may result in corrective actions or termination of the contract.

ENVIRONMENTAL CONSIDERATIONS

15.1 Waste Management

- a. Waste Minimization:
 - i. Implement measures to minimize waste generation during scaffolding activities.
 - ii. Encourage the use of reusable materials and proper storage practices to reduce unnecessary waste.
- b. Segregation and Recycling:
 - i. Establish a waste segregation system to separate recyclable materials from non-recyclables.
 - ii. Collaborate with waste management services to ensure the proper recycling of materials such as wood, metal, and plastic.
- c. Disposal Procedures:
 - i. Clearly define procedures for the proper disposal of waste generated during scaffolding activities.
 - ii. Ensure that waste is disposed of in accordance with local environmental regulations.
- d. Hazardous Material Handling:
 - i. Identify and properly handle any hazardous materials generated during scaffolding work.
 - ii. Implement specific protocols for the safe disposal of hazardous waste, including coordination with licensed disposal facilities.
- e. Educational Programs:
 - i. Conduct educational programs to raise awareness among employees about the importance of waste management.
 - ii. Provide training on proper waste handling procedures and the company's commitment to environmental responsibility.

15.2 Protection of Surrounding Environment

- a. Erosion and Sediment Control:
 - i. Implement erosion and sediment control measures to prevent soil erosion and contamination of water sources.
 - ii. Use appropriate barriers, sediment fences, and silt curtains to contain

any runoff from the construction site.

b. Vegetation Preservation:

i. Develop plans to preserve and protect existing vegetation surrounding the scaffolding work area.

ii. Implement measures to minimize the impact on local flora and fauna.

c. Noise and Air Quality Management:

i. Implement strategies to manage noise and air quality associated with scaffolding activities.

ii. Use equipment with noise-reducing features and adhere to local regulations regarding permissible noise levels.

d. Spill Response Plans:

i. Develop spill response plans to address potential spills of hazardous materials.

ii. Ensure that all employees are trained in spill response procedures and have access to necessary spill containment materials.

e. Coordination with Authorities:

i. Coordinate with local environmental authorities to ensure compliance with environmental regulations.

ii. Obtain necessary permits and approvals for scaffolding activities that may impact the surrounding environment.

f. Regular Environmental Audits:

i. Conduct regular environmental audits to assess the impact of scaffolding activities on the surrounding environment.

ii. Document audit findings and implement corrective actions to address any identified environmental concerns.

g. Community Engagement:

i. Engage with local communities to address any environmental concerns or issues related to scaffolding activities.

ii. Maintain open communication and address community feedback to improve environmental practices.

Capital Maintenance Ltd is committed to conducting scaffolding activities in an environmentally responsible manner. The company recognizes the importance of minimizing environmental impact through effective waste management and protection of the surrounding environment. All employees are expected to adhere to these environmental considerations, and non-compliance may result in disciplinary action.

APPENDIXES

16.1 Relevant Regulations and Standards

- a. Listing of Regulations:
 - i. Compile a comprehensive list of relevant local, regional, and national regulations pertaining to scaffolding safety.
 - ii. Include standards set forth by regulatory bodies such as HSE and any other applicable authorities.
- b. Detailed Summaries:
 - i. Provide detailed summaries of each regulation and standard listed in the appendix.
 - ii. Include key requirements, obligations, and any specific provisions related to scaffold design, erection, use, and inspection.
- c. Hyperlinks and References:
 - i. Include hyperlinks or references to the full text of each regulation or standard for easy access.
 - ii. Ensure that the information is regularly updated to reflect any changes in regulations.
- d. Legal Compliance Declaration:
 - i. Affirm the company's commitment to legal compliance with the listed regulations and standards.
 - ii. Include a declaration stating that the company will adhere to all applicable laws and standards related to scaffolding safety.

16.2 Scaffold Inspection Checklist

- a. Comprehensive Checklist:
 - i. Develop a detailed scaffold inspection checklist covering all critical aspects of scaffold safety.
 - ii. Include items such as scaffold structure, access points, guardrails, planking, and any other relevant components.
- b. Inspection Frequency:
 - i. Specify the frequency of scaffold inspections, including pre-use, frequent, and periodic inspections.
 - ii. Outline the criteria for determining when inspections are required, such as after adverse weather conditions or alterations to the scaffold.
- c. Documentation Procedures:
 - i. Establish procedures for documenting the results of scaffold inspections.
 - ii. Include spaces for inspectors to note findings, record corrective actions,

and sign off on the inspection report.

d. Training on Inspection Procedures:

- i. Provide training to personnel responsible for scaffold inspections.
- ii. Ensure that inspectors understand the checklist items, inspection criteria, and the importance of thorough documentation.

16.3 Training Program Outline

a. Program Overview:

- i. Provide an overview of the scaffolding training program, outlining its objectives and structure.
- ii. Detail the specific goals of the program, such as ensuring competence in scaffold design, erection, use, and inspection.

b. Training Modules:

- i. Break down the training program into modules, each covering a distinct aspect of scaffolding safety.
- ii. Include modules on scaffold design, erection and dismantling, fall protection, hazard awareness, and emergency procedures.

c. Duration and Frequency:

- i. Specify the duration and frequency of each training module.
- ii. Outline whether training is one-time or recurring, and the expected timeframe for completion.

d. Assessment and Certification:

- i. Detail the assessment methods used to evaluate participants' understanding of the training content.
- ii. Specify the criteria for certification, including passing scores and any additional requirements.

e. Trainer Qualifications:

- i. Define the qualifications required for trainers conducting scaffolding training.
- ii. Ensure that trainers have the necessary experience, certifications, and expertise in scaffolding safety.

Capital Maintenance Ltd is committed to providing a robust framework for legal compliance, scaffold inspections, and comprehensive training. The appendices in this section serve as essential references, supporting the company's commitment to upholding the highest standards in scaffolding safety. Non-compliance with the listed regulations, inspection procedures, or training requirements may result in disciplinary action.

REVIEW AND APPROVAL

17.1 Review Schedule

- a. Regular Policy Reviews:
 - i. Establish a regular schedule for the review of the Scaffolding Policy.
 - ii. Conduct reviews at least annually or more frequently if there are significant changes in regulations, industry standards, or company practices.
- b. Cross-Functional Review Team:
 - i. Form a cross-functional review team to assess the policy.
 - ii. Include representatives from safety, operations, management, and employees with hands-on scaffolding experience.
- c. Documentation of Reviews:
 - i. Document the details of each policy review, including the date, participants, and topics discussed.
 - ii. Keep records of review meetings, including any proposed changes and the rationale behind those changes.
- d. Incorporation of Feedback:
 - i. Incorporate feedback from safety audits, incident investigations, and employee suggestions into the policy review process.
 - ii. Ensure that the policy reflects current best practices and lessons learned.
- e. Communication of Updates:
 - i. Communicate any updates or changes to the Scaffolding Policy promptly.
 - ii. Provide training sessions or informational materials to ensure awareness and understanding of policy revisions.
- f. Continuous Improvement Emphasis:
 - i. Emphasize a continuous improvement mindset during policy reviews.
 - ii. Encourage all stakeholders to actively contribute to the refinement and enhancement of the Scaffolding Policy.

17.2 Approval Signatures

- a. Authorization for Implementation:
 - i. Clearly outline the approval process for the Scaffolding Policy.
 - ii. Specify the individuals or roles responsible for reviewing and approving

the policy.

b. Signatory Requirements:

- i. Identify the key signatories required for policy approval.
- ii. Ensure that individuals with the authority to approve policies are well-versed in scaffolding safety requirements.

c. Management Approval:

- i. Obtain approval from top management, such as the CEO or designated executive, to demonstrate organisational commitment.
- ii. Include the signatures of relevant managers or executives responsible for overseeing scaffolding safety.

d. Safety Committee Approval:

- i. Present the Scaffolding Policy to the safety committee for review and approval.
- ii. Include signatures of safety committee members indicating their endorsement of the policy.

e. Employee Representation:

- i. Consider including a signature or endorsement from a representative of the employee body.
- ii. This may be a safety representative, or a designated employee chosen to represent the workforce.

f. Periodic Reauthorization:

- i. Establish a periodic reauthorization process to ensure the continued relevance of the Scaffolding Policy.
- ii. Require a review and reapproval of the policy at specified intervals.

g. Record Keeping:

- i. Maintain records of all approval signatures and review dates.
- ii. Keep a documented history of policy approvals for transparency and accountability.

Capital Maintenance Ltd is committed to a robust process of policy review and approval, ensuring that the Scaffolding Policy remains current, effective, and aligned with the company's commitment to safety. All stakeholders are encouraged to actively participate in the review process, and the involvement of top management underscores the importance of the policy in the organisation. Non-compliance with the policy approval process may result in disciplinary action.

2.14 TCE FIRE DOOR POLICY

1 INTRODUCTION

Capital Maintenance Ltd are unequivocally committed to The Fire Safety (England) Regulations 2022.

Capital Maintenance Ltd outlines its commitment to Fire Safety in its Health & Safety Policy, which is reviewed annually.

The Directors of Capital Maintenance Ltd only appoint persons who are responsible for ensuring that all employees fully understand and follow the organisations Fire Door Policy, in compliance with The Fire Safety (England) Regulations 2022 Regulation 10.

2 PURPOSE & SCOPE

This fire door policy outlines the rules and regulations related to the management, maintenance, and use of fire doors within a building or premises within the Jones Lang Lasselle / The Crown Estate (JLL / TCE) portfolio that Capital Maintenance Ltd are instructed to manage.

This policy is specific to the terms & conditions, SLA's, KPI's, processes, systems and costings agreed between Capital Maintenance Ltd and Jones Lang Lasselle / The Crown Estate in the contract signed 01/03/2023.

3 REGULATORY COMPLIANCE

Under the Fire Safety Order, building owners, occupiers, and responsible persons have a legal duty to ensure the safety of individuals in their premises in relation to fire safety. While the Fire Safety Order does not specifically outline technical requirements for fire doors, it places a responsibility on the responsible persons to assess and mitigate fire risks, including ensuring the appropriate installation, maintenance, and inspection of fire doors.

To comply with the regulatory standards the British Standard for fire door maintenance is BS 8214: 2016 Timber-based fire door assemblies. Code of Practice. Also, BSEN16034:2014 Pedestrian door sets, industrial, commercial, garage doors and openable windows. Product standard, performance characteristics. Fire resisting and/or smoke control characteristics. (As per the specification in the Fabric Maintenance Service agreement held between JLL / TCE and Capital Maintenance Ltd).

Fire doors are typically tested and classified based on their fire resistance performance, which is measured in minutes. Common fire resistance ratings for fire doors in the UK include FD30 (30 minutes), FD60 (60 minutes), and FD90 (90 minutes).

In the event the door in question is to be replaced this will be deemed and defined under a clear line of communication from JLL / TCE to Capital Maintenance Ltd.

It will remain the responsibility of JLL / TCE until this instruction is issued to Capital Maintenance Ltd. (Refer to FD regulation / LPCB certification on which door either 30- or 90-minute rating)

In addition to fire resistance, fire doors should also meet other relevant standards, such as those pertaining to hardware, glazing, self-closing mechanisms, and signage. These requirements ensure that fire doors function effectively in an emergency.

It's important to note that fire safety regulations and standards can be subject to updates and changes over time.

As new regulations are rolled out this policy will be reviewed to reflect the latest government guide in compliance.

4 ROLES AND RESPONSIBILITIES

The management of fire doors involves various parties, each with their respective responsibilities.

Here are the key parties involved and their responsibilities:

- **Building Owner**

The building owner has overall responsibility for fire safety within the premises.

In this case this is The Crown Estate.

They are responsible for ensuring that fire doors are installed and maintained in accordance with applicable regulations and standards.

The owner should appoint a responsible person or a competent individual to oversee fire safety measures, including the management of fire doors.

- **Responsible Person**

The responsible person, appointed by the building owner, has specific duties under fire safety regulations.

They are responsible for conducting fire risk assessments to identify potential hazards and determine the appropriate fire safety measures, including fire

doors.

The responsible person should ensure that fire doors are properly installed, inspected, and maintained to meet regulatory requirements.

In this case, this is Jones Lang Lassalle appointed by The Crown Estate.

They may need to coordinate with other parties, such as building managers, maintenance teams, and fire safety professionals, to fulfil their responsibilities effectively.

- **Building Manager or Facilities Manager**

The building manager or facilities manager plays a crucial role in the day-to-day management of fire doors.

They are responsible for ensuring that routine inspections, maintenance, and repairs of fire doors to ensure they remain in good working condition.

In this case, this is Jones Lang Lassalle employing and allocating associated Tenancy and Facilities Managers.

The manager should promptly address and report any concerns or deficiencies related to fire doors and take appropriate actions to rectify them.

- **Fire Safety Professional or Competent Person**

A fire safety professional or a competent person, such as a fire door inspector or consultant (Capital Maintenance Ltd in this case), should be engaged to provide expertise and guidance on fire safety matters.

They can assist in conducting fire door risk assessments, evaluating the suitability of fire doors, and advising on installation, maintenance, and inspection practices.

Capital Maintenance are currently instructed in the agreement set out between all parties, to support on servicing and maintaining all fire doors up to and including the front door of a tenant demise, and nothing further. Any doors within a tenant demise, Capital Maintenance Ltd will not be responsible for.

Capital Maintenance Ltd, if clearly instructed in writing, will support on any doors outside of their agree remit

It is important for these parties to collaborate and communicate effectively to ensure that fire doors are managed in compliance with regulations and standards.

5 FIRE DOOR SPECIFICATIONS

In the United Kingdom, fire doors are subject to industry standard specifications that outline the requirements for their design, construction, installation, and performance.

The following are the commonly referenced industry standards for fire doors in the UK that Capital Maintenance Ltd work in accordance with:

- **British Standard 476 (BS 476)**

BS 476 consists of several parts that cover various aspects of fire resistance testing and performance of building materials, including fire doors.

Part 22 of BS 476 specifically relates to fire door assemblies and provides guidance on the fire resistance requirements for doors and door sets.

This standard assesses the fire resistance of doors based on criteria such as integrity (preventing the passage of flames and hot gases) and insulation (limiting the transfer of heat).

- **European Standard 1634 (EN 1634)**

EN 1634 is a European standard that defines the fire resistance characteristics of doors, shutters, and openable windows.

It classifies fire doors based on their performance during fire tests, including criteria such as integrity, insulation, and smoke control.

Fire door classifications under EN 1634 include E (integrity), EW (integrity and radiation control), and EI (integrity and insulation) followed by a time duration indicating the fire resistance in minutes.

- **Approved Document B (ADB)**

Approved Document B is a guidance document under the UK Building Regulations that provides detailed information on fire safety in buildings.

It includes specific requirements and recommendations for fire doors, covering aspects such as fire resistance, self-closing mechanisms, signage, and glazing.

ADB offers guidance on the performance standards and test methods that fire doors should meet to comply with building regulations.

- **Certifire**

Certifire is a third-party certification scheme widely recognised in the UK for fire doors and related products.

It provides independent testing and assessment of fire doors to verify their compliance with relevant standards, including BS 476 and EN 1634.

Certifire certification demonstrates that a fire door has undergone rigorous testing and meets the specified performance requirements.

These industry standards and guidance documents ensure that fire doors in the UK are designed, installed, and maintained to effectively contain fire and smoke, providing essential protection for building occupants.

6 INSPECTIONS & TESTING

The recommended frequency and process for testing fire doors can vary depending on factors such as the type of premises and the level of usage.

Below are the agreed guidelines followed and implemented by Capital Maintenance Ltd for delivery across both the residential and commercial portfolio for JLL / TCE.

- **Residential**

For buildings over 11 metres in height the Fire Safety (England) Regulations 2022 require the responsible person to use best endeavours to undertake checks of fire doors at the entrances of individual domestic premises in the building at least every twelve months.

They must also undertake checks of any fire doors in communal areas of the building at least every three months.

- **Commercial**

For buildings over 11 metres in height the Fire Safety (England) Regulations 2022 call for the responsible person to use best endeavours to undertake checks of fire doors at the entrances of commercial properties at least every six months.

- **Hybrid (where a building contains both residential and commercial usage)**

For buildings over 11 metres in height the Fire Safety (England) Regulations 2022 call for the responsible person to use best endeavours to advise Capital Maintenance Ltd of the associated Fire Action Plan for the building in question and then communicating the relevant frequency of the necessary door inspections. *If this is not clarified, by default Capital Maintenance Ltd will treat the building as if they are residential dwellings.

If JLL / TCE highlight that any buildings over 18 meters are to be supported by Capital Maintenance Ltd these buildings should be clearly defined by JLL / TCE as to the expected regulations that these buildings should be working towards.

.....

Inspections include visual assessments for any obvious signs of damage or issues that may affect the door's operation or fire performance. Confirming that the door closes fully, the seals are intact, hinges are secure, and any hardware (e.g., handles, locks) is functioning properly.

Inspection example documents are shown in the appendices section.

Annual inspections involve a comprehensive assessment of the fire door's condition and performance.

Inspection of the door and its components in more detail, including checking the integrity of the door leaf, frame, intumescent seals, glazing, and hardware.

Verify that the door meets the required fire resistance rating and that it

operates as intended, including self-closing mechanisms.

Architraves of fire doorways are outside of the agreement and not included or required within the currently held LPCB accreditation, however, can and will be supported on by Capital Maintenance Ltd at request by JLL / TCE

For JLL / TCE sites, once remedials works have been raised on a site, the next inspection for the site even if remedials have not yet been completed, will still be undertaken, and recorded if the due date for it is near expiry.

Only in certain cases, where the remedials extend into a prolonged period of time, may this be reviewed to postpone the inspections and will be assessed only on a case-by-case basis.

7 MAINTENANCE AND REPAIRS

Below are the procedures Capital Maintenance Ltd work to for remedials, repairs and any maintenance.

- **Identify Maintenance Issues**

Conduct routine inspections and annual inspections of fire doors to identify any maintenance issues or deficiencies.

Regularly check for signs of damage, wear and tear, improper operation, gaps, broken seals, damaged hardware, or any other issues that may compromise the door's fire resistance or functionality.

- **Assess and Determine the Required Actions**

Capital Maintenance Ltd will deploy a qualified person or a competent professional, such as a fire door inspector or engineer to assess the severity and impact of the maintenance issue.

Based on the assessment, determine the appropriate actions required, such as repair, maintenance, or replacement.

- **Repair or Maintenance**

For minor issues, repairs or maintenance work may be sufficient to address the problem. These are recorded and proposed to JLL / TCE for review and instruction.

Repair or replace any damaged or faulty components, such as hinges, latches, self-closing devices, seals, or glazing.

Where building control regulations are required for larger works for repair to any fire door, JLL / TCE will be required to apply and manage the building regulation application if necessary to authorise the works to be completed by Capital Maintenance Ltd.

- **Replacement**

In cases where a fire door is severely damaged, cannot be repaired, or no

longer meets the required fire resistance rating, replacement is necessary. This will be recorded and costed in the agreed process and format to be issued to JLL / TCE for review and instruction.

Capital Maintenance Ltd will ensure that the replacement door is installed correctly and in accordance with manufacturer guidelines and relevant regulations.

Where building control regulations are required for larger works for replacement to any fire door, JLL / TCE will be required to apply and manage the building regulation application if necessary to authorise the works to be completed by Capital Maintenance Ltd.

- **Record Maintenance and Repairs**

Documenting the details of the work done, dates, personnel involved, and any relevant supporting documentation, such as invoices or certificate is undertaken by Capital Maintenance in accordance with the agreed processes and systems and made available to JLL / TCE via the agreed platforms set out in the fire door management plan.

8 JLL / TCE FIRE DOOR MANAGEMENT PLAN

The purpose of the JLL / TCE fire door management plan is to provide an agreed clear framework for the inspection, maintenance, and operation of fire doors supported by Capital Maintenance Ltd. Key areas are as below:

- **Competencies & Levels**

The Client Lead FM will decide which doors need to be included in each inspection in line with each fire strategy plan, and in partnership with the professional opinion of Capital Maintenance Ltd. This will then be expected to follow the below agreed escalation process between JLL / TCE and Capital Maintenance Ltd set out below:

- **JLL / TCE agreed Escalation procedures for Capital Maintenance Ltd to follow**

Residential apartments

1. While on site, first contact the resident (if there is a contact phone number available), then Tenancy Manager and then Facilities/Block Manager if no response.
2. If unsuccessful, this would then be rescheduled and managed via the associated CAFM system.
3. This is then followed up with email/job update to JLL / TCE.
4. If awaiting info regarding doors from Tenancy Manager / Facilities/ Block Manager, Capital Maintenance Ltd is to then escalate to Property Manager.
5. If the FM has not responded to Capital Maintenance Ltd following

a no access door circumstance within 10 working days and Capital Maintenance Ltd have escalated this then Capital Maintenance Ltd will proceed with producing the inspection report and any no access doors Capital Maintenance Ltd will attempt to re-inspect these said doors on the buildings next due date of inspection.

Residential common parts

1. While on site, first contact Facilities Manager and then Building Manager.
2. If unsuccessful, this would then be rescheduled and managed via the associated CAFM system.
3. This is followed up with email/job update.
4. If awaiting info regarding doors from Building Manager / Facilities Manager, Capital Maintenance Ltd is to then escalate to Senior Facilities Manager
5. If the FM has not responded to Capital Maintenance Ltd following a no access door circumstance within 10 working days and Capital Maintenance Ltd have escalated this then Capital Maintenance Ltd will proceed with producing the inspection report and any no access doors Capital Maintenance Ltd will attempt to re-inspect these said doors on the buildings next due date of inspection.

Commercial Buildings

1. While on site, first contact the Facilities Manager then the Senior Facilities Manager.
2. This is followed up with email/job update.
3. If awaiting info regarding doors from Facilities Manager, Capital Maintenance Ltd is to then escalate to Senior Facilities Manager.
4. If the FM has not responded to Capital Maintenance Ltd following a no access door circumstance within 10 working days and Capital Maintenance Ltd have escalated this then Capital Maintenance Ltd will proceed with producing the inspection report and any no access doors Capital Maintenance Ltd will attempt to re-inspect these said doors on the buildings next due date of inspection.

- **Listed buildings**

On doors needing to be repaired, or existing modern fire doors within a listed building, these can be undertaken without applying for listed building consent.

Where fire doors are being replaced with new doors within a listed building, this would trigger the need for listed building consent, and the following documents are required when submitting the application to the relevant local authority:

1. Location/Site Plan, (prepared by the JLL / TCE Facilities Manager)
2. Existing Drawings, (supplied by the JLL / TCE Facilities Manager)
3. Proposed Drawings, including detailed drawings of new doors, mouldings etc.. (supplied by the JLL / TCE Facilities manager, who may draft the support from Capital Maintenance at request)
4. Heritage Statement (prepared and supported on by the appointed Historic Buildings Advisor partner to JLL / TCE)
5. Design and Access Statement – (prepared by the JLL / TCE Facilities manager in partnership with Capital Maintenance Ltd using the job report for remedial works recommended and the method statement for the proposed works)

- **Year planner | platform**

A planned maintenance program to address and undertake portfolio wide inspections and record identified issues or deficiencies is held on the digital platforms: Elogs and RiskWise systems.

Full access is always available to JLL / TCE. An example of this is in the lower appendices and this living document is made available to JLL / TCE at any point during the term of agreement.

- **Property Assets**

The total number of assets are captured on the planned maintenance programme and have been identified to the best of Capital Maintenance Ltd ability. This list of assets is the responsibility of JLL / TCE to review and ensure is in line with their own records and to highlight where necessary any discrepancies. This information is held and managed on Elogs for all parties to access and review.

9 TRAINING & AWARENESS

Specialised training for fire safety inspectors, engineers and consultants involves comprehensive knowledge of fire safety principles, regulations, and best practices. Here are key areas of specialised training for these roles:

- **Fire Door Regulations and Standards**

In-depth understanding of the local fire safety regulations, building codes, and standards relevant to fire doors.

Familiarity with the specific requirements for fire door construction, installation, maintenance, and repair outlined in the applicable codes and standards.

- **Fire Door Construction and Components**

Comprehensive knowledge of fire door construction, including various door types (e.g., solid, glazed, timber, steel) and their specific components.

Understanding the purpose and function of fire door hardware, such as hinges, locks, latches, closers, intumescent seals, and glazing systems.

- **Installation Techniques**

Proficiency in proper fire door installation techniques to ensure compliance with regulations and standards.

Knowledge of correct methods for fitting fire doors within frames, including alignment, clearance measurements, and sealing.

Understanding the importance of appropriate fixings, fasteners, and reinforcement to ensure the integrity of the fire door assembly.

- **Maintenance and Repair Procedures**

Expertise in fire door maintenance and repair procedures to keep fire doors in optimal working condition.

Knowledge of common issues and defects that may occur in fire doors, such as damaged seals, broken hardware, gaps, or warping.

Ability to assess and troubleshoot problems, identify appropriate repair methods, and execute repairs effectively.

- **Fire Door Testing and Certification**

Familiarity with fire door testing procedures and fire resistance ratings.

Understanding the interpretation of fire door test reports, including the ability to identify the limitations and capabilities of different fire doors.

Knowledge of certification schemes and labelling requirements for fire doors.

- **Health and Safety**

Awareness of health and safety regulations and best practices related to working with fire doors.

Knowledge of personal protective equipment (PPE) requirements and safe work practices when installing, maintaining, or repairing fire doors.

Understanding the potential risks and hazards associated with fire door engineering tasks and how to mitigate them.

Capital Maintenance fire door engineers undergo comprehensive training from reputable organisations, manufacturers and professional bodies specialising in fire door systems.

Certification programs and qualifications related to fire door installation and maintenance are held and managed by Capital Maintenance Ltd and uploaded for JLL / TCE to the Elogs platform at any time for review.

10 RECORD KEEPING

Record keeping for fire doors, including inspections and documentation, is crucial to ensure compliance, track maintenance activities, and demonstrate a proactive approach to fire safety. JLL / TCE have available to them, both 'Elogs' and 'RiskWise' as platforms that reports and inspections are held on for access at any time.

Below are guidelines for how Capital Maintenance Ltd manage this and the associated platforms.

Elogs hold the inspection reports (as shown by example in the appendices of this document) which are mirrored on RiskWise.

- **Inspection's, Maintenance, Non-conformities, & Corrective Records**

Elogs and RiskWise hold a record of all routine and annual inspections. These platforms hold maintenance and remedials records and reports of any non-conformities with recommended resolutions and are available to JLL / TCE to access at any time during the agreement. Information being uploaded into the RiskWise platform is the responsibility of JLL / TCE responsible person and then for Capital Maintenance to support on any action needing to be undertaken further.

- **Certification & Test Reports**

Records of fire door certification documentation, including test reports and certificates of conformity are always made available via the Elogs platform for JLL / TCE members. RiskWise is the responsibility of JLL / TCE to upload and update the associated documentation.

Store documentation related to fire resistance ratings, glazing specifications, and any other relevant certifications.

Ensure these records are readily accessible and organised for reference during inspections or audits.

- **BOSLTER**

TBC is a platform in discussion and establishment that will be mobilised in the coming months of 2023.

Items to consider for Bolster; Naming Convention to be done through the year for each door?

The combining of report / cert / inspection to be kept uniformed and shared through together at the same time.

To be used as the single and main reporting / paperwork tool to avoid multiple requests on items.

To hold the agreed asset list that will be reviewed between each party and

always made available to JLL / TCE.

- **Training Records**

Training records of compliant and vetted engineers and subcontractors are held with Capital Maintenance Ltd and updated according to any changes within the responsible personnel. These are made available to JLL / TCE at any point during the term of the agreement.

11 NON-COMPLIANCE & ENFORCEMENT

Non-compliance with fire door policies and regulations can have serious consequences in terms of safety, legal liability, and potential financial repercussions.

Below are consequences of non-compliance and the enforcement of a fire door policy:

- **Compromised Fire Safety**

The primary purpose of fire doors is to prevent the spread of fire and smoke. Non-compliant or poorly maintained fire doors can fail to perform their intended function, allowing fire and smoke to spread more rapidly throughout a building.

In the event of a fire, occupants may face increased risks to their safety, evacuation routes may be compromised, and the overall effectiveness of fire safety measures may be diminished.

- **Increased Risk of Property Damage**

Non-compliant fire doors can contribute to the rapid spread of fire and smoke, leading to increased property damage.

The lack of proper fire compartmentalisation due to non-compliant fire doors can result in the loss of assets, destruction of property, and increased difficulty for firefighting operations.

- **Legal and Regulatory Consequences**

Non-compliance with fire door regulations can result in legal and regulatory consequences. Building owners, responsible persons, or occupants may face fines, penalties, or legal actions for failing to meet fire safety requirements. Regulatory authorities may issue enforcement notices, improvement orders, or even require the closure of a building until the fire safety issues are rectified.

- **Increased Liability**

In the event of a fire-related incident, non-compliant fire doors can lead to increased liability for building owners, property managers, or responsible persons.

Failure to comply with fire door regulations and maintain fire doors properly may result in legal claims and lawsuits by affected individuals, including occupants, employees, or visitors who suffer injuries, loss, or damages.

- **Insurance Implications**

Non-compliance with fire safety regulations, including fire door requirements, may impact insurance coverage and premiums.

Insurers may require buildings to meet specific fire safety standards, and non-compliance can result in denied claims or increased insurance costs.

- **Reputational Damage**

Non-compliance with fire door policies and regulations can damage the reputation of building owners, property managers, or responsible parties.

News of fire safety violations or incidents can negatively impact public perception, tenant retention, and the ability to attract new occupants.

12 SERVICE LEVEL AGREEMENTS

The service level agreement (SLA) outlined in the Fabric Maintenance Service Specification, between Capital Maintenance Ltd and JLL establishes the standards and parameters by which services will be delivered, measured, and managed.

Capital Maintenance Ltd shall meet the Service Level Agreement in accordance with the desired response times and Key Performance Indicators ("KPIs") as set out in the service specification.

These are detailed below and are taken from the agreement for what is applicable to the Fire Door service and maintenance agreement.

- **Service Level Agreements**

The services shall be subject to review through the Capital Maintenance Ltd record keeping and the implementation of KPI's and associated Performance audits. SLA's are in line with the uploaded planned preventative maintenance regime on Elogs system as directed and instructed by JLL.

- **Key Performance Indicators**

A key performance indicator (KPI) is the measurable metric or data point that is used to assess the performance and effectiveness of the agreed fire door service specification between Capital Maintenance Ltd and JLL.

Capital Maintenance Ltd will complete a monthly KPI submission via the designated CAFM system (Elogs) and submit to the Service Contracts Manager /Service champion within JLL for discussion at the monthly meeting.

- 1 Contracted Hours: 100% fulfilled by appropriate staff
- 2 Proactive maintenance inspections 100% completed and on time.
- 3 Invoices: 100% accurate and on time.
- 4 Reactive Response: 95% complete and fully closed.

- 5 Reactive Completion: 90% complete and fully closed.
- 6 Planned Tasks: 100% complete and fully closed.
- 7 Is all site and staff documentation correct, valid and up to date
- 8 Reports: 100% Completed and on time.
- 9 Were any complaints unresolved or recurring.
- 10 Presentation: Were all staff dressed appropriately and representing JLL and the client positively.

13 PRICING

At Capital Maintenance Ltd we've explored the importance of developing a clear understanding of our customers and their values when purchasing a product or offering a service.

As part of this process we have identified that the JLL / TCE agreement requires the following specifications when maintaining or installing fire doors.

We have taken all data and benchmarked our own internal pricing structure to incorporate this.

- Company Accreditation: LPCB
- Level of competency for Fire door inspectors: FDIS approved inspector
- Level of competency for fire door installers: FDIS Diploma
- Company Insurance requirements: as per attached certificate reflected in the appendices of this document. These insurance certificates are reviewed yearly.
- Compliance membership: Avetta
- Waste carriers' licence: Environment Agency CBDU381055
- Certification: LPCB 1675Pla
- Reporting: LPCB Standard
- **Quote guideline**

Value	Contractor to quote
£1000 - £20,000	Capital Maintenance Ltd
£20,000 - £30,000	Capital Maintenance Ltd & approved contractor x1
£30,000 +	Capital Maintenance Ltd & approved contractor x 2

- All quotes received from our approved contactors are reviewed by our internal operations manager.
- All contractor quotes include a 10% contract mark up for works within scope of the agreement.
- All materials costs are charged at 8% contract mark up for works within scope of the agreement.
- All contractor quotes include a 12% contract mark up for works outside of the scope of agreement costings.
- All materials costs are charged at 10% contract mark up for works outside of the scope of agreed costs.
- All quotes expire after 30 days; this is due to fluctuating prices.
- If a quote is approved, on completion of the works a QC is carried out.
- Costs requirements for 2nd, 3rd quotes are not currently defined. Until this is confirmed, Capital Maintenance Ltd proposed to use the above table.
- Fire door inspection rate

Fire door inspection rate

£15 per door

All fire door inspections will be in accordance with LPCB Standard and Current regulations.

Our FDIS Fire door inspectors will use their best endeavours to report any unusual defect, misuse or alterations to the fire door sets whilst carrying out their inspections.

We always look for the most cost efficient but effective way to carry out the works. For example, we would not recommend repacking a door, changing its hinges, upgrading the door closer etc if the door looks like it is starting to warp and could potentially need changing on the next inspection. We would recommend a replacement at first instance to save the client paying out unnecessary funds the first time around. Although, in some instances, it is difficult to try and predict what may happen to the door in the future.

- **Internal rate for fire door maintenance**

Hourly rate

£85 for the first hour and then £45 per hour after

- **Estimates**

When estimating Capital Maintenance revert to the survey carried out to LPCB standard by our qualified surveyor which gives their professional opinion and highlights each door required remedial action.

Each door is looked at individually in the first instance. However, depending on the repetitiveness of the defect, Capital Maintenance would then look at the whole project, which enables us to reduce the cost accordingly giving the client a more competitive rate across the whole site in question. The reason this is sometimes made possible is due to continuity of works.

The estimates are broken down into materials, number of engineers and quantity of days to complete the project. We then attach the relevant site survey alongside the estimate.

- **Abortive Pricing**

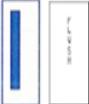
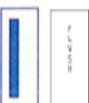
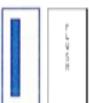
Inspections

£150 reattendance fee (for each additional visit for up to 10 doors - where unforeseen circumstances or access issues prevent a survey from being completed in a single visit. This fee will not apply if the scheduled amount of time for a site survey is not sufficient to complete surveys on all applicable doors.)

Remedial works

£150 aborted call out fee (where unforeseen circumstances or access issues prevent works from being carried out on the day as scheduled).

- **Internal schedule of rates for fire door installation**

ITEM REF	INTERNAL FIRE RATED <u>TIMBER</u> DOOR SETS - FD 30(e) and FD60(e) tested to BS 476 Parts 22 and 31.1 and/or BS EN 1634	UNIT	Labour cost	Material co
FD30	DOOR SET - Remove and dispose of existing doorset complete. Supply and install Fire Doorset as per manufacturer's installation instructions. Door to match as per specification and fitted with all ironmongery relevant to door tested to BS 476 Part 22 and/or BS EN 1634-1. Door to be supplied with copy of manufacture certification and door labelled or plugged to show compliance. Ironmongery to include 3No or 4No steel hinges CE marked and compliant with BS EN 1935; a self-closing device compliant with BS EN1154. Doorset to be complete with architraves both sides and			
FD30/001	 Door type a (with vision panels or flush) - FD30 Standard- 2.1M X 1M	Item		
FD30/002	 Door type b (with vision panels or flush) - FD30 - Above standard			
FD60/003	 Door type c (with vision panels or flush)- FD60 - Standard- 2.1M X 1M			
FD60/004	 Door type d (with vision panels or flush)- FD 60 - Above st			
FD30/005	Door type e - FD 30 double Standard double -			
FD30/006	Door type f - F30 double Ab			
FD60/007	Door ty			
FD60/008				

14 APPENDICES

Remedial works

- Planner: Elogs:** This is an example of how these planners are shown and operated on the Elogs system made available to all parties for review and updating / altering to suite.

Task ♦	Site ▲	Service Provider ♦	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	
Fire door inspection Annual - Apart- 1 Coloseum Terrace - BLOCK	1 Coloseum Terrace - BLOCK	Capital Maintenance Ltd - Passive Fi																													
Fire door inspection Quarterly - Con 1 Coloseum Terrace - BLOCK	1 Coloseum Terrace - BLOCK	Capital Maintenance Ltd - Passive Fi																													
Fire door inspection Six Monthly	1 New Burlington Place, London, W1	Capital Maintenance Ltd - Passive Fi																													
Fire door inspection Six Monthly	1 Vine Street (83- 97 Regent Street)	Capital Maintenance Ltd - Passive Fi																													
Fire door inspection Six Monthly	1-4 Vigo Street (Empire House) / 115	Capital Maintenance Ltd - Passive Fi																													
Fire door inspection Six Monthly	1-5 Hanover Street (229-247 Regent)	Capital Maintenance Ltd - Passive Fi																													
Fire door inspection Quarterly - Con 10 Cambridge Gate - BLOCK	10 Cambridge Gate - BLOCK	Capital Maintenance Ltd - Passive Fi																													
Fire door inspection Annual - Apart- 10 Cambridge Gate - BLOCK	10 Cambridge Gate - BLOCK	Capital Maintenance Ltd - Passive Fi																													
Fire door inspection Six Monthly	10 New Burlington Street	Capital Maintenance Ltd - Passive Fi																													
Fire door inspection Six Monthly	10 Piccadilly (16-18 Piccadilly, and 5)	Capital Maintenance Ltd - Passive Fi																													
Fire door inspection Six Monthly	10-12 Heddon Street	Capital Maintenance Ltd - Passive Fi																													
Fire door inspection Quarterly - Con 106 Jermyn Street - BLOCK	106 Jermyn Street - BLOCK	Capital Maintenance Ltd - Passive Fi																													
Fire Door Inspection Annual - Apart- 106 Jermyn Street - BLOCK	106 Jermyn Street - BLOCK	Capital Maintenance Ltd - Passive Fi																													
Fire door inspection Six Monthly	106-112 Regent St & 48 Warwick St	Capital Maintenance Ltd - Passive Fi																													
Fire door inspection Six Monthly	12 Charles II Street (Savannah House)	Capital Maintenance Ltd - Passive Fi																													
Fire door inspection Six Monthly	12 Little Portland Street (Langham)	Capital Maintenance Ltd - Passive Fi																													
Fire door inspection Six Monthly	13 Maddox Street Formerly 13-15 M	Capital Maintenance Ltd - Passive Fi																													

- Planner: RiskWise:** This is an example of how these planners are shown and operated on the RiskWise system made available to all parties for review and updating / altering to suite.

Actions Outstanding	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Health & Safety Events / Inspections												
Fire / Emergency Lighting (Non Critical Devt - Frequency - Annual)												
Fire / Emergency Lighting (Non Critical Devt - Frequency - Annual)												
Fire / Fire Alarm Service 01 5438-1 (Frequency - Quarterly / Monthly - Annual)												
Fire / Fire Risk Assessment (Frequency - Risk Based)												
General Health and Safety - Contractor Hazard Information Pack (CHP) (Frequency - Annual)												
General Health and Safety - Gas Safety Test (Frequency - Annual)												
General Health and Safety - General Health and Safety - Risk Assessment (Frequency - Annual)												
General Health and Safety - HLL - Hazard Unit Risk Assessment (Frequency - Risk Based)												
General Health and Safety - Users - Site Checks - TIC												
General Health and Safety - TIC (Frequency - Risk Based)												
All H&S Team - H&S Audit (Frequency - Risk Based)												
Residential / Annual Fire Entrance Door Checks												
Residential / Carbon Monoxide Detection Project and Ventilation (Frequency - Annual)												
Residential / Fire Alarm Detection 855334-3 (Residential Only) (Frequency - Annual)												
Residential / Fire Safety Instructions to Residents (Annual)												
Residential / Fire Plan Building Plan (Annual)												
Residential / Information to Residents about Fire Doors (Annual)												
Residential / Previews Information Box Check (Annual)												
Residential / Quarterly Common Fire Door Checks												

- Accreditations:** Current and in date business accreditation certification

 <p>LPCB®</p> <p>Certificate of Installer Approval Certificate Number: 1675PIa Issue: 01</p> <p>Capital Maintenance Ltd</p> <p>Holding complied with the requirements of the following: LPS 1271: Issue 2.0 Requirements for the UCB Approval and listing of companies providing construction elements used to provide fire protection in buildings.</p> <p>Choose an item:</p> <p>Company Address 207 Regents Street London WC1B 4HD</p> <p>Scope: Appendix 2 – Fire doors and fire curtains</p> <p>LPCB PREVENTION CERTIFICATION LTD</p> <p>This Certificate is maintained and held in force through regular surveillance activities.</p> <p>Mr David Fergusons Signature: [Signature] LPCB Ref: 1675PIa Page 1 of 1</p> <p>Mr David Fergusons Signed on behalf of Capital Maintenance Ltd 207 Regents Street, London WC1B 4HD Email: dferguson@capital-maintenance.co.uk LPCB is a registered trademark of the Building Research Establishment Ltd</p> <p>26 October 2021 26 October 2021 Date of Issue</p> <p>bre</p>	 <p>LPCB®</p> <p>Certificate of Approval Certificate Number: 1675PI Issue: 01</p> <p>Capital Maintenance Ltd</p> <p>Holding complied with the requirements of the following: LPS 1197: Issue 4 Requirements for the UCB Approval and listing of Companies inspecting, repairing, maintaining and/or partly assessing, installing, testing and certifying fire doors, fire curtains, shutters and related smoke barriers.</p> <p>Company assessed and approved for inspection, maintenance services and 'one off' general repair of the products listed below:</p> <p>Company Address 207 Regents Street London WC1B 4HD</p> <p>Products Fire Resistant Doors and Shutters Hinged and Pivot Steel Doors Hinged and Pivot Fire Curtains Hinged and Pivot Glass Doors</p> <p>LPCB PREVENTION CERTIFICATION LTD</p> <p>Choose an item:</p> <p>Mr David Fergusons Signature: [Signature] LPCB Ref: 1675PI Page 1 of 1</p> <p>Mr David Fergusons Signed on behalf of Capital Maintenance Ltd 207 Regents Street, London WC1B 4HD Email: dferguson@capital-maintenance.co.uk LPCB is a registered trademark of the Building Research Establishment Ltd</p> <p>12 October 2021 12 October 2021 Date of Issue</p> <p>bre</p>
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- Inspection Certificate:** An example of a certificate generated in line with the relevant regulation body and accreditation that Capital Maintenance Ltd holds.

 <p>LPCB®</p> <p>Certificate of Inspection LPS 1197: Issue 4.1 Requirements for the UCB Approval and listing of Companies inspecting, repairing and maintaining fire and smoke doors, shutters, curtains and active smoke barriers.</p> <p>Certificate No. 1675PI000279</p> <p>This certificate is issued by the LPCB to the approved company named in (1) of the schedule, for the period of (2) of the schedule for the following premises:</p> <p>18 King Street, London, SW1Y 6QU</p> <p>Schedule</p> <table border="1"> <tr> <td>Capital Maintenance Ltd</td> <td>1675PI</td> </tr> <tr> <td colspan="2">We, being satisfied the LPS 1197 is present of the recipient of fire doors and curtains, do certify that this inspection was carried out in accordance with LPS 1197 "Requirements for the UCB Approval and listing of Companies inspecting, repairing and maintaining fire and smoke doors, shutters, curtains and active smoke barriers".</td> </tr> <tr> <td>The Crown Estate</td> <td>131625</td> </tr> <tr> <td>CMFOSU20146</td> <td>21 March 2023</td> </tr> <tr> <td>Ricardo De Rossi, Fire Door Assessor Name, Position</td> <td>ROM Signature</td> </tr> <tr> <td>Capital Maintenance Ltd</td> <td>18 May 2023</td> </tr> </table> <p>LPCB PREVENTION CERTIFICATION LTD</p> <p>Page 1 of 2</p> <p>LPCB PREVENTION CERTIFICATION LTD</p> <p>Page 1 of 2</p>	Capital Maintenance Ltd	1675PI	We, being satisfied the LPS 1197 is present of the recipient of fire doors and curtains, do certify that this inspection was carried out in accordance with LPS 1197 "Requirements for the UCB Approval and listing of Companies inspecting, repairing and maintaining fire and smoke doors, shutters, curtains and active smoke barriers".		The Crown Estate	131625	CMFOSU20146	21 March 2023	Ricardo De Rossi, Fire Door Assessor Name, Position	ROM Signature	Capital Maintenance Ltd	18 May 2023	<p>LPCB®</p> <p>LPS 1197: Issue 4.1 Certificate of Inspection Certificate Number: 1675PI000279 Schedule Continued:</p> <p>Contract premises: 18 King Street, London, SW1Y 6QU</p> <table border="1"> <tr> <td>CMFOSU20146</td> <td>131625</td> </tr> </table> <p>Product manufacturer, product name, 3rd Party Approval (if approved), and fire performance</p> <table border="1"> <thead> <tr> <th>Scope of Works</th> <th>Location</th> </tr> </thead> <tbody> <tr> <td>Fire Door Inspection on Common Part doors</td> <td>All floors</td> </tr> <tr> <td>Type of doors</td> <td>FDS0, FD30, FD60, Nominal FD30 and Exit doors</td> </tr> <tr> <td>Number of doors</td> <td>55</td> </tr> <tr> <td>Doors passed</td> <td>21</td> </tr> <tr> <td>Doors failed</td> <td>34</td> </tr> </tbody> </table> <p>Works not completed or excluded</p> <table border="1"> <tr> <td>N/A</td> <td>Location</td> </tr> </table> <p>Ricardo De Rossi, Fire Door Assessor</p> <p>Name, Position Capital Maintenance Ltd Signature</p> <p>LPCB PREVENTION CERTIFICATION LTD</p> <p>Page 1 of 2</p> <p>bre</p> <p>W1197 Rev. 1.0 © BRE Global Limited, 2010</p>	CMFOSU20146	131625	Scope of Works	Location	Fire Door Inspection on Common Part doors	All floors	Type of doors	FDS0, FD30, FD60, Nominal FD30 and Exit doors	Number of doors	55	Doors passed	21	Doors failed	34	N/A	Location
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- Example Fire Door inspection Report:** An example of each area within a standard report for fire door inspections across the JLL / TCE portfolio



Fire Door Inspection Report

conducted for

JLL

Document No. CMFDISU20146 18 King Street
Location King Street
Audit Title 18 King Street Common Parts
Conducted on 21st March 2023
Prepared by CM Inspector, Capital Maintenance Ltd



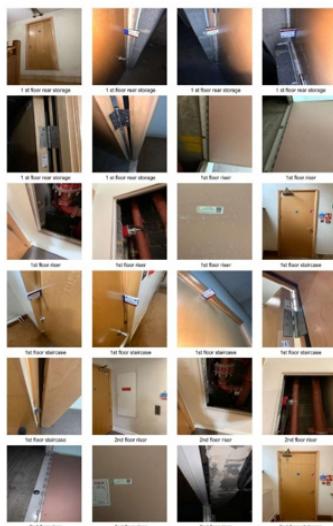
Page 1
Document ID: CMFDISU20146 18 King Street, Audit Title: 18 King Street Common Parts, Client: JLL.

Doors Overview

Legend: P = Passed, F = Failed, N/A = Not Applicable

Door ID	Barcode	Dimensions	Door Rating	Door Material	Frame Material	Door Type	Location	Frame Condition	Hinges Condition	Latchset Condition	Cross Condition	Seals Condition	Closer Condition	Signage Condition	Gaps Condition	Door Condition
1st floor rear storage	cmfd 0636	1740x826x44	FD30	Wood	Wood	Single	1st rear	P	P	P	N/A	P	P	P	P	P
1st floor rear	cmfd 0668	1485x585	FD60	Metal	Metal	Single	1st floor	P	P	P	N/A	P	N/A	F	N/A	P
1st floor staircase	cmfd 0442	2300x986x44	FD30	Wood	Wood	Single	1st floor	P	P	N/A	P	P	P	P	P	P
2nd floor rear	cmfd 0444	1485x585	FD60	Metal	Metal	Single	2nd floor	P	P	P	N/A	F	N/A	P	F	NA
2nd floor staircase	cmfd 0403	2300x900x15	FD30	Wood	Wood	Single	2nd floor	P	P	N/A	N/A	P	P	P	P	P
3rd floor smoke vent 2	cmfd 1931	2040x1000x50	FD60	Metal	Metal	Single	3rd floor	P	P	P	N/A	N/A	P	P	N/A	P
3rd floor rear	cmfd 0446	1485x585	FD60	Metal	Metal	Single	3rd floor	P	P	P	N/A	F	N/A	P	F	NA
3rd floor smoke vent	cmfd 1630	2040x1000x50	FD60	Metal	Metal	Single	3rd floor	P	P	P	N/A	N/A	P	P	NA	P
3rd floor staircase	cmfd 0445	2295x900x44	FD30	Wood	Wood	Single	3rd floor	P	P	P	N/A	P	P	P	P	P
4th floor rear	cmfd 0448	1485x585	FD60	Metal	Metal	Single	4th floor	P	P	P	N/A	F	N/A	P	F	NA
4th floor smoke vent	cmfd 3212	2040x1000	FD60	Metal	Metal	Single	4th floor	P	P	P	N/A	N/A	P	P	P	P
4th floor smoke vent 2	cmfd 3211	2045x1000x45	FD60	Metal	Metal	Single	4th floor	P	P	P	N/A	N/A	P	P	P	P
4th floor staircase	cmfd 0447	2295x900x44	FD30	Wood	Wood	Single	4th floor	P	P	P	N/A	P	P	P	P	P
5th floor rear	cmfd 0450	1485x585	FD60	Metal	Metal	Single	5th floor	P	P	P	N/A	F	N/A	P	F	NA
5th floor staircase	cmfd 0449	2085x900x44	FD30	Wood	Wood	Single	5th floor	P	P	P	N/A	N/A	P	P	P	F
6th Floor fire exit 2	cmfd 0557	2041x844x54	FD60s	Wood	Wood	Single	6th floor	P	F	N/A	P	F	P	P	F	F
6th floor Lobby	cmfd 0454	2042x845x54	FD60	Wood	Wood	Double	6th floor	P	P	P	F	P	P	P	F	F
6th floor corridor	cmfd 0455	2026x926x54	FD60s	Wood	Wood	Single	6th floor	P	P	P	N/A	P	P	P	P	P
6th floor fire exit 1	cmfd 0456	2040x926x54	FD60	Wood	Wood	Single	6th floor	P	P	P	N/A	P	P	P	P	P
6th floor riser	cmfd 1628	1845x1445x54	FD60	Wood	Wood	Single	6th floor	P	P	P	N/A	P	N/A	P	P	P
6th floor roof access	cmfd 0092	2035x725x54	FD60s	Wood	Wood	Single	6th floor	F	P	P	N/A	P	P	P	P	F
6th floor sprinkler	cmfd 0451	1847x677x54	FD60	Wood	Wood	Single	6th floor	F	P	P	N/A	P	N/A	P	P	P
6th floor staircase access	cmfd 0453	2032x627x54	FD60s	Wood	Wood	Single	6th floor	P	P	N/A	P	P	P	P	P	P
7th floor lift motor room	cmfd 0604	1653x363x44	FD30	Wood	Wood	Single	7th floor	P	P	P	N/A	P	N/A	F	P	P
7th floor plant room	cmfd 0665	1405x353x44	FD30	Wood	Wood	Single	7th floor	P	P	P	N/A	P	P	P	P	P

Door Images



Door Fault Summary

1st floor riser

SIGNAGE - (Comment: No signage). **DOOR FAILED** - (Comment: missing signage, missing cold smoke seal). **Additional Inspector notes:** Recommend install signage, install cold smoke seals.

2nd floor riser

SLEADS - (Comment: Not installed). **SIGNAGE** - (Comment: No signage). **DOOR FAILED** - (Comment: Missing signage, no cold smoke seal). **Additional Inspector notes:** Recommend install signage, install cold smoke seals.

3rd floor riser

SLEADS - (Comment: No smoke seals). **SIGNAGE** - (Comment: No signage). **DOOR FAILED** - (Comment: Missing signage, no cold smoke seal). **Additional Inspector notes:** Recommend install signage, install cold smoke seals.

4th floor riser

SLEADS - (Comment: No smoke seals). **SIGNAGE** - (Comment: No signage). **DOOR FAILED** - (Comment: No signage, no smoke seal). **Additional Inspector notes:** Recommend install signage, install cold smoke seals.

5th floor riser

SLEADS - (Comment: No smoke seals installed). **SIGNAGE** - (Comment: No signage). **DOOR FAILED** - (Comment: Missing smoke seals and signage). **Additional Inspector notes:** Recommend install signage, cold smoke seals.

5th floor staircase

GAPS - (Comment: Excessive gaps). **DOOR FAILED** - (Comment: Excessive gap). **Additional Inspector notes:** Recommend close and adjust.

6th floor exp 2

HINGES - (Comment: Non compliant). **SEALS** - (Comment: Partial). **GAPS** - (Comment: excessive gap). **DOOR FAILED** - (Comment: Excessive gaps). **Additional Inspector notes:** Ease end adj gaps, replace interlocked strip 20mm.

6th floor Lobby

SEALS - (Comment: Misaligned). **GAPS** - (Comment: Excessive gaps). **DOOR FAILED** - (Comment: Door fail damaged). **Additional Inspector notes:** Ease door damaged. Recommend repair.

6th floor roof access

FRAMING - (Comment: low attachment). **GAPS** - (Comment: Excessive gaps). **DOOR FAILED** - (Comment: Excessive gaps, archivite loose). **Additional Inspector notes:** Frame attachment, ease and adjust gaps.

6th floor sprinkler

STRUCTURE - (Comment: Sprinkler pipe dry piping). **DOOR FAILED** - (Comment: exposed liner). **Additional Inspector notes:** Recommend to close all penetration around items with zip wire and put plaster.

7th floor lift motor room

STRUCTURE - (Comment: exposed liner). **DOOR FAILED** - (Comment: exposed liner). **Additional Inspector notes:** Recommend to close the structural liner with zip wire plaster.

7th floor roof access 1

GAPS - (Comment: Excessive gaps). **DOOR FAILED** - (Comment: excessive gap). **Additional Inspector notes:** Recommend close and adjust.

Basement door 1

GAPS - (Comment: Door twisted). **DOOR FAILED** - (Comment: Door twisted). **Additional Inspector notes:** Door twisted recommend replacement.

Basement electric intake room

HINGES - (Comment: bad hinge). **DOOR FAILED** - (Comment: door delaminating, cold hinge). **Additional Inspector notes:** Recommend to replace hinge and the locking back plate.

- Insurances:** Current and in date business insurance certification. (Fire is covered in this policy)

Flint Insurance

Flint Insurance

Crayfield House
Crayfield Industrial Park
Main Road, Oxtonge,
Bury St Edmunds IP21 7EP
B115 3HP
Telephone: 0345 309 5000
Fax: 0345 3711450
(All Calls are charged at Local rate)

CONFIRMATION OF INSURANCE

Policy Holder: Capital Maintenance Ltd
 Business Description: Building Contractors - Alterations, Repair, Maintenance, Installation and Manufacture of Metal Eye Bolts
 Insurer: Public & Product Liability Argenta Syndicate 2221 at Lloyds & QBE via Thames Underwriting Ltd
 Policy Number: THNAME/2023/3448 & TUG/2023/7137
 Cover Date: 13/07/2022 To 30/07/2023
 Limit of Indemnity: £10,000,000 in any one event & in the aggregate
 Insurer: Employers Liability Argenta Syndicate 2221 at Lloyds via Thames Underwriting Ltd
 Policy Number: THNAME/2023/4546
 Cover Date: 13/07/2022 To 30/07/2023
 Limit of Indemnity: £10,000,000 in any one event
 Insurer: Contractors All Risks XL Certificate Syndicates Underwriting Ltd
 Policy Number: TUC/2921/7598
 Cover Date: 31/07/2022 To 30/07/2023
 Contract Works: £30,000,000 Maximum Contract Price
 Indemnity Period: 12 Months
 Head In Part: £30,000 any one occurrence
 Confirming New Charges:
 Professional Indemnity Asserment via CUNA Underwriting Ltd
 Policy Number: 6599721219
 Cover Date: 13/07/2022 To 30/07/2023
 Limit of Indemnity: £2,000,000 in the aggregate including costs and expenses

Note to contractor
 This document is sufficient evidence to your principal of the existence of the above insurance arrangements.
 Do not part with your original policies. Please retain this original and send copies to any principal.

Signed: 

Dated: 01 August 2022

Name: Scott Englefield

Position: Commercial Account Handler

All policies in force up to stated Renewal Dates
 1. General Principals Clause &/or equivalent included
 2. Subject to policy terms, conditions and exceptions
 3. A. All policies are subject to underwriting
 4. Alterations/Cancellation may occur during the period
 5. Current position will be confirmed on request

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 Head Office: Crayfield House, Crayfield Industrial Park, Main Road, Oxtonge, Bury St Edmunds IP21 7EP. Registered in England no. 03379096

2.15 TEMPORARY WORKS, SCAFFOLDING AND HOARDINGS POLICY

INTRODUCTION

Capital Maintenance Ltd has incorporated a Temporary works, Scaffolding & Hoarding Policy, which aligns with The Crown Estate (TCE) minimum requirements to ensure safe working arrangements across a range of high risk tasks.

Capital Maintenance as a Principal Contractor of TCE appoints Subcontractors subject to internal assurance that assesses them to be competent. As such, this document does not prescribe controls and management arrangements expected of a competent contractor, which must be subject to their own risk assessment and safety management processes.

Rather, herewith are mandatory requirements which Capital Maintenance deems necessary to help ensure safeworking and which are commensurate with our ‘Safety First’ approach.

These minimum requirements are not exhaustive and do not preclude the contractors maintaining industry standards, upholding statutory obligations and delivering higher standards and continuous improvement.

SCOPE

This document outlines the requirements for scaffolding and hoarding installations, inclusive of proprietary and non-proprietary solutions. The requirements specifically relate to the erection and maintenance of scaffolding and hoardings and considers the use of public spaces, (pavements and highways in particular), and management of the public interface.

This document must be read in conjunction with the following, and their corresponding requirements must be upheld;

- Capital Maintenance Safety Management System (SMS) and all relevant procedures contained within;
notably HSP 11, Working at Height, Health & Safety Policy
- Temporary works procedure managed by the Principal Contractor
- Applicable local authority standards

The requirements of local government, tenants and other stakeholders should be considered and foreseeable non-compliance with these requirements should be brought to the attention of the Capital Maintenance Health and Safety Manager.

This standard applies to steel and aluminium tube and fitting scaffolds and includes the use of system type components such as “Readylok” or “Easyfix” transoms, extending transoms, ladder beams and unit beams. Further, this standard applies to scaffold components used for edge protection, whether it be around excavations, shafts, or roofs etc.

All scaffolds shall be erected in line with TG20:21 using associated compliance sheets. Where this is not possible, they shall be deemed a bespoke scaffold and shall require a temporary works design. Central to managing related risks is a robust temporary works management process.

MOBILE SCAFFOLD TOWERS

All mobile scaffold towers must be controlled using a tagging system that shows:

- To whom the tower belongs
- Who erected the tower
- The date of the last inspection

A PASMA-trained operative must erect and inspect mobile scaffold towers, according to the manufacturer’s instructions.

SYSTEM SCAFFOLDS

All system scaffolding must conform to the relevant British and European Standards BS EN 12810/12811. Scaffolders must be trained, competent and hold the relevant certificates for the system in use.

All system scaffolding is to be erected in accordance with the manufacturers or supplier’s design manual / erection guide or be subject to a specific design by a competent Temporary Works Designer.

Any proposed modifications, or alterations, outside a system scaffolding manufacturer’s guideline must be designed by a competent Temporary Works Designer.

The relevant installation / erection guidance from the manufacturer or supplier of the system scaffold must be obtained and must be held on site as part of the Temporary Works records, whilst the system scaffold is being erected, used and dismantled.

SCAFFOLDING

IDENTIFICATION OF SCAFFOLDING REQUIREMENTS

Capital Maintenance will provide a Temporary Works Design Brief to the scaffold designer and scaffold contractor. This will include detail of known hazards, but it is incumbent on the designer and scaffold contractor to perform their own due diligence in surveying the site in preparedness for design and construction. Information provided must not be considered exhaustive.

Scaffold designers are reminded to consider ground loading capacity, voids, electrical assets and mitigate touch potential and other risks.

Capital Maintenance Specific Planning Requirements:

Where contractually required, separate hoarding requirements will be specified by Capital Maintenance, as per TCE policy. in writing to the relevant contractors, notwithstanding this, the following requirements are to be met;

- Confirm, where appropriate, the necessary consents and Scaffold Licence have been obtained from local government. These consents may stipulate delivery slots, noise and nuisance stipulations, requirements for pit-lanes etc. Liaison with Capital Maintenance Public Realm and Urban Infrastructure team may be warranted.
- Consider clearances required by statutory authorities, service providers, roads, railway, power lines, etc. Consider notification requirements of infrastructure owners in respect of interfaces with rail, highways and waterways.
- Marketing and branding considerations must be accounted for. Large scale projects should engage with Capital Maintenance Marketing and Branding to determine any project specific needs.
- Ensure the scaffolding is erected in such a way that minimises detrimental impact of occupying tenants. Retail and restaurant windows are to be left visually unobstructed by maintaining clear spans, where

possible, especially at ground floor and lower levels.

- Additional signage for retailers may be required for the contracted works, where this is required it will be stated in the contractual requirement for the contractors undertaking the works.
- Design out potential for rough sleepers. Consideration must be given to hoarding of vertical standards and the spaces created between them, whilst also mitigating the security risk uninterrupted hording presents. Avoid constructing fully enclosed hoarded areas to mitigate anti-social behaviour, risk to public security and impaired visibility of shop frontages; unless with prior agreement it is deemed necessary to mitigate circumstantial holistic risk.
- Account for particular requirements of the visually impaired and use of push-chairs and similar. Routes shall be appropriately lit and signed. Consider tactile infrastructure where reasonably practicable. Exposed scaffold elements shall be encased or “cushioned” as necessary to prevent harm to pedestrians. Walking routes shall be of appropriate width to allow ease of passage of all user types.
- Logistics arrangements must be considered in advance, risk assessed and must not be adversely detrimental to the interests of Capital Maintenance, TCE or occupying tenants. All effort should be made to keep stakeholders informed and to accommodate reasonable requests.

CAPITAL MAINTENANCE SPECIFIC Design REQUIREMENTS

These requirements are expected to be met under typical circumstances. If circumstances are such they cannot be met, (or can no longer be met), the subcontractor is responsible for bringing this to the attention of Capital Maintenance, who will inform TCE Health and Safety.

- Where possible, access to scaffold platforms above the 1st lift is to be provided by use of a system staircase. To comply with the Work at Height Regulations, the following hierarchy is to be implemented in priority order, and variation from this hierarchy must be subject to risk assessment and justification must be documented;
 - o System staircases except for tube and fit type treads (unless agreed with the Capital Maintenance Health & Safety Manager).
 - o Independent Ladder access towers, with single lift ladders.
 - o Internal single lift ladders to access the working platform.

- o External ladders (Max height 4.5metres).
- Provide for Structural Engineer(s) reports and/or calculations for any scaffold bearing onto support walls, basement vaults, beneath pavement lights, propping scaffolding above, etc.
- All signage and protective sheeting used to enclose assets, and other such items that are vulnerable to inclement weather must be subjected to wind loading calculations (with due consideration, where applicable, for added vortex effect common to structures in high density urban configurations).
- Provide timber hoarding to all vertical standards at ground level to a minimum height of 2000mm, where headroom allows. The hoarding is to sit flush with the face of the building as close as reasonably possible without incurring damage.
- Access to scaffold platforms above the 1st lift is to be provided by use of a system staircase where possible.
- Each scaffold lift must be secured and fully boarded, including toe boards and handrails. All toe boards shall have a minimum of two clips. Two layers of ply boarding with (LPS 1215) polythene sheeting in between are to be provided to the first lift above any entrances at ground level to prevent dust or debris falling between boards. Elsewhere, overlapping boards (or sheeting over with ply) is preferred to mitigate material falling between gaps and slips and trips. Anti-slip strips should be used where they may be of benefit.
- Exterior sheeting (commonly Monarflex) is installed on all lifts except ground level which must remain open for fire and emergency considerations. Consideration should be given to branding the sheeting as per direction given by the Capital Maintenance Brand and Marketing team.
- All sheeting and hoarding materials meet LPS 1215 standard.
- Provide scaffolding fans at suitable levels and of a size befitting of the overall installation.
- Provide adequate lighting at all levels. Avoid blind spots at ground floor level where access to entrance doors and fire escapes is to be maintained.
- General access scaffolds shall not be used for concentrated loading of materials, specifically designed loading platforms must be erected for this purpose.
- Internal openings in the platform for ladders will be 600mm long from the front of the ladder and 450mm wide. A handrail must be fitted around the opening and a ladder gate in place.

- 16ft scaffold tubes are the maximum length permissible. 21ft scaffold tubes are prohibited.
- Ladder trap doors are prohibited.
- Ladder self-closing gates are permitted and must be installed to mitigate falls from height.
- Display Samaritans signage on all external scaffolding inclusive of their emergency contact number for persons in distress.
- The scaffold design should be in accordance with the relevant NASC design criteria (e.g. TG20) or requires bespoke temporary works design.
- Capital Maintenance emphasises the need to detail hazard warning information on the design drawings, which should correlate to the risk assessment for the scaffold and information contained in the Temporary Works Register.
- All scaffold components, its design and construction must conform to the requisite British Standard; see Appendix A.

CAPITAL MAINTENANCE SPECIFIC SECURITY REQUIREMENTS

- Provide a fully operational security alarm to the scaffolding. The system is to include passive infra-red movement detection (or similar) linked to a strobing and audible alarm fixed to the front of the scaffolding. Warning signage must be placed on the scaffold and the alarm must be connected to a 24-hour manned line with security presence for each and every activation of the alarm.
- Access ladders are to be enclosed and secured at all times, and where this is not feasible the contractor must liaise with the Capital Maintenance Health and Safety Manager. If unable to enclose, a lockable scaffold access hatch should be fitted to the first lift to deter unauthorised entry. Where full physical perimeter security is impractical, access ladders potentially accessible to the public at ground level are to be securely stored at high level when not in use and/ or unsupervised.
- Suitable anti-climb measures shall be instigated and supervised and must not detrimentally impact the public. Anti-climb paint should not be applied in areas of public interface. Anti-climb solutions should not be in prominent view of to the public and must be accompanied by appropriate hazard warning signage. In other areas anti-climb solutions are to be risk assessed for inclusion.

MANAGING (SCAFOLD) TEMPORARY WORKS

Unless a scaffold is assembled to a generally recognised standard / configuration, e.g. NASC's TG20 Series or similar guidance from manufacturers of system scaffolds, the scaffolding shall have an bespoke design, by a competent person, this is to ensure that scaffolding will meet the requirements of the works to be performed with minimal risk to anyone during the construction, use and dismantling phases.

All designs must be annotated as “Issued for construction” once finalised.

The (Principal) Contractor is responsible for coordinating a robust temporary works process that assures non-proprietary temporary works are in line with BS 5975, the essentials of which include;

- of suitable and sufficient design
- assessed for loading capacity inclusive of wind loading, with specific consideration
- given to sheeting wrap and proposed signage and marketing materials
- risk assessed and suitably justified in consideration of the Working at Height
- hierarchy of control
- recorded on a live Temporary Works Register that records approvals, justification,
- and is used to de-conflict works
- approved and monitored by a competent Temporary Works Coordinator
- managed on site by a competent Temporary Works Supervisor
- Complemented by a suitable and sufficient Safe System of Work including risk
- assessment covering related tasks

Scaffold contractors must:

- Be members of NASC
- Employ a full-time supervisor who must possess a valid Construction Industry Scaffolders

Record Scheme (CISRS) Advanced Scaffold card and SMSTS as a minimum, in addition to any certification required for a site manager/ supervisor described elsewhere in the Capital Maintenance Safety Management System.

When erecting scaffolding:

- It must follow NASC TG20 guidelines wherever possible, See Appendix A
- A compliance sheet must be completed to show scaffolding achieves TG20 and BS EN 12811 standards
- Staircases are the preferred means of access, e.g. Haki / Layher
- Ladders must only be used as access from one level to another if a staircase has been proven to be unsuitable or for erecting scaffold purposes only.
- All ladders installed to form access as part of a scaffold, must be installed and tied off by a competent scaffold erector, in line with SG25. This includes the use of ladders under any erection phase
- Scaffolders must follow NASC SG4 guidelines to prevent falls.
- Install a “Contractor Name Board” with the 24-hour emergency contact number in a prominent position on the scaffold. All signage must be assessed for risk associated with wind loading.

Before first use or after alterations:

- An advanced scaffold erector, scaffold health and safety manager or must perform an inspection.
- Any assembly, alteration and dismantling must be performed by trained persons, under the supervision of a competent person in accordance with NASC standards (See ‘Competency Requirements’ below).
- Any alterations must be accompanied by an amended, approved design and recommissioned by the scaffold contractor, with oversight of the Principal Contractor and notification to the client. (See ‘Competency Requirements’ below).
- If altered, or once struck for dismantling, trades other than scaffolders are not permitted to access the scaffold unless it is first re-inspected and confirmed as conforming to a corresponding temporary works design.
- Scaffold must be suitably earthed and bonded so to mitigate the impact of lightning and touch potential.
- Scaffolds must be appropriately tagged with a Scafftag or equivalent.
- A handover certificate must be issued and retained by the Principal Contractor
- Records must be retained for the life of the construct inclusive of all alterations and are to be made available to the client or her nominated assurance partner for audit on request.
- A suitable and sufficient rescue plan must be in place for the lifecycle of

the construction accounting for all foreseeable eventualities. Personnel must be suitably briefed on this plan, with records retained.

Allowing for installations not compliant with TG20

- Where it is not possible to comply with TG20, the Principal Designer (at the planning phase) or subcontractor must inform Capital Maintenance as Principal Contractor for onward guidance and assurance of temporary works.
- All scaffold works outside the scope of TG20 shall be approved by a competent engineer of the Principal Contractors' choice prior to it being erected.
- The design must ensure that safe erection and dismantling techniques can be implemented throughout the project. Design drawings and RAMS must be produced, and signed off as approved in line with BS5975.
- See Appendix B for scaffold types considered non-standard and requiring bespoke design.

MANAGING THE PUBLIC INTERFACE

Hours of Work

When undertaking work in a public area,

- Planning must prioritise delivering the work in 'out of office' hours to minimise risk to the public interface.
- Setting out and erecting up to and including the protection gantry must be completed during 'out of office' hours, most likely at night, and certainly when there is significantly reduced footfall.
- This does not preclude the need for other controls. Regardless of the time of day, the work area must be fully excluded, signed, and marshalled. All other requirements of this process apply.
- Once the protection gantry is fully installed as per design the rest of the elevation can be installed during normal hours, subject to the methodology herein described.
- The above must be accounted for in risk assessment. Additional requirements in the form of lighting at the point of work, fatigue management and security and welfare management must be accounted for.

The Protection Gantry

A protection gantry must be erected in all instances, and where possible, it must be full length to create a safe passage for the public whilst works are being carried out.

Where scaffolding is being erected, altered or dismantled, physical segregation (i.e. Chapter 8 barriers, Heras fencing) must be in place to protect the general public and divert passers-by away from the area. A banksman must also be deployed throughout. Warning and directional signage must be in place at pavement level for the entire duration of the task.

Vehicular protection must be provided in accordance with the risk assessment for the works and the Temporary Works Co-ordinator's instructions.

During construction / dismantling of any scaffolding it must not be left unattended without adequate security, signage and measures to prevent unauthorised access.

Pavement lifts shall comply with the following:

- The maximum bottom lift height will be 2.7m;
- The minimum bottom lift height will be 2.3m; and
- All standards protected with foam.

To protect the public, prioritise the use of Proprietary System Scaffolds, where possible, as less components are used, so reducing the risks of dropping loose fittings.

To protect the public, the following must be allowed for:

- Brick-guards, netting, sheeting, safety net fans and protection fans;
- Lighting and intruder alarms to be fixed the scaffold; and
- Redirecting the public away from the scaffold using physical barriers and marshalling.

Regarding the protection gantry:

- The bottom lift will be double boarded with sheeting sandwiched between the boards.
- There must be no gaps between the face of the building and the scaffold, where materials could fall onto the pavement: and
- There should be yellow plastic protection base pads under each base

plate

PROTECTION FANS

When it is not possible to erect a full-length protection gantry, the scaffolding contractor must make provisions for scaffold protection fans AND safety catch nets.

Scaffold protection fans must be included within the design and must consist of the following:

- A minimum 2 scaffold board upstands affixed to the perimeter of the fan itself.
- Scaffold boards fully secured by use of scaffold board clips.
- Fans must be repositioned, or additional catch fans installed as the scaffold works progress.

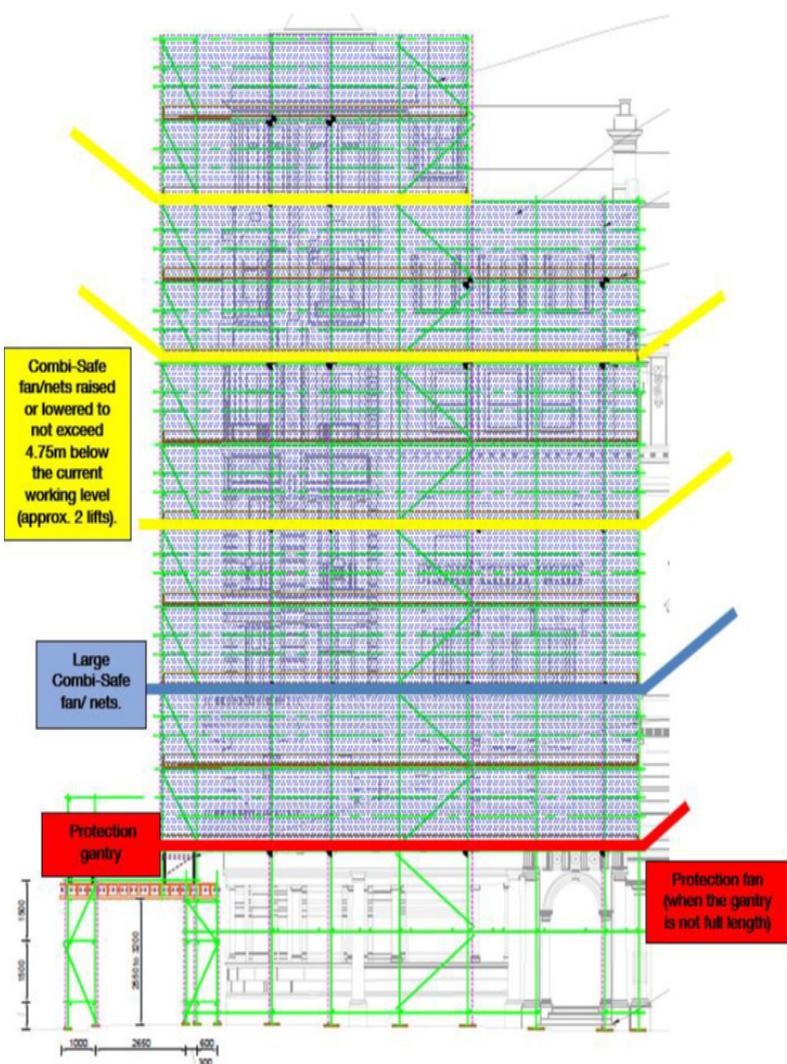
SAFETY CATCH NETS

Safety catch nets must be used when using scaffold protection fans and must be repositioned (raised or lowered) as scaffold erecting or dismantling progresses. This is primarily to catch any dropped items when working to erect or dismantle the protection fans.

Maximum distances between the scaffold catch net MUST NOT exceed 4.75m below the current working level.

During erecting and dismantling, a safety catch net must be installed no greater than 4m above the protection gantry as soon as it is feasible and safe to do so. This safety catch net must remain in place until lifts above it are fully erected or dismantled. This is to protect against dropped objects falling onto and ricocheting off the protection gantry.

Please refer to the following illustration.



EDGES AND OPENINGS

To help prevent slips, trips and falls, and falling from height:

If the construction is steel framed, subcontractors must install edge protection on beams before they are lifted into place and secured.

- All openings must be clearly marked with permanent markings, and refreshed as necessary
- Staircases must have a handrail system in place
- Netlon-type fencing and barrier tapes are not allowed to be used as edge protection or as barriers for restricted areas
- Guardrail heights must be a minimum of 950mm from the working platform and any gap between the top and intermediate handrail must not exceed 470mm.

Falling Materials and Tool Tethering

Contractors are to:

- Store all items used at height in a suitable manner to prevent them from falling. Equipment and materials must not be stored in stairwells, access points nor on emergency routes.
- Perform a risk assessment for the need of clear zones adjacent to guard rails. Clear zones should be a minimum of 1m from the guard rail and must be physically marked out
- Attach tools to tethers and suitable anchorage points if there is a risk of them falling from height
- Tether secondary attachments, e.g. secure a socket on a ratchet with a pin
- Where items cannot be secured during use, it will be necessary to create exclusion zones that are:
 - Demarcated
 - Labelled
 - Maintained until the risk is removed
- Suitable to contain any falling item based on an assessment (e.g. height and potential deflection)
- Materials and equipment should not be stored upon scaffold unless in a designated, dedicated area subject to risk assessment. The area should be under a Permit to Load and controls to mitigate the added risk of items falling from height must be accounted for.

COMPETENCY REQUIREMENTS

Competency cards should be held by the operative and readily available on site for audit. TCE and Capital Maintenance reserves the right to deny access to site and/or suspend works should compliant, in-date credentials not be readily available for evidence of competency.

All training must be recorded, filed and readily available for audit.

Scaffolding Designers

Scaffolding Designers must have suitable and sufficient training and experience in the design function, this may be a CISRS card (i.e. Advanced Scaffolder) for standard designs. More complex designs will require sign off by a competent Design Engineer.

Erecting, Dismantling and Adapting Scaffold (TG20 compliant and non-standard)

Post Holder	Minimum Competency Requirement
Person in Charge	CISRS Advanced Scaffolder SMSTS certification Emergency First Aid at Work (1 day course) with less than 6 operatives First Aid at Work (<u>3 day</u> course) for greater than 6 operatives Mental Health Awareness Training.
Lead Scaffolder	CISRS Advanced Scaffolder Card
Ratio of Supervisor to Operatives	1 supervisor to 6 operatives.
Team Members	Other team member must have one of the following cards: i. CISRS Advanced Scaffolder ii. CISRS Scaffolder iii. CISRS Trainee Scaffolder iv. CISRS Scaffolding Labourer Note: Any work involving system scaffold require a minimum of 1 operative trained in the specific system per every 6 operatives.

All persons required to work at height must have received training in working at height proportionate to their role and the risk they are exposed to.

All scaffolders must have received, as a minimum, training in SG4 –The Use, Maintenance and Inspection of Harnesses and Awareness of Rescue Techniques.

Where in use, the relevant level and type of IPAF (International Powered Access Federation) certification must be held by users of MEWPs (Mobile Elevated Working Platforms).

Where mobile towers and platforms are in use, installers must hold PASMA (Prefabricated Access Suppliers and Manufacturers) certification.

COMPETENCE IN RESCUE

Whilst scaffolders are using individual fall protection equipment (e.g. harness) two persons trained in related rescue methodology must be available on site to affect a rescue should an emergency arise.

SCAFFOLD INSPECTION

Scaffold inspectors must possess an Advanced Scaffold Inspection CISRS Card.

SCAFFOLD RELATED INCIDENT REPORTING

Accidents and incidents are to be reported to Capital Maintenance as per HSS0301, Incident Reporting, Escalation and Investigation.

Further, related dangerous occurrences as cited by RIDDOR 2013 must be reported immediately to the Health and Safety Executive and Capital Maintenance, who will subsequently report RIDDOR occurrences to TCE Health and Safety Manager.

RIDDOR cites two related dangerous occurrences, namely;

- The collapse, overturning or failure of any load-bearing part of any lifting equipment, other than an accessory for lifting.” (Schedule 2, Part 1, Paragraph 1)
- The complete or partial collapse (including falling, buckling or overturning) of:
 - i. a substantial part of any scaffold more than 5 metres in height;
 - ii. any supporting part of any slung or suspended scaffold which causes a working platform to fall (whether or not in use); or
 - iii. any part of any scaffold in circumstances such that there would be a

significant risk of drowning to a person falling from the scaffold.

Under such circumstances accident investigation protocols will be activated, immediate quarantining of the site will be enforced once it is safe to do so; and consideration will be given to activating the Capital Maintenance Crisis Management response protocol.

APPENDIX A

a) Scaffolding must also comply with relevant BS and industry standards in current use. The contractor is responsible for ensuring the currency of such standards. For guidance, at the time of writing, the items listed below is considered most pertinent:

- i. BS EN 1004:2004—Mobile Access and Working Towers Made of Prefabricated Elements— Materials, Dimensions, Design Loads, Safety and Performance Requirements
- ii. BS EN 12811-1:2003 Temporary Works Equipment, Scaffolds, Performance Requirements and General Design.
- iii. BS EN 12810-1:2003 Temporary Works Equipment. Scaffolds. Performance Requirements and General Design.
- iv. BS EN 12810-2:2003 Facade Scaffolds made of Prefabricated Components. Particular Methods of Structural Design.
- v. BS 5974:2017 Planning, Design, Setting Up and Use of Temporary Suspended Access Equipment. Code of Practice
- vi. BS 5975:2008+A1:2011 - Code of Practice for Temporary Works Procedures and the Permissible Stress Design of Falsework
- vii. BS 1139-6:2014 - Metal Scaffolding. Prefabricated Tower Scaffolds Outside the Scope of BS EN 1004, but Utilizing Components from such Systems. Specification.
- viii. BS EN 13374:2013 - Temporary Edge Protection systems. Product Specification. Test Methods.

b) The scaffolding components must also comply with relevant BS and industry standards, most notably:

- i. BS 2482:2009 - Specification for Timber Scaffold Boards.
- ii. BS EN 74-1:2005 - Couplers, Spigot Pins and Baseplates for Use in Falsework and Scaffolds. Couplers for Tubes. Requirements and Test Procedures.

- iii. BS EN 39:2001 - Loose Steel Tubes for Tube and Coupler Scaffolds. Technical Delivery Conditions.
 - iv. BS 1139-2.2:2009+A1:2015 - Metal Scaffolding. Couplers and Fittings. Couplers and Fittings Outside the Scope of BS EN 74. Requirements and Test Methods.
 - v. BS 1139-1.2:1990 Metal Scaffolding. Tubes. Specification for Aluminium Tube.
- c) The ladders used on / in scaffolding must also comply with relevant BS and industry standards, most notably:
- i. BS EN 131-1:2015 - Ladders. Terms, Types, Functional Sizes.
 - ii. BS EN 131-2:2010+A2:2017 - Ladders. Part 2: Requirements, Testing, Marking.
 - iii. BS EN 131-3:2007 - Ladders. User Instructions.

APPENDIX B

The most common scaffolding types that are non-standard structures and would require bespoke design include, but are not limited to:

- 1. All shoring scaffolds (dead, raking, flying)
- 2. Bridge scaffolds
- 3. Cantilevered scaffolds
- 4. Spectator terraces and seating stands
- 5. Truss-out scaffolds
- 6. Support scaffolds
- 7. Façade retention
- 8. Complex loading bays
- 9. Access scaffolds with more than the 2 working lifts
- 10. Mobile and static towers
- 11. Buttressed free-standing scaffolds
- 12. Free standing scaffolds
- 13. Temporary roofs and temporary buildings
- 14. Temporary ramps and elevated roadways
- 15. Staircases and fire escapes (unless covered by manufacturer's instructions)
- 16. Towers requiring guys or ground anchors

17. Offshore scaffolds
18. Pedestrian footbridges or walkways
19. Slung and suspended scaffolds
20. Protection fans
21. Pavement gantries
22. Marine scaffolds
23. Boiler scaffolds
24. Power line crossings
25. Lifting gantries and towers
26. Steeple scaffolds
27. Radial or splayed scaffolds on contoured facades
28. System scaffolds outside manufacturers guidance
29. Sign board supports
30. Sealing end structures
31. Temporary storage on site
32. Masts, lighting towers and transmission towers
33. Advertising hoardings or banners
34. Rubbish chute
35. Any scaffold structure not mentioned above that falls outside the 'compliant scaffold' criteria in existing industry guidance from system manufacturers or otherwise.

2.16 VIOLENCE AND AGGRESSION POLICY

INTRODUCTION & SCOPE

Capital Maintenance Ltd recognises its duty to provide a safe and secure environment for all employees, contractors/sub-contractors and visitors and we are committed to ensuring a workplace that is free from violence and aggression. We do not tolerate any type of workplace violence committed by or against employees.

Work related violence and aggression can have an impact on both the workers receiving the abuse and those witnessing it in the form of an injury, stress and mental health conditions and disability or death. Capital Maintenance Ltd therefore take any accusation of this nature seriously. Ultimately, we want to reduce as far as possible staff sickness, poor morale and a potential damage to the company's reputation as a result of any violence and aggression at work.

This policy applies to all staff and contractors/sub-contractors employed by Capital Maintenance Ltd and aims to prevent and address incidents of violence and aggression within our organisation by clearly defining expectations and consequences.

DEFINITION

For the purpose of this policy and in line with the HSE guidelines, violence and aggression refers to 'any incident in which a person is abused, threatened or assaulted in circumstances relating to their work'. This can include:

- Verbal abuse or threats including face to face, online and via telephone
- Physical attacks

For violence to be work related, it must be in connection with the work activity.

RESPONSIBILITIES

The Managing Director, Ross Allen, has overall accountability for health and safety within the organisation and he ensures that this policy is implemented through sufficient resources to the team to include training and development of staff where required. The MD appoints the Health and Safety Manager, Jalil

Khasanov, as the responsible person for the day-to-day roll out of this policy.

The Health and Safety Manager, Jalil Khasanov, is responsible for overseeing this policy on a day-to-day basis and he assesses the risks to our workers on a regular basis. He ensures that all staff are aware of the policy through updates at Toolbox talks and H&S meetings and all employees are encouraged to speak freely if they are experiencing or witnessing any workplace abuse. He is also responsible for carrying out an investigation should an allegation be made. The H&S Manager is supported by the Health & Safety Administrator, James Boden.

All employees or contractors/sub-contractors working on behalf of Capital Maintenance Ltd must act in a responsible manner and treat others with dignity and respect whilst at work. All employees are encouraged to report any violent or aggressive behaviour that causes upset and distress. This will be investigated by the H&S Manager and may include offers of support and advice or counselling if required. Our expectations are as follows.

- All employees are expected to treat others with respect, dignity, and professionalism at all times.
- Physical violence, including acts of assault, fighting, or other aggressive behaviours, is strictly prohibited.
- Verbal, written, or electronic threats, harassment, bullying, or intimidation of any kind will not be tolerated.
- Any possession or use of weapons or dangerous objects on company premises, except by authorized personnel as required for their roles, is strictly prohibited.
- Employees are encouraged to report any incidents of violence or aggression they witness or experience.

REPORTING PROCEDURE

Employees should report any incidents of violence or aggression to their immediate Team Manager, our Health and Safety Manager or any designated authority, such as the MD or Contracts Manager, whom an individual feels comfortable with.

We will maintain a confidential reporting process and protect the privacy of individuals involved to the extent permitted by law. This includes promptly investigating all reports of violence and aggression in a fair and impartial manner.

Disciplinary actions, up to and including termination of employment may be taken against individuals found responsible for engaging in violence or aggression, subject to the applicable laws and regulations. Legal authorities may be involved in cases where criminal behaviour is suspected.

Capital Maintenance Ltd will provide support and resources, such as counselling services, to employees who have been affected by incidents of violence or aggression.

COMMUNICATION AND TRAINING

This policy will be communicated to all new starters at Capital Maintenance Ltd and it will be made available to all staff through the shared file system, and they will be required to acknowledge their understanding and compliance.

Regular training and awareness programs will be conducted to educate employees about the policy, prevention strategies, and ways to respond to incidents of violence and aggression.

This policy will be periodically reviewed and updated to ensure its effectiveness and alignment with the organisation's values and legal requirements.

By following this policy, we strive to create a safe and respectful work environment where every individual can thrive and contribute to the success of Capital Maintenance Ltd.

2.17 WORKING AT HEIGHT POLICY

INTRODUCTION

Work at height is defined as work in any place where, if there were no precautions in place, a person could fall a distance liable to cause personal injury. This could be above or below ground.

This Policy document has been written in line with The Work at Height Regulations 2005 and compliance to it is mandatory for all employees, contractors, self-employed persons, and visitors who manage or undertake work at height for and on behalf of Capital Maintenance Ltd.

This policy applies to all employees, contractors, and visitors who may be involved in tasks that require working at height within the premises or during company operations. It is applicable to all working at height activities, including but not limited to working on ladders, scaffolding, roofs, and raised platforms.

This policy aims to establish guidelines and procedures to prevent accidents and injuries related to working at height.

The purpose of this Policy is to ensure that Capital Maintenance Ltd provides a safe working environment for any person who may enter a site/job by carrying out the following steps:

- Ensuring all potential hazards from working at height in the workplace are identified.
- Any risk to a person's health and safety is adequately controlled and reduced to the lowest level reasonably practicable.
- Where necessary the appropriate risk assessments and risk reduction plans are in place and followed.
- Contingency plans and rescue procedures in the event of a fall or emergency must be established and communicated to all individuals involved in working at height activities.
- Supervisors and designated personnel shall oversee working at height operations to ensure compliance with safety protocols and intervene if unsafe practices are observed.
- Clear communication channels must be maintained among all involved parties to promote awareness, cooperation, and adherence to the Working at Height Policy.

DUTIES AND RESPONSIBILITIES

- The Managing Director, Ross Allen, has overall responsibility for ensuring the management of Health and Safety at Capital Maintenance including for ensuring this Policy is implemented.
- The Health and Safety Manager, Jalil Khasanov, has a duty to ensure this Policy allows any persons working on behalf of Capital Maintenance including employees and sub-contractors to comply with their legal responsibilities in a safe manner of working providing training as required. This includes ensuring appropriate Risk Assessments and Method Statements (RAMS) have been undertaken and robustly reviewed. The Health and Safety Assistant, James Boden assists the Health and Safety Manager with this role.
- The Team Managers must ensure that their team have assessed each job and provided suitable Risk Assessments, Method Statements and if applicable, Operating Procedures that are relevant to the task taking into account all job relevant considerations. Assistance, guidance, and training to be provided as required from the Team Managers.
- The employees and sub-contractors have a responsibility to comply with this Policy and any actions arising from its implementation. They must be aware of any hazards from work at height and be able to assess a job/task and complete Risk Assessments and Method Statements which are sent to the Team Managers for approval. Employees are obliged to follow safety guidelines, report hazards, and participate in training programs to enhance their understanding of working at height safety.
- Any incidents, near misses, or hazards related to working at height must be reported promptly and investigated to prevent recurrence and improve safety measures.

PROCEDURE

The overriding principle of working at height is to as far as is reasonably practicable prevent any person falling a distance liable to cause personal injury. It is Capital Maintenance's policy to follow this hierarchy for working at height.

- Avoid the risk by not working at height. Where it is reasonably practicable to carry out the work safely other than at height do so.
- Prevent falls – where work at height cannot be avoided the risks must be assessed and procedures implemented to allow the work to

be done whilst preventing so far as is reasonably practicable people or objects falling. This might include ensuring that the work can be undertaken safely from an existing place of work or choosing the right work equipment to prevent falls e.g., Mobile elevated work platform (MEWP).

- Mitigate the consequences of a fall – where the risks of people or objects falling remains steps must be taken to minimise the distance and consequences of such falls. This will also involve the selection and use of work equipment and preventing people not involved with the work entering the hazardous area.
- Only authorised and adequately trained personnel are permitted to work at height. Training programs on working at height safety must be provided to ensure competency and awareness of best practices.

At all stages a combination of protective measures for example, guard rails, airbags, and nets must be given precedence over personal protective measures such as safety harnesses. Capital Maintenance requires all persons working on their behalf to carry out the following. If these measures cannot be met and adhered to this must be communicated to the Team Managers and the Health and Safety Manager.

- Assess the risk to determine a safe way to work.
- Follow the above hierarchy.
- Plan and organise the work considering such things as emergency measures, possible weather, and environmental conditions.
- Make sure that those working at height are competent to do so, understand the risks and the risk assessments are made aware of and appropriate Permits to Work have been completed as requested by a client.

PLANNING OF WORKS, INSPECTIONS, SUPERVISION

It is the policy of Capital Maintenance to ensure that every work at height task is planned to ensure a safe manner of work as mentioned above. This is to include where possible a site evaluation. If this is not available, persons working on behalf of Capital Maintenance are to include stop checks at each level of their task. Considerations to fragile surfaces, falling objects and danger areas must be recorded.

A rescue plan must be considered and provided. This may be conjunction with the client/Managing Agent and reviewed throughout the entirety of the job. Consideration must be given to lone working, access and egress route to the work area, first aid provision.

Consideration must be given to weather conditions for outdoor work at heights as weather factors could have an adverse effect on the environment surrounding the works and those persons carrying out the task. Persons are to stop work immediately if there is any doubt to adverse weather conditions either at the start or during a job.

The type and use of appropriate work equipment will be chosen once a risk assessment has been completed. This will be documented and reviewed by the Team Manager. Careful considerations will be made as to the selection. Capital Maintenance will only use operatives who are fully trained and certified on equipment such as Scaffolding, MEWPS, personal fall protection/harness equipment, nets/ladder awareness and this will be confirmed by the Health and Safety Manager when risk assessments are submitted.

Any equipment used by Capital Maintenance will have regular and formal inspections to ensure it is safe to use. Certificates will be held by the Team Managers and the Health and Safety Manager.

The Team Managers at Capital Maintenance will provide immediate support and ongoing supervision to the operatives working at height. This includes regular checks that all persons representing Capital Maintenance are competent to carry out the task and their level of responsibility. Works will be stopped, and the risk identified and reassessed if required.

MONITORING

The condition of all equipment such as scaffolding and the work at height carried out by persons on behalf of Capital Maintenance will be monitored. The frequency will be determined and agreed at the risk assessment stage and will be carried out by the Team Manager. This will usually take the form of a visual inspection and documented. Any issues will be escalated to the Health and Safety Manager.

Monitoring and supervision will continue until the job/task is formally signed off and responsibility handed back to the client/Managing Agent.

This Working at Height Policy shall be reviewed periodically to incorporate any

changes in legislation, industry standards, or internal processes. Any updates to the policy will be communicated promptly to all relevant stakeholders.

All employees are expected to familiarise themselves with the contents of this policy and comply with its requirements. Training sessions and informational materials will be provided to facilitate understanding and adherence to the Working at Height Policy.

This policy is effective immediately upon approval and shall serve as a guiding document for all working at height activities within the organisation.

SECTION 3 – LEAVE

3.1 ADOPTION LEAVE

Qualifying employees who have been matched with a child, may take up to 52 weeks adoption leave, and may be entitled to 39 weeks of statutory adoption pay. If a couple jointly adopt a child, one may take adoption leave and the other parent may be able to take paternity leave or shared parental leave.

Adoption Leave may be taken:

- a) When a child starts living with the employee or up to 14 days before the placement date (UK adoptions); or
- b) When an employee has been matched with a child by a UK adoption agency; or
- c) When the child arrives in the UK or within 28 days (overseas adoption).

Employees can take up to 52 weeks adoption leave. This is made up of 26 weeks ordinary adoption leave (“OAL”) followed immediately by 26 weeks additional adoption leave (“AAL”).

You can only take one period of adoption leave even if more than one child is placed with you for adoption at one time.

Employees do not qualify for either Adoption Leave or Pay if they:

- Become a special guardian or kinship carer;
- Adopt a stepchild;
- Adopt a family member or stepchild; or
- Adopt privately, for example without permission from a UK authority or adoption agency.

NOTICE OF INTENTION TO TAKE ADOPTION LEAVE

You are required to notify HR of your intention to take adoption leave no more than seven days after the day you are notified of having been matched with the child or, if this is not possible, as soon as reasonably practicable. You must tell HR in writing:

- that you intend to take adoption leave;

- the date on which the child is expected to be placed for adoption with you; and
- the date you intend to start your adoption leave.

You must also provide HR with the documents that you have been issued with by the adoption agency. The set should include the matching certificate.

Once you have notified HR of the date on which you wish to start your OAL you can change this provided you give the following notice:

- if you want to change your leave so it starts on the date of placement, at least 28 days before the expected date of placement;
- if you want to change your leave so it starts on a predetermined date, at least 28 days before that date.
- If this is not possible, you should tell HR as soon as is reasonable practicable.

The Company will respond in writing within 28 days of receiving your notification and we will confirm your expected date of return to work following your adoption leave.

If the date of placement changes, you should discuss the situation with HR and give the appropriate notice to change the start date. If you plan to start your adoption leave at any time before the actual date of placement, you must be sure that the placement will be going ahead on the date to be agreed before you start your leave. If the placement is delayed for whatever reason and you have already begun your adoption leave, you cannot stop it and start it again at a later date.

If you begin your period of adoption leave before the child is placed with you and you are then told that the placement will not be made or during the adoption leave, the child dies or returns to the adoption agency then your leave will normally finish eight weeks after the end of the week in which the “disruption” took place. If this does occur please remember that you need to give HR eight weeks’ notice of your intention to return to work early (see below).

Note: If you qualify (see below) and wish to claim Statutory Adoption Pay (“SAP”) you must give HR 28 days notice in writing of the date you wish to start receiving SAP. This can be given at the same time as the information above.

RETURN TO WORK AFTER ADOPTION LEAVE

It will be assumed that you are taking both OAL and AAL unless you notify the Company to the contrary.

If you are returning after OAL you are entitled to return to exactly the same job you held before going on adoption leave and on the same terms and conditions which are no less favourable than those which would have applied if you had not been absent.

If you are returning after AAL you are entitled to return to exactly the same job that you held before going on adoption leave or, if this is not reasonably practicable, to a suitable alternative role on terms and conditions which are no less favourable than those which would have applied if you had not been absent.

EARLY RETURN TO WORK

You will be expected to return to work when you have taken your full 52 weeks adoption leave entitlement. The Company will set out the date you are due to return to work in a letter which will be sent to you acknowledging notification of your leave. If you wish, however, to return before this you must give HR not less than eight weeks' notice of the date on which you intend to return to work. If you fail to give eight weeks' notice the Company may postpone your return until eight weeks have elapsed or your adoption leave has expired, whichever is the earlier. The Company may not delay your right to return to work beyond the end of your adoption leave period.

STATUTORY ADOPTION PAY

If you qualify, you will be paid statutory adoption pay ("SAP") for a period of 39 weeks. The first six weeks of SAP will be paid at 90% of average weekly earnings. The remainder will be paid at the lower statutory level, currently £148.68 per week (2019) or 90% of average weekly earnings should this be less than the lower statutory level. In order to qualify for SAP, you must:

- you must have worked continuously for the Company for at least 26 weeks by the week you were matched with a child;
- you must have provided the correct notice; and
- provide proof of the adoption or surrogacy.

SAP will cease to be paid to you should:

- you be taken into legal custody;
- you die;
- the placement of the child be disrupted;
- you start to work for another employer after the child is placed with you but before the end of the SAP period.

Note: Eligible employees who qualify for SAP are entitled to 39 weeks SAP whether or not they intend to return to work following adoption leave.

Entitlement to Other Benefits During Adoption Leave

During OAL, your contract of employment continues. The statutory rules provide that you retain the benefit of all of your contractual rights, including your benefits, other than those relating to remuneration (ie wages or salary).

The position during AAL is slightly different. Your contract is, in effect, suspended, although the statutory rules provide that you retain the benefit of the terms of your contract concerning:

- Notice of termination of employment;
- Compensation in the event of redundancy; and
- Disciplinary and grievance procedures.

Your period of continuous employment with the Company continues while on both OAL and AAL.

Holiday Entitlement

During OAL, your normal holiday entitlement will continue to accrue. During AAL, you will continue to accrue further holiday entitlement, but only to the extent necessary to comply with the Working Time Regulations 1998 (ie four weeks' paid holiday in any year, including bank holidays). Any additional holiday entitlement which the Company ordinarily gives over and above this entitlement does not accrue during AAL.

MAKING CONTACT WITH THE COMPANY DURING ADOPTION LEAVE

You are encouraged to maintain contact with the Company during your adoption leave and either you or the Company may make reasonable contact

with the other during this time, for example, to discuss returning to work. This contact will not affect your adoption leave which will continue as normal.

KEEPING IN TOUCH DAYS

During your adoption leave the Company may ask you to participate in up to ten Keeping in Touch Days.

During a Keeping in Touch Day you may be asked to do the work you would normally be doing under your contract of employment if you were not on adoption leave. You may also be asked to participate in training or any other activities which have the purpose of keeping you in touch with your workplace.

Your adoption leave will not be affected by your participation in a Keeping in Touch Day and it will, therefore, continue as normal.

Keeping in Touch Days will not be added on to the end of your adoption leave in order to extend it. Therefore your adoption leave will come to an end after a maximum 52 weeks as normal.

The Company is under no obligation to offer you a Keeping in Touch Day. However, if it does offer you this opportunity, you do not have to attend if you do not wish to do so.

ENTITLEMENT TO PATERNITY LEAVE (ADOPTION)

Paternity leave for adoptive parents is available to employees, both men and women, who satisfy the following criteria:

- you have, or expect to have, the main responsibility for the child's upbringing;
- you are married to, or are the partner of, the child's adopter. In this context, the partner of the child's adopter is a person (whether of the same or of a different sex) who lives with the adopter and the child in an enduring family relationship but who is not an immediate relative of the adopter; and
- you have at least 26 weeks' continuous employment with the Company ending with the week in which the child's adopter is notified of having been matched with a child.

NOTICE OF INTENTION TO TAKE PATERNITY LEAVE (ADOPTION)

If you wish to exercise your right to paternity leave (adoption) you must give notice in writing of your intention to take leave in respect of a child no more than seven days after the date on which the adopter is notified of having been matched with a child or, if that is not reasonably practicable, as soon as is reasonably practicable. The notice should specify:

- the date on which the adopter was notified of having been matched with a child;
- the date on which the child is expected to be placed with the adopter;
- the length of leave that you wish to take; and
- the date on which you would like your paternity leave to begin.

You may vary the commencement of your paternity leave period provided you give the Company at least 28 days' notice.

DURATION OF PATERNITY LEAVE (ADOPTION)

You may take paternity leave for either one week or two consecutive weeks. You cannot take paternity leave for odd days at a time nor for two separate weeks. You can choose to start your leave:

- from the date of the child's placement;
- from a chosen number of days or weeks after the date of the child's placement; or
- from a chosen date.

Leave can start on any day of the week on or following the child's placement but must be completed within 56 days of the date on which the child was placed with the adopter.

For further details please refer to the separate Paternity Leave Policy.

Failure to comply with any of these requirements may disqualify you from entitlement to paid Adoption Leave.

3.2 APPOINTMENTS AND OTHER LEAVE

JURY LEAVE

A member of staff summoned to jury service must submit a copy of the jury service notice to HR who will discuss this with Management. Time off, with pay (less jurors Court compensation), is granted for jury service. However, if Management feel that such service would seriously affect the work of the office, the Company may ask that you request from the Court a deferral or excusal of jury service. Compensation paid to jurors by the Court must be claimed and notified to HR in order that an equivalent deduction from salary may be made.

MEDICAL AND DENTAL APPOINTMENTS

The Company recognises that employees will sometimes require time off to attend medical and dental appointments and will try to help when considering reasonable requests for time off in special circumstances.

Wherever possible, you should arrange medical and dental appointments outside of working hours or at a time to cause minimum disruption to your work, usually early mornings / late afternoon. In such circumstances, you will be required to make up the time lost and inform HR of when you expect to do so.

Similarly, should you need to attend any hospital appointments, you will be required to notify HR at the earliest opportunity, detailing the total amount of time you will be out of the office and providing a copy of the appointment letter in support of your request. Again, you will be required to make up the time lost.

COMPASSIONATE LEAVE

Employees are granted up to a maximum of 3 days of paid absence when there is a death of an immediate family member.

In this policy ‘immediate family member’ means:

- Spouse, partner, or civil partner.
- Parent, stepparent, or legal guardian.
- Child, stepchild, or dependent.

- Sibling.

Unpaid compassionate leave may be requested if:

- the employee is not eligible for paid compassionate leave, up to a maximum of 3 days,
or
- the employee needs more time, a reasonable number of days will be granted at the discretion of management.

Additional time off to attend funerals under other circumstances may also be granted at the discretion of Management.

3.3 FAMILY LEAVE

The Company recognises that at various stages in employees' working lives, unforeseen domestic and family commitments and responsibilities can reduce or hinder the ability to fulfil work responsibilities. In line with legislation, the Company has introduced a Family Leave Policy.

URGENT FAMILY LEAVE

Employees will be allowed "reasonable" unpaid leave to cope with an unexpected family emergency. What is "reasonable" time off will depend on the circumstances of each case. There is not a set limit to the amount of time off which can be taken. It may range from one or two hours, to a day or more. In most cases, the amount of leave will be one or two days at the most, but this will depend on individual circumstances. The "family" members for whom an employee may need time off are:

- Spouse;
- Child;
- Parent;
- A person who lives in the same household as the employee (other than a lodger/tenant/your employee); and
- Any person who "reasonably" relies on you for assistance when ill, injured or assaulted, or to make arrangements for care in such circumstances.

The circumstances for which leave will be allowed is:

- if a dependent falls ill, is injured or assaulted, or gives birth;
- arrange longer-term care for a dependant who is ill or injured;
- the consequences of the death of a dependent, e.g. dealing with funeral arrangements and to attend a funeral;
- a child is involved in a serious incident at school or during school hours; and
- childcare or other arrangements break down, e.g. if the childminder or nurse does not turn up.

You should notify your immediate Manager and HR of the reason for your absence and how long you expect to be absent, as soon as possible.

In exceptional circumstances, it may not be possible for you to inform anyone at the Company about your absence. If that is the case, as soon as you return

to work you **must** tell your immediate Manager and HR the reason for the absence and why you were unable to make contact before your return.

If you do not comply with the notification requirements, your absence will be regarded as unauthorised. You are reminded that unauthorised absence is a disciplinary offence.

The right to time off is intended to cover **unforeseen** matters only. If you know in advance that you are going to need time off, this must be taken as annual leave in the normal way.

If the time off relates to the care of a child, you should also refer to the Company's policy on parental leave, which may provide a more appropriate way of having time off.

The Company will monitor this policy and its use by employees at all times.

The Company reserves the right to require documentation or other evidence from you to support your request for time off.

The Company also reserves the right to refuse time off if it believes that this policy is being abused.

3.4 ANNUAL LEAVE POLICY

The Company's holiday year is from 1 January to 31 December and your annual entitlement is 20 working days in each holiday year, plus public bank holidays.

Staff who join the Company during the holiday year will accrue 1/12th of the annual holiday entitlement for each complete calendar month of service achieved until the start of the next holiday year. Part-time employees will accrue holiday entitlement on a pro-rata basis.

All holiday entitlement should be taken during the holiday year. Any untaken holidays cannot be carried over to the next holiday year and no payment will be made in respect of untaken holidays (unless they have authorisation from Management).

Holidays should not be more than two consecutive weeks at any one time, however this will be at the discretion of Management. Staff are permitted to take half day holidays.

Staff are asked to report directly to HR (via email) with any holiday requests. At least two weeks notice is to be given in respect of holidays lasting one week or more, and at least one weeks' notice for any holidays less than one week. The Company acknowledges the fact that this is not always a possibility and will be flexible wherever possible.

We require sufficient cover within each department. Therefore, please liaise with your team members before requesting holiday.

Once you have notified HR of your proposed holiday dates, they will confirm via email whether or not your chosen dates have been approved.

When members of staff leave the Company, payment will normally be made for all unused accrued holiday entitlement. If more holiday has been taken than has been accrued, that will be deducted from any outstanding salary. Where termination is due to gross misconduct, payment will be only made for unused accrued holiday entitlement pursuant to the statutory minimum holiday entitlement.

3.5 MATERNITY LEAVE

Irrespective of your length of service with the Company and the number of hours you work, you will be entitled to a total of 52 weeks' statutory maternity leave, as long as you comply with all the relevant conditions. You are also entitled to time off from work to attend antenatal classes.

During absence on maternity leave you will no longer receive your salary, but as long as you meet the necessary criteria you will be eligible for statutory payments as a minimum. You will also continue to be entitled to all other contractual benefits of your employment.

It is important that you follow certain procedures when taking maternity leave and you should refer to HR who can provide you with further information at the time.

We have provided some pointers on general guidance, as follows:

LEAVE

- There is a compulsory leave period of two weeks immediately after giving birth;
- The length of ordinary maternity leave ("OML") is 26 weeks, this includes the compulsory two week period; and
- You are entitled to take 26 weeks of additional maternity leave ("AML").

START OF MATERNITY LEAVE

Maternity leave should normally not commence earlier than the beginning of the 11th weeks before the expected week of childbirth ("EWC"). The requirements for notification of leave dates are set out below. You can choose to take less than your statutory entitlement of leave but you must, by law, take at least two weeks leave after the birth of your baby.

If your baby is born early, the maternity leave period and maternity pay will automatically begin on that date. In such circumstances you should inform HR as soon as possible after the birth.

Maternity leave may also be triggered if you are absent due to a pregnancy related illness during the four weeks immediately before the EWC, regardless of the notified start date for leave.

NOTIFICATION REQUIREMENTS

You are not obliged to notify your pregnancy until the end of the 15th week before the EWC, unless this is not reasonably practicable.

By the end of the 15th week before the EWC you must notify HR.

- that you are pregnant;
- the week your baby is expected to be born; and
- when you want your maternity leave to start and end.

You must also provide the Company with a formal certificate (known as Form Mat B1) confirming the expected week of childbirth from your doctor or midwife.

Within 28 days, the Company will write to you setting out the date on which your full entitlement to maternity leave will expire.

You can change your mind about when you want your maternity leave to start provided the Company is given at least 28 days notice in advance, or if this is not possible, as much notice as possible.

If you intend to take your full maternity leave entitlement you will not need to do anything further before returning to work. If you want to return before the end of your maternity leave entitlement you must give at least 8 weeks' notice in writing of the date when you want to return. We encourage employees to keep their immediate Managers or HR informed of their intentions as this will help the Company to plan cover arrangements.

If you fail to give 8 weeks' notice, the Company may postpone your return until 8 weeks have elapsed or your maternity leave has expired, whichever is the earlier. The Company may not delay your right to return to work beyond the end of your maternity leave period.

RIGHT TO RETURN TO WORK

Following your return from OML, you have a legal right to return to the same job and on the same terms and conditions as if you had not been absent from work.

If you take AML you are entitled to return to the job in which you were employed before your absence or, if this is not reasonably practicable, to another job which is suitable and appropriate.

Whether you return to the same job, or a suitable and appropriate job, your terms and conditions of employment, including those relating to remuneration, will be no less favourable than would have applied to you if you had not been absent on maternity leave.

TIME OFF FOR ANTE-NATAL CARE

You are entitled to reasonable paid time off work in order to attend ante-natal appointments which may include relaxation classes or similar classes which have been arranged or recommended by a midwife, doctor or other health professional.

HR may ask you to produce written proof of the appointment and a certificate or note from a registered medical practitioner or midwife confirming that you are pregnant.

You should notify your immediate Manager and HR in advance of the time of all such appointments. Wherever possible, ante-natal appointments should be arranged outside normal working hours. The Company recognises, however, that this is not always possible. If, therefore, there is no alternative but to attend appointments or classes during working hours, please try to arrange them as near to the start or the end of the day, or in some other way which will minimise disruption to your work.

RISK ASSESSMENTS

The Company carries out risk assessments of the working environments of all pregnant employees and new and breast feeding mothers to ensure the health and safety of the mother and child.

If the working environment poses a threat to you or your child, your duties will be modified or suitable alternative work will be found.

In exceptional circumstances if suitable modified duties cannot be identified you will be suspended from work on full pay on medical grounds.

PAY

- Statutory Maternity Pay (“SMP”) is payable for 39 weeks
- The first six weeks of SMP will be paid at 90% of average weekly earnings; and
- The remainder being paid at the lower statutory level, currently £148.68 per week (2019) or 90% of average weekly earnings should this be less than the lower statutory level.

To qualify for the above leave and pay you must:

- Have average weekly earnings in the eight weeks up to and including the qualifying week at or above the lower earnings limit for the payment of National Insurance contributions;
- Have 26 weeks’ continuous service with the Firm assessed at the 15th week before the week the baby is due.
- Still be employed by the Company in the 15th week before the EWC.

OBLIGATIONS AND RIGHTS DURING MATERNITY LEAVE

Your contract of employment continues during OML. This means that you continue to be bound by the terms of your contract. This includes, for example, your duties relating to disclosure of confidential information, working for other businesses, ownership of inventions and other intellectual property, your obligation to give notice of termination of employment as provided in your contract, and so on.

The position during AML is slightly different. Your contract is, in effect, suspended, although the statutory rules provide that you will remain bound by the terms of your contract concerning:

- your duty to act in good faith towards the Company (including the obligation not to hold any other employment or be interested in any other business during your employment),
- your duties of confidentiality; and
- your obligations to give notice to the Company to terminate your employment.

During OML, your contract of employment continues. The statutory rules provide that you retain the benefit of all of your contractual rights, including your benefits, other than those relating to remuneration (i.e. wages or salary).

The position during AML is slightly different. Your contract is, in effect, suspended, although the statutory rules provide that you retain the benefit of the terms of your contract concerning:

- Notice of termination of employment;
- Compensation in the event of redundancy;
- Disciplinary and grievance procedures.

Your period of continuous employment with the Company continues while on both OML and AML.

During OML, your normal holiday entitlement will continue to accrue. During AML, you will continue to accrue further holiday entitlement.

CONTACT AND KEEPING IN TOUCH DAYS

You are encouraged to maintain contact with the Company during your maternity leave and either you or the Company may make reasonable contact with the other during this time, for example, to discuss returning to work. This contact will not affect your maternity leave which will continue as normal.

During your maternity leave the Company may ask you to participate in up to ten Keeping in Touch Days.

During a Keeping in Touch Day you may be asked to do the work you would normally be doing under your contract of employment if you were not on maternity leave. You may also be asked to participate in training or any other activities which have the purpose of keeping you in touch with your workplace.

Your maternity leave will not be affected by your participation in a Keeping in Touch Day and it will, therefore, continue as normal.

Keeping in Touch Days will not be added on to the end of your maternity leave in order to extend it. Therefore your maternity leave will come to an end after a maximum 52 weeks as normal.

The Company is under no obligation to offer you a Keeping in Touch Day. However, if it does offer you this opportunity, you do not have to attend if you do not wish to do so.

You will not be asked to participate in a Keeping in Touch Day at any time in the two weeks immediately following the birth of your child.

3.6 PARENTAL LEAVE POLICY

INTRODUCTION

This document sets out the Company's parental leave policy. Under UK employment laws, all employees who satisfy certain conditions are entitled to the following:

- time off to care for your child/adopted child; and
- a right to return to work after parental leave.

The right is an individual right, so both parents are entitled to parental leave.

ELIGIBILITY

Provided an individual has at least one year's continuous service with the Company, you are entitled to take parental leave if you fall into one of the following categories:

- you are the parent (named on the birth certificate) of a child born after 5 December 1999; or
- you have acquired parental responsibility for a child (under the Children Act 1989 or the Children (Scotland) Act 1995) born after 15 December 1999 who is under five years old; or
- you have adopted a child under age 18 after 15 December 1999; or
- you are the parent of a disabled child under age 18 (ie the child is entitled to disability living allowance).

TIME OFF TO CARE FOR YOUR CHILD/ADOPTED CHILD

If you fall within the eligibility criteria above, you will be entitled to a maximum of 18 weeks unpaid leave per child for the purposes of caring for that child.

LIMITATIONS ON THE RIGHT TO LEAVE

The leave must be taken in blocks of one week or more. If you choose to take part of a week as parental leave, this will count as a whole week and be deducted from the 13-week total. If you are the parent of a disabled child, however, you are permitted to take the leave a day at a time.

In addition, only a maximum of four weeks' parental leave can be taken in any one year. A year, for this purpose, is a calendar year running from the date on which you first became entitled to take parental leave (e.g. the date of birth, the date of adoption, the date of completion of one year's service etc).

NOTICE REQUIREMENTS

You must give HR a minimum of 21 days' written notice of your intention to take Parental Leave. The notice must state the date on which you wish your period of leave to commence and the date on which you propose to return to work.

Special rules apply if you are a father following the birth or adoption of a child (see section 0 below).

In addition, if the period of proposed Parental Leave is less than two weeks, the period of notice required to be given to the Company is reduced to a period of twice the amount of proposed leave.

POSTPONEMENT OF PARENTAL LEAVE

The Company has the right to postpone your leave for up to six months, depending on the needs of the business. The Company will, however, confirm the date on which your leave may be taken.

Special rules apply if you are a father following the birth or adoption of a child (see section 0 below).

For part-time employees, parental leave will be calculated on a pro rata basis.

SPECIAL RULED FOR FATHER AFTER THE BIRTH OR ADOPTION OF A CHILD

It is acknowledged that a father may wish to take parental leave immediately following the birth or adoption of his child. In these circumstances, it would be undesirable for the father if the parental leave was postponed by the Company.

As a result, there are special rules governing a father wishing to take parental leave following the birth of his baby or the start of an adoption placement. These are that:

- if the father gives the Company at least three months' written notice before the expected week of childbirth (or date of adoption); and
- then the Company guarantees that the leave will not be postponed.

If the three-month notice is not given, the normal rules about parental leave still apply. However, the Company cannot then guarantee that parental leave can be taken on the proposed date.

YOUR OBLIGATIONS DURING PARENTAL LEAVE

You will remain employed by the Company during any period of leave and continue to be bound by the terms of your contract concerning:

- your duty to act in good faith towards the Company (including the obligation not to hold any other employment or be interested in any other business during your employment);
- your duties of confidentiality; and
- your obligations to give notice to the Company to terminate your employment.

YOUR RIGHTS DURING PARENTAL LEAVE

Your contract of employment

You will remain employed by the company during any period of leave and remain entitled to benefit from your contractual terms and conditions relating to:

- notice of termination of employment;
- compensation in the event of redundancy; and
- disciplinary and grievance procedures.

Pay

Parental leave is **unpaid**.

Other contractual benefits

In addition, the Company is under no obligation to continue to provide other contractual benefits to you during your period of leave. The Company reserves the right to request the return of your mobile telephone, company car etc during any period of leave.

Continuous employment

Your period of continuous employment with the Company continues while on parental leave.

Holiday entitlement

You will continue to accrue rights to holiday during parental leave, but only to the extent necessary to comply with the Working Time Regulations 1998 (ie four weeks' paid holiday in any year, including bank holidays). Any additional holiday entitlement which the Company ordinarily gives over and above this entitlement does not accrue during parental leave.

YOUR RIGHTS RETURNING FROM LEAVE

Where the period of leave taken is four weeks or less, you are entitled to return to the same job you held before commencing leave.

If, for any reason, you are granted a longer period of leave, you will have the right to return to the same job as before or, where that is not practicable, a similar job which has the same or better status, terms and conditions as your old job.

GENERAL

The Company may ask you to give a brief explanation of your responsibility for the child and may ask for proof of your responsibility (e.g. child's birth or adoption certificate, proof of child's entitlement to disability living allowance).

For new employees joining the Company, the Company reserves the right to request from previous employers' confirmation of parental leave already taken and to deduct that leave from any remaining entitlement once the qualifying period has been achieved.

The policy will be regularly reviewed by the Company and may be ended or amended at any time. The Company may omit any element of this policy where it considers it appropriate.

3.7 PATERNITY LEAVE POLICY

Male employees will be entitled to a maximum of 2 weeks paid paternity leave. These rights are applicable to employees following the birth of a child or placement for adoption. You must:

- a) Be the biological father of the child or be married to or the partner of the mother (or adopter) in an enduring family relationship.
- b) Have, or expect to have, responsibility for your baby's upbringing.
- c) Have at least 26 weeks' continuous service by the 15th week before the Expected Week of Confinement (EWC). (If born prematurely the entitlement still applies).
- d) Provide a self-certificate stating when the baby is due and when you wish to take paternity leave. Applications must be made in writing to HR.
- e) Take the paternity leave in a single block of one or two weeks of your choice (unless otherwise agreed) during a period of 56 days beginning on the date the child is born or placed for adoption. If the child is born early, the paternity leave must be taken within the period from the actual date of birth, up to 56 days after the first day of the week in which the birth was expected. You can also take an additional 4 weeks unpaid leave.

Written notification of your intention to take paternity leave MUST be given at least 15 weeks before the EWC or date the child will be placed for adoption, or if this is not possible, as soon as is practicable. You can change your mind about the date you want to start paternity leave provided you give at least 28 days' notice before the paternity leave is due to start.

Fathers who have at least 26 weeks continuous employment at the 15th week before the baby is due, are entitled to 2 weeks leave with all the contractual benefits normally enjoyed, with the exception of remuneration. You have the right to return to work at the end of the 2 week period under the same terms and conditions as if you had not been absent. Statutory Paternity Pay is currently £148.68 (2019 figure, revised annual each April).

If you are on certified sick leave during your Statutory Paternity Leave period you must notify the Company immediately. Failure to comply with any of these requirements may disqualify you from entitlement to paid Paternity Leave.

LEAVE FOR ANTENATAL APPOINTMENTS

Fathers, partners and civil partners of a pregnant woman are entitled to unpaid time off during working hours to accompany her to 2 ante-natal appointments. This includes intended parents if they're having a baby through a surrogacy arrangement.

The Company may, at its discretion, provide full pay for these appointments upon receipt of relevant supporting documentation and providing that the employee loses no more than a half day working time. Please liaise with HR should you wish to attend any such appointment.

3.8 SICK LEAVE

The purpose of this policy is to set out what treatment you can expect from the Company if you are absent from work because of sickness or injury.

The overriding aim of this policy is to ensure a healthy, productive workforce, not to punish you for being unwell. The Company recognises that whilst we want all of our colleagues to be healthy and attend their place of work regularly as planned, there will be times when individuals may be unable to do so because of ill health. We understand that some sickness absence is inevitable and managing sickness is not concerned with pressurising unfit employees to return to work. It is concerned with creating the culture where being at work is the norm and short-term and long-term sickness is managed effectively with appropriate support to encourage high standards of attendance.

However, the Company cannot ignore the effects of sickness absence on the business and other members of staff and for that reason, frequent short term and long-term sickness absences will be managed.

The Company have therefore devised the following policy to ensure that occasions of sickness absence are dealt with in a fair, consistent and sympathetic manner whilst minimising disruption in the workplace. This policy identifies points at which the Company will take action if your sickness absence reaches unacceptable levels.

If you are absent from work as a result of sickness or injury, you must notify the Company by telephone before your usual start time on the first day of absence, and each and every day of your absence. If you are unable to telephone yourself, you should arrange for someone to do so on your behalf. The fact that you have notified the Company does not mean that you have been given permission to be absent.

Should notification of your absence not be received within one hour of your normal start time, your Superior will attempt to contact you.

If the period of absence is eight or more consecutive calendar days, you must without delay submit to the Company a medical certificate. This should be signed by a practising medical practitioner, in respect of each week of absence after the first.

RETURN TO WORK INTERVIEWS

When you return to work from any sickness related absence (excluding holidays / attending business matters) either your manager or the People & Practices Manager will interview you on the first day of your return or as soon as reasonably practicable after that.

They will check that you are fit to return, update you on any important matters you have missed and may discuss your absence record if appropriate.

The purpose of the interview is to highlight any underlying problems in relation to your absences.

ATTENDANCE MANAGEMENT POLICY PRINCIPLES

The attendance management policy is guidance only and does not form part of the contract of employment. The Company reserves the right to amend the policy from time to time.

Matters relating to an individual's health will be treated confidentially and only disclosed internally (e.g. HR or Management) or externally (e.g. medical advisers) to the extent appropriate for the effective management of the situation and to enable the Company to make informed decisions.

Throughout the attendance management policy, the Company may seek information from the individual, occupational health advisers, specialists appointed by the Company or the individual's doctors as appropriate, relating to:

- their fitness for work either in their role or alternative duties;
- any causes for their absence;
- the impact of any medical impairment on their ability to fulfil their role or alternative work and give full, regular, sustained attendance in their role or other roles;
- their prognosis with regard to attendance and fitness to perform their role or alternative duties including the impact of any treatment and the timescales involved; and
- any adjustments that could be made to their role or alternative duties to enable the individual to resume work or improve their attendance.

The Company wants to deal appropriately and fairly with any absence

problems that you may have. To help the Company do so, it is important that we have the necessary medical opinion and advice so that the Company can make informed decisions. As a result, the Company reserves the right to ask you at any stage of absence to provide access to your medical records to a doctor of the Company's choosing and/or to undergo a medical examination with a doctor of the Company's choosing. In such cases, the Company will pay for the examination and for any expenses that you incur.

In this situation, the Company will ask you to sign a request for medical information form providing the Company with authority to contact your doctor to investigate absence on account of sickness or injury. If the Company requires a report from your GP, we will comply with the Access to Medical Reports Act 1988, which requires that:

- the Company obtains your written consent before we contact your GP;
- you are given prior access to the report and can refuse the Company access to it if you wish; and
- you can ask your GP to alter the contents of the report if you feel it is inaccurate. If your GP does not wish changes to be made, you can ask your GP to attach a statement of your views to the report.

However, you should be aware that if you refuse to supply the relevant medical information, the Company may have no choice but to make decisions about your likely return to work based on the information that is available. Therefore, it is in your best interests to disclose medical information.

All employees are expected to co-operate in this regard and that will include attending medical appointments made for them and giving consent for the release of relevant medical records for the preparation of reports and also attend any meetings convened by the Company in order to discuss the above points. If individuals do not co-operate this will mean that the Company are less likely to be able to provide support and it may place their sick pay or their continued employment at risk.

All employees are expected to disclose any underlying medical impairment which is expected or likely to impact on their ability to fulfil all aspects of their role or cause significant absence or give rise to significant requirements for time off. The Company will treat such disclosures sensitively and they will only be disclosed in confidence to those that need to be aware in order to ensure effective management, appropriate support and informed decision making. The Company aims to ensure that reasonable adjustments are made as appropriate for individual's particular needs where they have a disability

under the Disability Discrimination Act 1995.

Where it is agreed that an individual has a disability in accordance with the Disability Discrimination Act 1995, absence which is disability-related will still be recorded and monitored under this policy and the programmes will still apply. However, reasonable adjustments will be considered in each case according to the particular circumstances, to include, if appropriate, discounting the periods of absence related to that disability and reducing an individual's Bradford Factor points total accordingly.

Individuals with a disability who require assistance during the procedure should contact HR.

If the company has reason to believe that you have taken or are taking sickness absence when you are not unwell, we may invoke our disciplinary procedure. We may also treat other actions and failures under this policy as misconduct for the purposes of the disciplinary procedure, such as a failure to maintain regular contact and/or notify us of your absence and/or supply fit notes/medical certificates as stipulated.

TRIGGER LEVELS FOR FORMAL ACTION

The company has set 'trigger levels' to help identify unsustainable patterns of absence. 'Trigger levels' are not an entitlement to sickness absence and you may be called to account for any level of absence. The company reserves the right to amend the trigger levels at any time.

The first 'trigger level' is:

- 8 working days of continuous sickness absence;
- Or
- 3 or more occasions of absence during a rolling period of 12 consecutive months;
- Or
- a pattern of absence otherwise considered unacceptable by the company, e.g. a pattern of absences on Mondays and/or Fridays.

If your attendance record reaches the first trigger level, you will be invited to a review meeting to discuss your attendance and the reasons for it. If appropriate in the circumstances, you will be given a written warning. If your attendance record can be improved and maintained at an acceptable level, the written warning will lapse after 6 months from the date it is issued.

The second ‘trigger Level’ is:

If during the period of your first written warning, your attendance does not improve and you:

- are absent again for 5 or more consecutive days of sickness absence;
- Or
- are absent again on 2 or more occasions of sickness absence in the following 6-month period;
- Or
- have a pattern of absence otherwise considered unacceptable by the company.

If your attendance record reaches the second trigger level, you will be invited to another review meeting to discuss your attendance record levels and the reasons for it. If appropriate in the circumstances, you will be given a second written warning. If your attendance record can be improved and maintained at an acceptable level, the written warning will lapse after 6 months from the date it is issued.

The third ‘trigger level’ is:

If during the period of your second written warning, your attendance does not improve and you:

- are absent again for 5 or more consecutive days of sickness absence;
- Or
- are absent again on 2 or more occasions of sickness absence in the following 6-month period;
- Or
- have a pattern of absence otherwise considered unacceptable by the company.

If your attendance record reaches the third trigger level, you will be invited to another review meeting to discuss your attendance record levels and the reasons for it. If appropriate in the circumstances, you will be given a final written warning. You will be informed that, unless your attendance record can be improved and maintained at an acceptable level, dismissal may follow. If there is substantial and lasting improvement, the final written warning will lapse after 12 months from the date it is issued.

The fourth ‘trigger level’ is:

If during the period of your final written warning:

- you are absent again for 5 or more days of sickness absence;
- Or
- you are absent again on 2 or more occasions of sickness absence;
- Or
- your pattern of absence is otherwise considered unacceptable by the company.

We will write to you asking you to attend a further review meeting. You should be aware that, if you reach this stage, you may be dismissed (with notice).

Appeal

You have the right to appeal against the written warning or dismissal. An appeal must be in writing within 7 days of the date of receipt of the letter confirming the outcome of the Formal Review Meeting to People and Practices stating the reasons for the appeal.

LONG TERM ABSCENCE PROCEDURE

The Company understand that the serious nature of some colleagues' illnesses may mean that they are off for longer periods of time. We appreciate that handling sickness absence in such circumstances is a very sensitive area of management, where employees may be feeling particularly vulnerable. We therefore wish to establish a clear framework on how to approach long term sickness absence in a sympathetic, fair and consistent way. The aim of the long-term absence management procedure is to facilitate an early and sustained return to work with regular attendance.

We have therefore established the following general principles which will apply when dealing with all long-term absence cases:

- in all cases, the nature and length of the illness or disability will be considered;
- we aim to consider all the circumstances surrounding an individual's absence from work in making any decisions;
- if, following consultation with the GP, Specialist or Occupational Health Advisor, no indication can be given as to a likely date of return, then a review date will be set after which termination of employment may have to be considered. A time scale for review of an individual's situation will be set by the Company after discussion with them at each formal stage of

- the programme. The timescale may take into account any review date set by occupational health and will be based on individual circumstances;
- following each formal meeting under the programme (detailed below), a formal advice note will be issued which will confirm the discussion and outcome and any actions including timescales. The formal advice note will set out the date for review of an individual's situation. A copy of the formal advice note will be kept on their personnel file. The formal advice note will remain current for the duration of their absence and until they have returned to their full role or a permanent alternative role on a sustained basis for a period of six months in the case of a stage 1 advice note and a period of 12 months in the case of a stage 2 or 3 advice note;
 - where an individual refuses to co-operate in providing medical evidence or in undergoing an independent medical examination, they will be informed that a decision will be taken on the basis of information available to the Company at the time;
 - the Company will make every effort to explore the suitability of alternative positions and of any reasonable adjustments that could be made, if applicable. Reasonable adjustments may include, if applicable, discounting periods of absence relating to a disability as defined under the Disability Discrimination Act 1995 or making other adjustments which facilitate the individual's return to work and continuing employment. The Company will not create a special job for an individual where none exists; and
 - if termination of employment is decided upon, the individual will have the right of appeal. There is also the right of appeal against the decision to move individuals to the next stage of the review procedure. An appeal must be in writing and received within 7 days of receipt of the letter confirming that the individual is to be moved to the next stage of the review procedure. The appeal will be heard by either a Senior Manager or Management.

First Formal Review Meeting

A meeting will be held between the individual's immediate Manager and HR. They may be accompanied by a colleague of their choice. At the first review meeting, the following options will then be considered:

- a date for their return to work;
- arrangements for a medical report from the GP or Occupational Health Advisor;
- a rehabilitation period in the individual's existing job (for instance with light duties or reduced hours) or any possible reasonable adjustments;

and

A stage 1 formal advice note will be issued to the individual following the meeting. If, by the review date set out in stage 1 formal advice note, they remain unable to return to work or give sustained regular attendance in their role or if further information obtained during the review period indicates that they are unlikely to be able to return to work or give regular sustained attendance by the review date, they will be invited to attend a stage 2 review meeting. They will also be invited to a stage 2 review meeting if they have returned to work but have not been able to sustain that return for the duration of the stage 1 formal advice note.

Once the investigations agreed at the first meeting have been completed, a second formal meeting will be arranged.

Second Formal Review Meeting

This meeting will be conducted by the individual's immediate Manager and HR. The individual may be accompanied by a colleague of their choice.

A decision will then be made on the future, taking into account the following options:

- return to work either in the original position or an alternative with rehabilitation and/or reasonable adjustments if appropriate. In either case, every effort will be made to accommodate the needs of the individual through the adaptation or modification of the role, and reduction or alteration of the working hours. After an individual has returned to work after long term absence, the Short Term Attendance Review Procedure will be applied;
- termination of employment on medical grounds with appropriate notice; and
- the postponement of a decision pending further medical information.

If the Company concludes, after discussion with the individual, that it is clear that they will not be able to return to their role or sustain regular attendance within a reasonable period of time the Company may move to stage 4 immediately after the stage 2 review meeting after consideration of the redeployment policy.

If the Company concludes, after discussion with the individual, that there is a prospect of a sustained return to work within a reasonable period or if the prognosis for return is not known (other than as a result of the individual's

unwillingness to provide information) a further timescale for review will be set by the Company.

A stage 2 formal advice note will be issued to the individual following the review meeting. The formal advice note will set out the date for review of their situation and, depending on the outcome, move to stage 4 of the programme.

If, by the review date set out in the stage 2 formal advice note, the individual remains unable to return to work or give sustained regular attendance in their role or if further information obtained during the review period indicates that they are unlikely to be able to return to work or give regular sustained attendance by the review date, they will be invited to attend a stage 3 review meeting. They will also be invited to a stage 3 review meeting if they have returned to work but have not been able to sustain that return for the duration of the stage 2 formal advice note.

Third Formal Review Meeting

This meeting will be conducted by the individuals immediate Manager and HR. The individual may be accompanied by a colleague of their choice.

If the Company concludes, after discussion with the individual, that it is clear that they will not be able to return to their role or sustain regular attendance within a reasonable period of time the Company may move to stage 4 immediately after the stage 3 review meeting after consideration of the redeployment policy.

If the Company concludes, after discussion with the individual, that there is a prospect of a sustained return to work within a reasonable period or if the prognosis for return is not known (other than as a result of the individual's unwillingness to provide information) a further timescale for review will be set by the Company.

A stage 3 formal advice note will be issued to the individual following the review meeting. The formal advice note will set out the date for review of their situation and, depending on the outcome, move to stage 4 of the programme.

Stage Four - Dismissal

This meeting will be conducted by a Senior Manager and HR. The individual may be accompanied by a colleague of their choice.

An individual will be invited to attend a stage four meeting if:

- after the stage 2 or stage 3 review meetings the Company has concluded that they will be unable to return to their role or give sustained and regular attendance in their role;
- after the further period for review set out in the stage 3 formal advice note they remain unable to return to work or give sustained regular attendance in their role or if further information obtained indicates that they are unlikely to be able to return to work or give regular sustained attendance by the review date; or
- they have returned to work but have not been able to sustain that return with regular attendance for the duration of the stage 3 formal advice note.

The matter will be discussed fully before a final decision is made. The individual will be advised that the termination of their employment will be considered at the meeting. The Company will discuss the situation with them and consider all the information available including occupational health advice or other medical advice and the steps taken to facilitate their return to work or sustain a return to work with regular attendance. Where there is a conflict of medical advice the Company may decide which advice to prefer subject to having reasonable grounds for its decision.

Where the Company concludes that there is no clear likelihood of the individual's return to work within a timeframe that is reasonable in the view of the Company in the circumstances this will normally result in the termination of that individual's employment. The reason for the termination of their employment will be due to their capability as a result of ill health or because the Company cannot reasonably sustain the level of absence.

If the decision is taken to terminate their employment they will be provided with a letter setting out the reason for the termination of employment, the date on which their employment is terminated and their right of appeal.

The Company may alternatively allow a further period of time for review under stage 3 or agree action under the redeployment policy.

If an individual does not attend a meeting or give notice that they or their chosen representative are unable to attend the initial meeting, the Company will postpone the meeting for up to a further five working days. If that individual does not attend the second meeting without good reason the meeting may take place in their absence and the Company may come to a

decision based upon the information available. If an individual is unable to attend a second meeting for a good reason but is likely to remain unable to attend a meeting within a reasonable timescale in the circumstances then the Company may invite their comments in writing and come to a decision in their absence based on the information available.

Additional Formal Review Meetings

Additional review meetings may be scheduled where further information is required prior to making a decision. These meetings will follow the format and content set out in the Second Formal Review Meeting.

Appeal

If at the end of the process, an individual is dismissed on medical grounds, they have the right of appeal against the dismissal. An appeal must be in writing within 7 days of the date of receipt of the letter confirming the outcome of the Formal Review Meeting to HR stating the reasons for the appeal.

Definition of Long Term Absence

The Company have defined long term absence as a single occasion lasting for a period of four calendar weeks or longer. Although it is appropriate that there is a different procedure for long-term sickness, the central contractual requirement remains that an individual is required to attend work on a regular and consistent basis.

Contact

In all cases of absence, an employee is obliged to keep the Company informed of their progress. Contact will also be maintained by the Company to ensure that there is mutual understanding of the situation.

The Company will aim to make contact with the colleague after absences of four calendar weeks. This will be done via telephone. Where an individual returns to work following long term sick leave or an operation, we will consider referring them to their GP or our Occupational Health Advisor for a medical assessment.

SICK PAY

Full sick pay will operate under a strict discretionary policy. Following your return to work interview, your sickness record will be reviewed by Management, whereupon payment of that particular absence will be decided. However, as a minimum, you will be entitled to Statutory Sick Pay (“SSP”). The main features of this scheme are as follows:

- the first three days of incapacity are unpaid (called “waiting days”);
- further sickness absence is paid in accordance with the Statutory Sick Pay (SSP) rate set by the UK government, for up to 28 weeks.
- once SSP is exhausted, an employee normally transfers onto benefits, paid directly by the Department of Work and Pensions; and
- if two periods of sickness are separated by less than eight weeks (56 days), then they are linked, and the employee need not serve waiting days again.

3.9 CARER'S LEAVE POLICY

INTRODUCTION

This document sets out the Company's Carer's Leave policy. Under UK employment laws, all employees who satisfy certain conditions are entitled to the following:

- time off to give or arrange care for a 'dependant'
- a right to return to work after Carer's Leave.

ELIGIBILITY

All employees are entitled to take Carer's Leave from the first day of their employment, if they fall into one of the following categories:

- you are a carer for a dependant that relies on you for care;

your dependant has:

- a physical or mental illness or injury that means they're expected to need care for more than 3 months;
- a disability (as defined in the Equality Act 2010);
- care needs because of their old age;

TIME OFF TO GIVE OR ARRANGE CARE FOR YOUR DEPENDANT

If you fall within the eligibility criteria above, you will be entitled to a maximum of one weeks unpaid leave every 12-month period for the purposes of arranging care or caring for that dependant. You can use this week of leave on more than one dependant. A 'week' means the length of time you usually work over 7 days.

LIMITATIONS ON THE RIGHT TO LEAVE

The leave can be taken as a whole week block or can be take as individual or half days throughout the year.

NOTICE REQUIREMENTS

If the request is for half a day or one full day, you must give HR a minimum of 3 days' notice whether verbal or written of your intention to take Carer's Leave. The notice must state the date on which you wish your period of leave to commence and the date on which you propose to return to work.

You must give HR a minimum of twice the amount of days' requested for Carer's Leave as notice, whether verbal or written of your intention to take Carer's Leave, for example, if the request is for 2 days, the notice period must be at least 4 days. The notice period needs to be in full days, even if the request includes half day amounts.

If you need to look after someone in an emergency, you can take time off for this without giving notice.

POSTPONEMENT OF CARER'S EAVE

The Company has the right to postpone your leave for a maximum of one month if your absence is considered to cause serious disruption to the business. The Company will, however, confirm the date on which your leave may be taken. The Company will provide written confirmation of the reason due to which your Carer's Leave will be delayed, within 7 days of your original request date and before the requested start date of the leave.

YOUR OBLIGATIONS DURING CARER'S LEAVE

You will remain employed by the Company during any period of leave and continue to be bound by the terms of your contract concerning:

- your duty to act in good faith towards the Company (including the obligation not to hold any other employment or be interested in any other business during your employment);
- your duties of confidentiality; and
- your obligations to give notice to the Company to terminate your employment.

YOUR RIGHTS DURING CARER'S LEAVE

Your contract of employment

You will remain employed by the company during any period of leave and remain entitled to benefit from your contractual terms and conditions relating to:

- notice of termination of employment;
- compensation in the event of redundancy; and
- disciplinary and grievance procedures.

Pay

Carer's Leave is **unpaid**.

Other contractual benefits

In addition, the Company is under no obligation to continue to provide other contractual benefits to you during your period of leave. The Company reserves the right to request the return of your mobile telephone, company car etc during any period of leave.

Continuous employment

Your period of continuous employment with the Company continues while on Carer's Leave.

Holiday entitlement

You will continue to accrue rights to holiday during Carer's Leave, but only to the extent necessary to comply with the Working Time Regulations 1998 (ie four weeks' paid holiday in any year, including bank holidays). Any additional holiday entitlement which the Company ordinarily gives over and above this entitlement does not accrue during Carer's Leave.

Your rights on returning from leave

Following Carer's leave you are entitled to return to the same job you held before commencing leave.

If, for any reason, you are granted a longer period of leave, you will have the right to return to the same job as before or, where that is not practicable, a similar job which has the same or better status, terms and conditions as your old job.

General

For new employees joining the Company, the Company reserves the right to request from previous employers' confirmation of Carer's Leave already taken and to deduct that leave from any remaining entitlement once the qualifying period has been achieved.

The policy will be regularly reviewed by the Company and may be ended or amended at any time. The Company may omit any element of this policy where it considers it appropriate.

3.10 NEONATAL CARE LEAVE POLICY

1. INTRODUCTION

This document sets out the Company's neonatal care leave policy. Under UK employment laws, all employees who satisfy certain conditions are entitled to the following:

- i. neonatal care leave and pay following the birth or adoption of their child on or after 6 April 2025; and
- ii. a right to return to work after neonatal care leave.

The right is an individual right, so both parents are entitled to neonatal care leave.

2. DEFINITION

In this policy, neonatal care means:

- medical care that your child receives in a hospital;
- medical care that your child receives in any other place where the following applies:
 - your child was previously admitted to a hospital as an inpatient and needs continuing care after leaving the hospital;
 - the care is under the direction of a consultant; and
 - the care involves ongoing monitoring and visits from healthcare professionals arranged by the hospital where your child was an inpatient; or
- palliative or end-of-life care.

3. ELIGIBILITY

Neonatal care leave is available to take in two tiers:

Tier 1

- The tier 1 period begins when your child starts receiving neonatal care and ends on the seventh day after your child is discharged. If you take neonatal care leave in the tier 1 period, you can take it in one continuous block or a number of non-continuous blocks of a minimum of one week

at a time.

Tier 2

- The tier 2 period is any remaining period (within 68 weeks after your child's date of birth) that is not part of the tier 1 period. If you take neonatal care leave during the tier 2 period, you must take the leave in one continuous block.

Regardless of your length of employment, you are entitled to take neonatal care leave if you fall into one of the following categories:

- you are the child's parent and have responsibility for upbringing the child; or
- you are the partner of the child's mother and have main responsibility for the upbringing of the child (apart from the mother); or
- for adoptions within the UK:
 - you are the child's adopter and have or expect to have responsibility for the upbringing of the child;
 - you are the child's prospective adopter (in a "foster to adopt" arrangement) and have or expect to have responsibility for the upbringing of the child; or
 - you are the partner of the child's adopter or prospective adopter and have main responsibility for the upbringing of the child (apart from your partner); or
- for adoptions from overseas:
 - you are the child's overseas adopter and have or expect to have responsibility for the upbringing of the child; or
 - you are the partner of the child's overseas adopter and have main responsibility for the upbringing of the child (apart from your partner); or
- for surrogacy arrangements:
 - you have applied or intend to apply for a parental order within a period of six months;
 - you expect the parental order to be granted; and
 - you have or expect to have responsibility for the upbringing of the child.

* In this policy, partner includes someone, of whatever sex, who lives with the mother or the child in an enduring family relationship but who is not their child, parent, grandchild, grandparent, sibling, aunt, uncle, niece or nephew.

Additionally, the following conditions must be satisfied:

- your child was born on or after 6 April 2025;
- your child started receiving neonatal care within 28 days after the date on which they were born (the 28 days are counted from the day after the child is born);
- the neonatal care has lasted seven days or longer without interruption (the seven days are counted from the day after the neonatal care started);
- you are taking the leave to care for your child, and
- you have complied with the relevant notice and declaration requirements set out in this policy.

4. TIME OFF FOR NEONATAL CARE LEAVE

If you fall within the eligibility criteria above, you will be entitled to a maximum of 12 weeks neonatal care leave, even if multiple children from the same pregnancy require neonatal care, for the purposes of caring for that child/children.

The amount of neonatal care leave that you can take is one week for every week your child has spent in neonatal care without interruption. A week is defined as a period of seven days starting from the day after the neonatal care began. You can start your leave on any day after your child has received seven days of uninterrupted neonatal care. Your neonatal care leave will start on the day specified on your notice, or if you have given notice and you are already at work on that day, your neonatal care leave will start the following day.

5. LIMITATIONS ON THE RIGHT TO LEAVE

The leave must be taken in blocks of one week or more. Any neonatal care leave must end within 68 weeks of your child's date of birth. In adoption cases, your entitlement begins either after the child has been placed for adoption (for adoptions within the UK) or after the child has entered Great Britain (for adoptions from overseas).

6. NOTICE REQUIREMENTS

Notice of your intention and entitlement to take neonatal care leave must be given using the Company's neonatal care leave form.

i. Notice during tier 1 period:

You should notify your line manager by telephone or email, before your first day of absence, or as soon as reasonably practicable.

There is no expectation on you to complete the Company's neonatal care leave form straightaway while your child is receiving neonatal care, we do request that this is sent within 28 day's of the first day of absence or as soon as reasonably practicable.

ii. Notice during tier 2 period:

You must give HR a minimum of 15 days' written notice of your intention to take neonatal care leave or as soon as reasonably practicable, if you intend to take a single week of neonatal care leave.

You must give HR a minimum of 28 day's written notice of your intention to take neonatal care leave or as soon as reasonably practicable, if you intend to take two or more consecutive weeks of neonatal care leave.

7. DISRUPTION OF NEONATAL CARE LEAVE

Employees who have accrued entitlement to neonatal care leave may still be entitled to take their neonatal care leave if in the case of an adoption the placement is disrupted, either because the child is returned after having been placed for adoption, ceases to live with the overseas adopter; or in the case of a surrogacy arrangement, the parental order does not proceed.

If you wish to cancel your neonatal care leave, please inform your line manager in writing as soon as reasonably practicable.

If you suffer a bereavement, you may also be entitled to parental bereavement leave.

8. NEONATAL CARE LEAVE PAY

Statutory neonatal care pay is payable during your neonatal care leave period, provided that you are entitled to it.

The rate of statutory neonatal care pay is set by the Government for the relevant tax year, or at 90% of your average weekly earnings (whichever is

lower).

You will qualify for statutory neonatal care pay if all the following apply:

- you are entitled to take neonatal care leave;
- you have at least 26 weeks' continuous employment with us at the end of the relevant week;
- you remain in continuous employment from the end of the relevant week (or from the child's birth if they were born before the relevant week);
- your average weekly earnings are not less than the lower earnings limit for national insurance contributions;
- you have complied with the relevant notice and evidential requirements and are able to provide the declarations as set out in this policy; and
- you have confirmed when you wish to start receiving statutory neonatal care pay on the Company's neonatal care leave form.

In this policy "relevant week" means the 15th week before the expected week of childbirth if you are entitled to statutory maternity or paternity pay. In all other cases, it means the week before the neonatal care begins.

Neonatal care pay is treated as earnings and is therefore subject to PAYE and national insurance deductions.

9. YOUR OBLIGATIONS DURING NEONATAL CARE LEAVE

You will remain employed by the Company during any period of leave and continue to be bound by the terms of your contract concerning:

- i. your duty to act in good faith towards the Company (including the obligation not to hold any other employment or be interested in any other business during your employment);
- ii. your duties of confidentiality; and
- iii. your obligations to give notice to the Company to terminate your employment.

Shortly before your neonatal care leave starts, the company will discuss arrangements for you to keep in touch during your leave, should you wish to do so. The Company reserves the right in any event to maintain reasonable

contact with you from time to time during your neonatal care leave.

10. YOUR RIGHTS DURING PARENTAL LEAVE

i. Your contract of employment

You will remain employed by the company during any period of leave and remain entitled to benefit from your contractual terms and conditions relating to:

- notice of termination of employment;
- compensation in the event of redundancy; and
- disciplinary and grievance procedures.

ii. Pension Contributions

The Company will continue to make pension contributions based on your normal earnings during any period of paid neonatal care leave. The pension contributions that you make will be based on the actual pay that you receive during your neonatal care leave.

The Company's pension contributions will cease during any period of unpaid neonatal care leave.

iii. Continuous employment

Your period of continuous employment with the Company continues while on neonatal care leave.

iv. Holiday entitlement

Although you are not entitled to take holiday during neonatal care leave, you will continue to accrue rights to holiday during neonatal care leave, but only to the extent necessary to comply with the Working Time Regulations 1998 (i.e. four weeks' paid holiday in any year, including bank holidays).

v. Other leave entitlements

You are entitled to take neonatal care leave in addition to any other statutory leave that you may be eligible to take. Once a period of statutory leave has already started, neonatal care leave can be taken

after completion of the other statutory leave.

If you have already started a period of neonatal care leave during the tier 1 period but need to begin another type of statutory leave, your neonatal care leave will be temporarily paused immediately before the other statutory leave begins. You can then resume the remaining weeks of your neonatal care leave in one of two ways:

1. if you are still within the tier 1 period - immediately after the end of the other period of statutory leave; or
2. if you have transitioned into the tier 2 period - immediately after any other neonatal care leave taken during the tier 2 period.

You cannot take neonatal care leave in the tier 2 period if, at the time of giving notice, you are aware that the leave will overlap with another type of statutory leave.

11. YOUR RIGHTS ON RETURNING FROM LEAVE

On resuming work after a single period of neonatal care leave, you are entitled to return to the same job as you occupied before commencing neonatal care leave on the same terms and conditions of employment as if you had not been absent.

However, where the period of neonatal care leave:

- a) follows on immediately from maternity, adoption, paternity leave or shared parental leave and your total time on leave is more than 26 weeks; and/or
- b) includes more than four weeks of ordinary parental leave (taken in relation to any child), regardless of the total length of the leave.

In these circumstances, you have the right to return to the same job, unless this is not reasonably practical, in which case you have the right to return to a suitable alternative job, on terms and conditions that are no less favourable than would have applied if you had not been absent.

You are protected from being subjected to a detriment and/or from being unfairly dismissed because you exercised your right to take neonatal care leave.

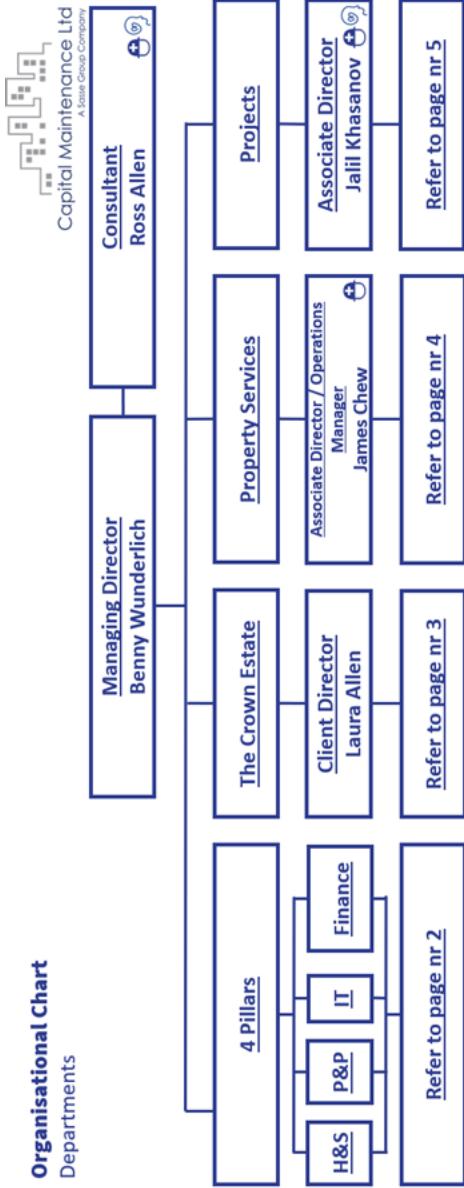
12. GENERAL

The Company may ask you to give a brief explanation of your responsibility for the child and may ask for proof of your responsibility (eg child's birth or adoption certificate, proof of child's entitlement to disability living allowance).

For new employees joining the Company, the Company reserves the right to request from previous employers' confirmation of neonatal care leave already taken and to deduct that leave from any remaining entitlement once the qualifying period has been achieved.

The policy will be regularly reviewed by the Company and may be ended or amended at any time. The Company may omit any element of this policy where it considers it appropriate.

Organisational Chart
Departments

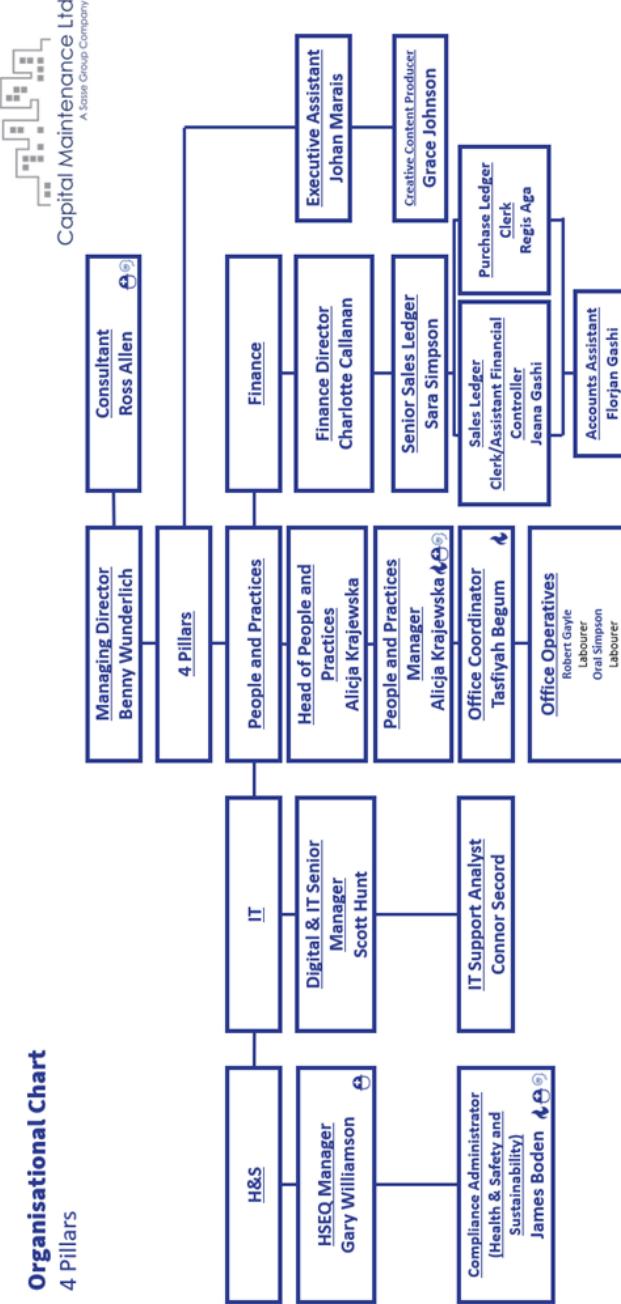


First Aiders:
 - First Aider
 - Mental Health First Aider

SECTION 4 – OFFICE GUIDANCE

4.1 COMPANY WIDE ORGANISATIONAL CHART

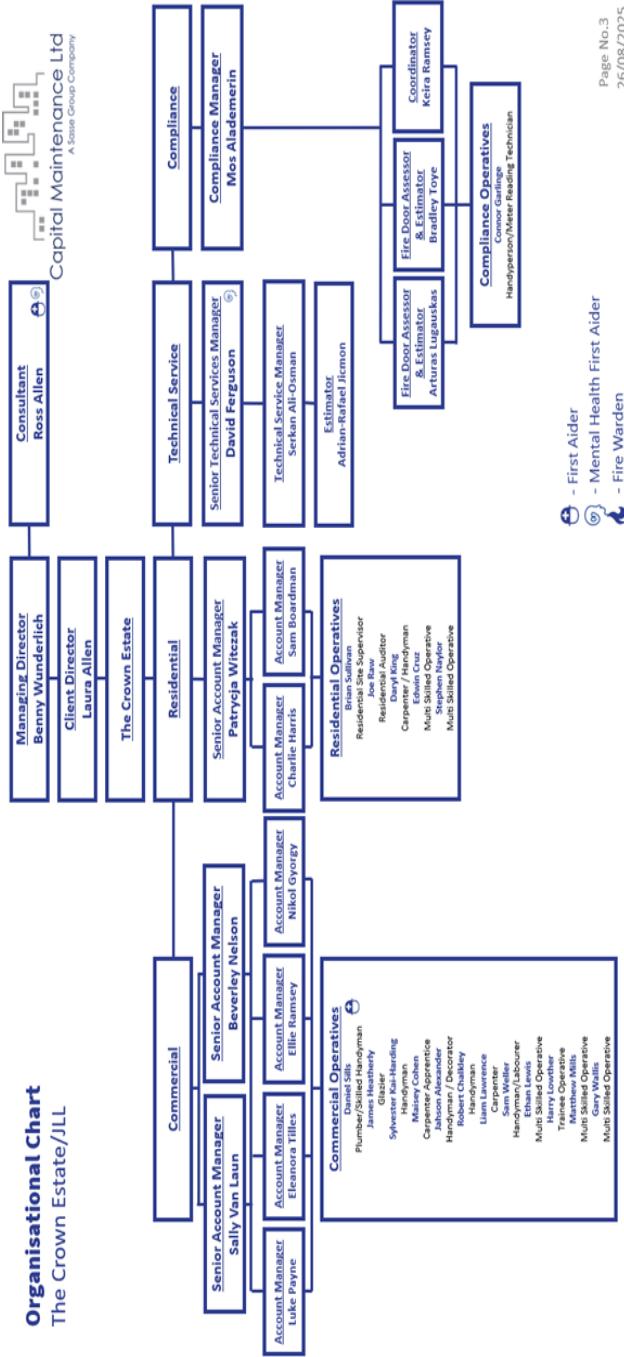
Organisational Chart



- First Aider
- Mental Health First Aider
- Fire Warden

Organisational Chart

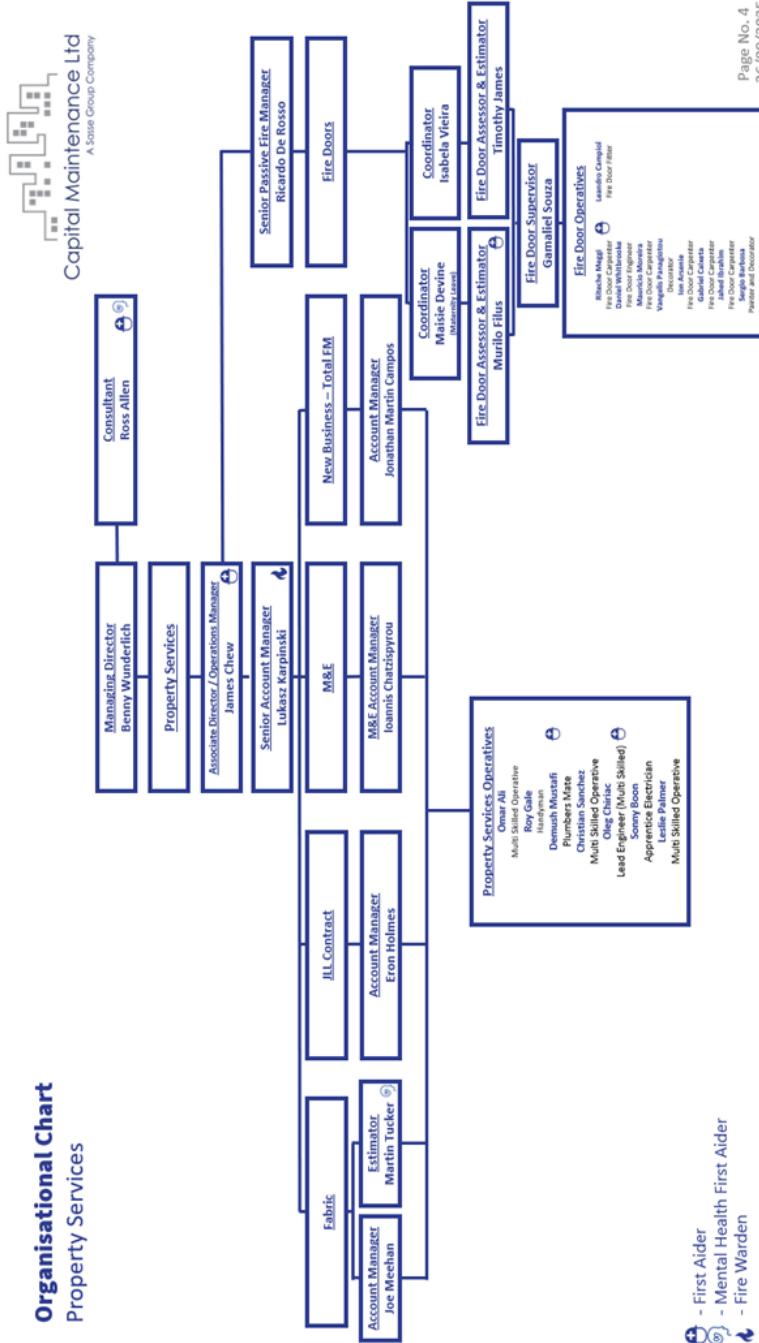
The Crown Estate/JLL



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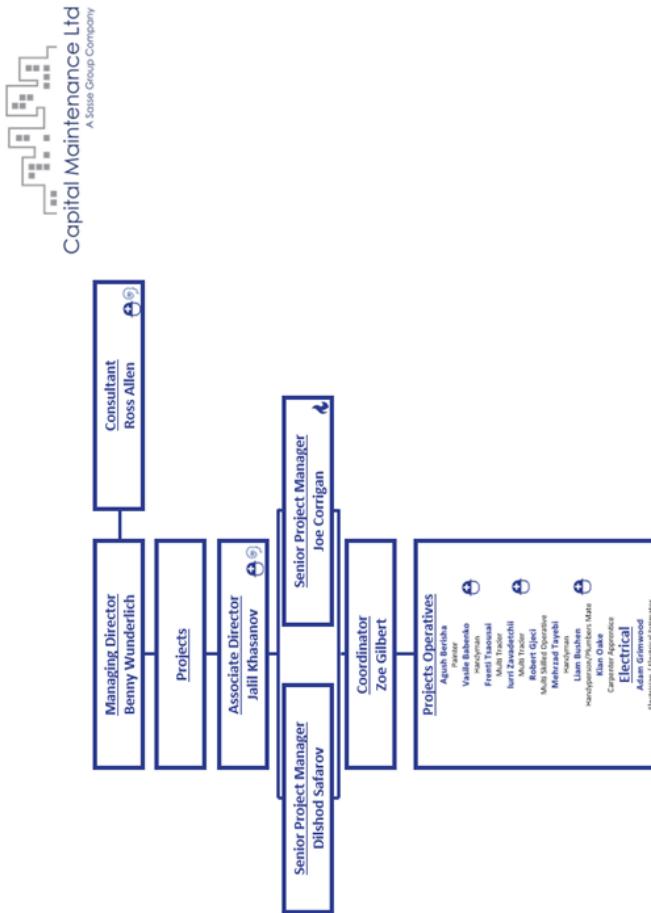
Organisational Chart

Property Services



Organisational Chart

Projects



⊕ - First Aider

⌚ - Mental Health First Aider

⚡ - Fire Warden

Benny Wunderlich Managing Director	Ross Allen Consultant	Jall Khasanov Associate Director	Charlotte Callanan Finance Director	Laura Allen Client Director
Property Services				
James Chew Associate Director / Operations Manager	Dilshod Safarov Senior Project Manager	Johan Marais Executive Assistant	Grace Johnson Creative Content Producer	4 Pillars
Lukasz Karpiński Senior Account Manager	Joe Corrigan Senior Project Manager	Sara Simpson Senior Sales Ledger Clerk	Finance	The Crown Estate/JLL
Ioannis Chatzispyrou M&E Account Manager	Ricardo De Rosso Senior Passive Fire Manager	Zoe Gilbert Coordinator	Projects	Compliance
Fabric	Isabella Vileira Coordinator	Vasilie Babinko Handyman	Agiash Berisha Painter	Technical Service
Joe Meethan Account Manager	Maisie Devine (Maternity Leave)	Freniti Tsousouli Multi-Trader	Iurrit Zavadechii Multi-Trader	Compliance
Martin Tucker Estimator	Timothy James	Kian Oake Carpenter Aspirational	Robert Gjelid Multi-Skilled Operative	Commercial
New Business – Total FM				
Jonathan Martin Campos Account Manager	Murillo Filus Fire Door Assessor and Estimator	Mehrzad Tayebi Handyman	Scott Hunt Digital and IT Senior Manager	Residential
JLL Contract	Gamaliel Souza Fire Door Supervisor	Liam Bushen Handyperson/Plumbers Mate	Connor Seccord IT Support Analyst	Residential
Eron Holmes Account Manager	Fire Doors	Kian Oake Carpenter Aspirational	Alicia Krajewska Head of People and Practices	Residential
Property Services				
Owner Ali Multi-Discipline Key Holder Housekeeper Dishwasher Plumber / Mass Christian Sanchez Multi-Skilled Operative	David Weller David Weller Fire Door Assessor Vangelis Panagiotis Dishwasher Fire Door Assessor Global Events Fire Door Assessor Fire Door Assessor Fire Door Assessor Sergio Caramer Pete-Lee Boulton Leanne Palmer Multi-Skilled Operative	One Owner Leanne Palmer Brett Staines Apprentice Electrician Leslie Palmer Multi-Skilled Operative	Gary Williamson HSEQ Manager <i>(Health, Safety, Environment and Quality)</i>	H&S
First Aider Mental Health First Aider	Tasfiyah Begum Office Coordinator	Robert Gaile Labourer	James Boden Compliance Administrator <i>(Health & Safety and Sustainability)</i>	Office
Fire Warden	Office	Oral Singapuri Labourer		

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Roles and Responsibilities

Managing Director - Directing All Business Activities	Senior Project Manager - Management of Dedicated Projects, Management of Dedicated Department/Team
Consultant - Consulting in Directing All Business Activities	Executive Assistant - Executive Administrative Support for the Business Directors
Client Director - Directing Business Activities for Dedicated Client, Management of Dedicated Department/Team	Digital and IT Senior Manager - Management of all Business Information Technology, Management of Dedicated Department/team
Associate Director - Assisting The Managing Director in Directing All Business Activities, Management of Dedicated Department/Team	IT Support Analyst - Technical Support for Business Information Technology
Finance Director - Payroll for All Employed Staff, Management and Supervision of the Finance Department and All Finance Procedures within the Business	Assistant Financial Controller - Assisting the Financial Controller in Payroll for All Employed Staff and All Finance Procedures within the Business
Operations Manager - Management of All Operations in Dedicated Department, Management of Dedicated Department/Team	Senior Sales Ledger Clerk - Overseeing of All Business Incoming Transactions
Senior Account Manager - Management of Dedicated Client Accounts, Management of Dedicated Department/Team	Sales Ledger Clerk - Overseeing All Business Outgoing Transactions, Payroll for Self Employed Staff
Account Manager - Management of Dedicated Client Accounts	Accounts Assistant - Assisting the Finance Team, AWS
Coordinator - Coordination of Dedicated Client Accounts, Coordination of Duties for Dedicated Department/Team	HSEQ Manager - Management and Supervision of the H&S Department and All H&S Related Tasks
Senior Technical Services Manager - Technical Advice, Estimates, Quotes, QC's, Tenders/Contract Management, Site Visits/Surveys, Management of Dedicated Department/Team	Compliance Administrator - Administrative Duties in relation to Business Health and Safety
Technical Service Manager - Technical Advice, Estimates, Quotes, QC's, Tenders/Contract Management, Site Visits/Surveys, Management of Dedicated Department/Team	Office Coordinator - Management of Company Premises, Management of Company Storerooms and Assets
Estimator - Estimates, Quotes, Site Visits/Surveys	People and Practices Manager (HR) - Management of All Duties Related to Human Resource Management in the Business
Compliance Manager - Supervision of All Contract Compliance, Certification, Management of Dedicated Department/Team	Head of People and Practices - Management of the People and Practices Team, Management of All Duties Related to Human Resource Management in the Business
Senior Passive Fire Manager - Management of the Passive Fire Team, Management of Dedicated Client Accounts	Creative Content producer - Producing Content for the Business Development Team and Wider Business
Fire Door Assessor/Estimator/Inspector - Fire Door Inspection, Estimates, Quotes, Site Visits/Surveys	Project Manager - Management of Dedicated Projects

4.2 DRESS CODE - CODE OF CONDUCT POLICY

DRESSCODE

Our dress code policy outlines how we expect our employees to dress for work. Employees should note that their appearance matters when representing our company in front of clients, visitors or other parties. An employee's appearance can create a positive or negative impression that reflects on our company and culture.

The dress code for office staff is smart-casual, although the following rules will always apply:

- all clothes must be work-appropriate and the following must NOT be worn in the office:
 - flip-flops;
 - exercise / sportswear (including hooded sweatshirts);
- Clothes that are too revealing or inappropriate are not permitted;
- all clothing must be clean and in good condition. Obvious rips, tears or holes are not permitted;
- employees must avoid clothes with offensive or inappropriate logo's / slogans / designs,
- refrain from wearing branding/logos other than the Capital Maintenance Ltd or TCE logo; and
- smart shorts are permitted during warmer weather only.

Office Staff carrying out positions were attending site is part of their job role, is required to wear the „Estimator Uniform” or their own clothing items up to the same standard. The estimator uniform standard is to be send via email to the individual carrying out the described above positions, upon their start within the company.

All employees that are expecting to have meetings with third parties to be held either at our offices or externally will be required to wear smart business attire.

All operatives within the business are required to wear uniform as stated bellow and should adhere to the below at all times during working hours. Operatives should not wear attire that is not listed below or/and is branded with another company's logo. A Hi-Vis branded with the Capital Maintenance

Ltd logo is to be carried by the engineer at all times and worn when needed. Additional PPE may be required to be worn as instructed on the specific job description.

Capital Maintenance Ltd Operatives, are required to wear the following uniform:

- Black Work Trousers;
- Capital Maintenance Logo Black Uniform that consists of items such as Polo's, Jumpers, Softshell Jackets, Waterproof Jackets, HI-Vis's, Summer Caps and Winter Beanies (provided by the Company);
- Work Boots;

The Crown Estate Contract Operatives, are required to wear the following uniform:

- Navy Work Trousers from a sustainable material (provided by the Company);
- TCE Logo Navy Sustainable Uniform that consists of items such as Polo's, Fleeces, Softshell Jackets and Waterproof Jackets (provided by the Company);
- Work Boots;

All operatives and other employees required to attend site, are required to carry a Company Id Card with them at all times.

Repeated disregard of this policy may result in disciplinary action.

The Company reserves the right to amend this policy when necessary.

BEHAVIOUR

All employees are expected to conduct themselves in a professional manner at all times. Staff are expected to behave in a courteous, considerate and helpful manner both to third parties and to one another. Oppressive, bullying or disrespectful behaviour will not be tolerated. If any members of staff behave in such a way, disciplinary procedures may be invoked. Violent behaviour towards staff or others with whom staff come into contact will lead to disciplinary action.

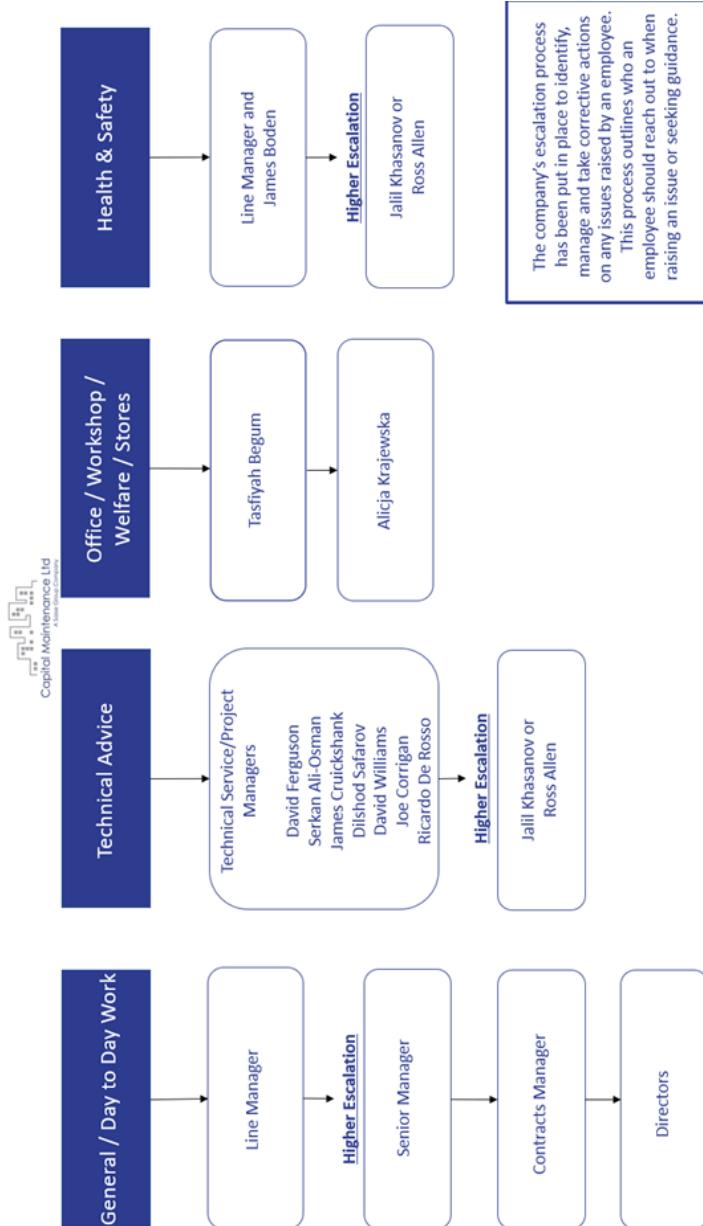
4.3 HOUSE RULES POLICY

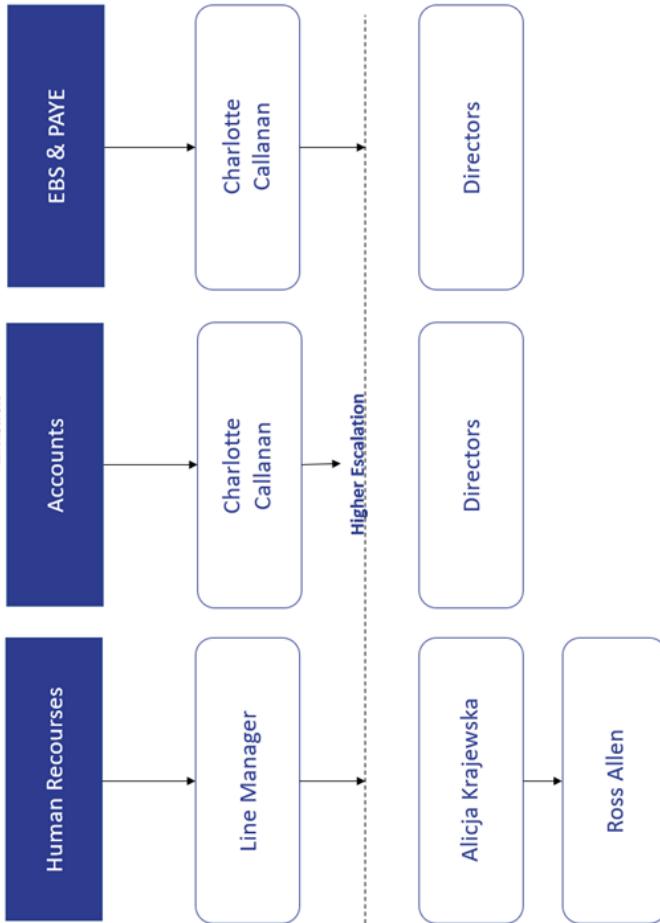
The Company take pride in the appearance of our offices and in order to keep the offices looking neat, clean and tidy, we have put some general House Rules in place, as follows:

1. No eating at desks. Dry, non-offensive smelling snacks and drinks are OK, but please use the kitchens / seating areas provided for lunch breaks. Refrain from bringing in and consuming strong-smelling foods.
2. The kitchen / lunch area has been provided for your comfort. Please ensure that you keep the area clean and tidy and be respectful of others. All dishes and cutlery are to be washed immediately or placed in the dishwasher after use. Rubbish is to be thrown away and any surfaces are to be wiped down after use.
3. Appropriate noise levels are to be at all times and especially during lunch hours;
4. Clear desk policy – please ensure desks are kept clear at the end of each day and are presentable throughout the day. In-trays and pedestals have been provided to store your work.
5. The area around your desk is to be kept tidy and clear of any materials, deliveries or other items;
6. Coats are to be stored in the cloak area of the kitchen lobby, no items of clothing are to be kept hanging on the back of the chairs in the office;
7. All personal mobile notifications should be silenced to minimise the noise levels and distraction to others in the shared office space. Personal or sensitive calls are to be taken in private;
8. Should you notice any breakages, spillages, potential hazards, please notify the Office Manager; and
9. No building materials or deliveries to be left within the office space. Please use the post room.

SECTION 5 - POLICIES AND PROCEDURES

5.1 COMPANY ESCALATION CHART





5.2 BULLYING AND HARASSMENT

INTRODUCTION

The purpose of this policy is to ensure that all Capital Maintenance Ltd.'s workers are treated with dignity, respect and are free from harassment, intimidation, or any form of bullying at work. Any behaviour which undermines this purpose will not be tolerated. Under the Health and Safety at Work Act 1974, we have a duty to provide our workers with a safe place and system of work. This includes a workplace free from harassment, intimidation and bullying. Breach of this policy will be dealt with under Capital Maintenance Ltd.'s disciplinary procedure and, in serious cases, may be treated as gross misconduct leading to summary dismissal.

This policy covers all individuals working for Capital Maintenance Ltd. at all levels and grades, including senior managers, officers, directors, employees, contractors, trainees, home-workers, part-time or fixed-term employees, and agency staff (collectively known as "workers" in this policy).

DEFINITION OF HARASSMENT AND BULLYING

Harassment is any unwanted physical, verbal or non-verbal conduct which has the purpose or effect of, affecting a worker's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment. Such conduct is commonly related to sex, sexual orientation, marital status, gender reassignment, race, religion, colour, nationality, ethnic or national origin, disability, or age. Harassment generally arises where a worker has made it clear that they find certain behaviour unwelcome and that behaviour has continued unchanged. Harassment can also arise as a result of a single incident provided it is sufficiently serious. It is important to remember that even though the conduct may only be unwanted or offensive to one individual it can still amount to harassment. Employees who believe they are being subjected to harassment should not hesitate to use the procedures set out below. All staff should consider whether their actions could be offensive to others. Examples of harassment might include:

- unwanted physical contact, ranging from touching or brushing against another employee's body to assault or coercing sexual relations;
- unwelcome sexual advances, propositions or pressure for sexual activity;
- continued suggestions for social activity within or outside the workplace after it has been made clear that such suggestions are unwelcome;

- offensive or intimidating comments;
- suggestions that sexual favours may further an employee's career or that refusal of sexual favours may hinder it;
- the display of pictures, objects or written materials that may be considered pornographic or offensive to particular ethnic or religious groups;
- conduct that denigrates or ridicules a worker because of his or her sex, race, sexual orientation, disability, religion or age including abuse or insults about appearance or dress;
- insensitive jokes or pranks; and
- shunning an employee, for example, by deliberately excluding him or her from conversation.

This list is not exhaustive and other behaviour may constitute harassment.

Bullying means offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power intended to undermine, humiliate, denigrate or injure a colleague. Bullying does not include legitimate and constructive criticism of your performance or behaviour, an occasionally raised voice, or an argument. Bullying can range from extreme forms such as violence and intimidation to less obvious actions such as deliberately ignoring someone.

Some further, non-exhaustive, examples of bullying are:

- persistent criticism;
- overbearing supervision;
- unjustifiably excluding colleagues from meetings/communications;
- shouting or swearing at people in public and private;
- spontaneous rages, often over trivial matters;
- deliberately sabotaging or impeding work performance;
- setting individuals up to fail by imposing impossible deadlines;
- removing areas of responsibility and imposing menial tasks; and
- blocking applications for holiday, promotion or training.

This policy covers harassment or bullying which occurs both in the workplace itself and in settings outside the workplace, such as business trips, events or social functions organised for or on behalf of the Company and on or off our premises.

COMPLAINTS OF BULLYING AND HARASSMENT

INFORMAL RESOLUTION

Workers who consider that they are being bullied or harassed should initially attempt to resolve the problem informally. This should be done by explaining clearly to the individual concerned that the behaviour is not welcome, that it offends or makes the recipient uncomfortable and that it interferes with their work. If the worker is unable to do this verbally, a written request explaining the distress which the behaviour is causing may be handed to the harasser. If you are in any doubt as to whether an incident or series of incidents which have occurred constitute bullying or harassment, then in the first instance you should approach HR confidentially, on an informal basis. They will be able to advise you as to how the matter should be dealt with.

Anyone who has been subjected to harassing or bullying behaviour may seek confidential assistance from a manager. Managers will provide confidential advice and assistance to workers who have been bullied or harassed and will assist in the resolution of any problems, whether through formal or informal means.

An informal approach to a manager will be treated as completely confidential and will not result in any report to anyone within the Company unless the worker agrees.

If the worker finds it too difficult or embarrassing to take up the matter themselves, a manager will participate in an informal meeting between the worker and the individual concerned. Alternatively, at the worker's request, the manager may approach the individual on their behalf.

The informal stage will not result in any formal internal investigation or disciplinary action. It is intended to enable the worker to resolve the matter themselves without it going any further in the Company.

If a worker believes they have been subjected to conduct amounting to a criminal offence (such as a sexual assault), the worker is entitled to seek the assistance of management. They will accompany the worker to make a formal complaint to a police officer or to provide the worker with any other assistance they may require.

If the conduct continues or if it is not appropriate to resolve it informally, you should follow the formal procedure set out below.

FORMAL RESOLUTION

Where informal resolution is neither appropriate nor requested, or where the outcome has been unsatisfactory, a worker may bring a formal written complaint to management. The complaint should include the name of the Director, (and where possible), the name of the harasser or bully, the nature of the harassment or bullying, the dates and times when the harassment or bullying occurred, the names of any witnesses to the harassment or bullying (if any) and the action that the worker has taken to stop the harassment or bullying. If so desired, the manager who assisted with the informal resolution will help the worker to prepare their complaint.

When a complaint is received, the Company will promptly investigate the allegation in a fair, confidential and expeditious manner. An investigative officer with suitable experience (at least of equal grade/status with the alleged harasser/bully) and with no prior involvement in the complaint will be appointed and a timetable will be set down and communicated to all parties.

Investigations will be carried out with sensitivity and with due respect for the rights of both the complainant and the alleged harasser/bully. Your name and the name of the alleged harasser/bully will not be divulged other than on a “need to know” basis to those individuals involved in the investigation.

As part of the investigation, the investigative officer will meet with you to hear your account of the events leading to your complaint. You have the right to be accompanied by a colleague or a Trade Union official of your choice. The investigative officer will also meet with the alleged harasser or bully who may also be accompanied by a colleague or Trade Union official of their choice. It may also be necessary to interview witnesses to any of the incidents mentioned in your complaint. Where it is necessary to interview witnesses, the importance of confidentiality will be emphasised to them and everyone will be strictly required not to discuss the complaint with colleagues or friends. Breach of confidentiality may give rise to disciplinary action under the Company's dismissal and disciplinary procedures.

The investigation will focus on the facts of the complaint. Notes will be kept of all stages of the investigation and those interviewed will receive notes of the interview to agree. Parties will not be required to repeat distressing or embarrassing details any more than is necessary.

Where possible, consideration will be given to ensure that the complainant and the alleged harasser or bully are not required to work together whilst the complaint is under investigation. This may involve suspending the alleged harasser/bully on full pay, temporarily redeploying them or altering

reporting lines or other managerial arrangements pending the outcome of the investigation. Both the complainant and the alleged harasser/bully will be kept informed of the progress of the investigation.

At the conclusion of the investigation, the investigative officer will submit a report to a senior manager nominated to consider the complaint. The senior manager will report their finding back to you usually within four weeks of your complaint first being reported. A copy of the investigative officer's report together with the senior manager's findings will be provided to you and to the alleged harasser/bully.

If it is determined that inappropriate conduct has been committed by one of the Company's workers, the Company will take such action as is appropriate under the circumstances. The penalty imposed upon a worker found guilty of bullying or harassment will be consistent with those detailed in the dismissal and disciplinary procedures. Where a lesser penalty is appropriate, for example, a written warning, the Company will seek to ensure that the victim of the bullying or harassment is able to continue working without embarrassment or anxiety.

Workers who, in good faith, make complaints under this policy will be protected from intimidation or victimisation in connection with their involvement. If you have been subjected to any such intimidation or victimisation you may raise a complaint in writing under this procedure or the grievance procedure. The situation will also be monitored to ensure that the bullying or harassment has stopped.

Even where a complaint is not upheld, for example where the evidence is inconclusive, consideration will be given to how the ongoing working relationship between the worker and the alleged harasser/bully should be managed.

If you are not satisfied with the outcome of the investigation, you have the right to appeal the decision within 14 days of being notified of the outcome. You should submit your full written grounds of appeal to the appropriate manager. The appropriate manager may nominate another manager to hear your appeal. Where practicable this will be a manager senior to the manager who originally considered the complaint. The person hearing your appeal will meet with you to discuss your appeal. You may be accompanied by a colleague or a trade union official of your choice. You will be notified of the outcome of the appeal within seven days of this meeting. This is the final stage of the formal procedure.

Any complaint that is unfounded and not made in good faith, for example a malicious complaint, will be treated as a disciplinary offence.

GENERAL

Details of all formal complaints of bullying and harassment will be collated by HR and Management. These will be reviewed annually with a view to ensuring that every effective step has been taken to prevent bullying and harassment at work and to monitor the effectiveness of the complaints procedure.

The Company needs the assistance of all of its workers to ensure that the working environment is bullying and harassment free. Any worker who witnesses an act of bullying or harassment should immediately report it to a Manager

5.3 DISCIPLINARY PROCEDURE

PURPOSE

Our disciplinary procedure, outlined below, exists to make sure that there is fair and consistent treatment for all those whose conduct or work performance falls below the standard required by the Company. The Company believes it is in our mutual interest to have and observe standard procedures. The disciplinary procedure is set out in stages, so that it allows employees to improve their standards of conduct and/or work performance over a period of time. It is designed to be corrective and not to punish and allows any disciplinary issues that may arise to be resolved speedily and effectively.

The following procedure will apply to all employees with at least 2 years' service. However, this procedure is not a term of the contract of employment and is subject to review from time to time.

Employees will be advised of any changes to the procedure by HR or Management.

POLICY DETAILS

In some cases, due to the serious nature of the alleged misconduct or performance problems, it may be necessary to by-pass the initial stages of the procedure set out below. Where such circumstances apply, this will be made clear to you.

RIGHT TO BE ACCCOMPANIED

If you are required to attend a disciplinary hearing, you have the right to be accompanied by a fellow employee, a trade union representative or an official employed by the trade union. A disciplinary hearing is a hearing that could result in the Company giving you a formal warning, taking some disciplinary action against you, or confirming disciplinary action taken against you.

Where an informal discussion is being held by your immediate Manager regarding your performance then the right to be accompanied does not normally apply.

Your chosen representative/colleague will be allowed to put your case, sum up your case, confer with you during the hearing and respond on your behalf

to any views expressed, but will not be allowed to answer questions on your behalf or prevent the Company from explaining the case to you.

You are responsible for ensuring that your companion is willing to act in this way.

Your request for a companion must be a reasonable one. When choosing a companion, it is important to bear in mind that it would be unreasonable to insist on being accompanied by a colleague where their presence would prejudice the hearing or where they may have a conflict of interest.

Should your chosen representative/colleague not be able to attend the meeting at the time proposed by the Company, you may request an adjournment of up to five working days. It is then your responsibility to provide the Company with a suitable alternative date for the rearranged meeting within those five working days.

The Company will allow an employee reasonable time off from their normal duties to act as an employee's representative.

DISCIPLINARY PROCEDURE

Informal Stages

Initially, most cases involving minor conduct issues and instances of poor performance will be dealt with informally by your Manager or in the case of a Manager, their Senior Manager or Management. The Company expects this to resolve most workplace problems and such action should not constitute initiation of the formal disciplinary procedure.

If it is not possible to resolve a problem by means of an informal discussion, or if the conduct of an employee is sufficiently serious, then the disciplinary procedure will be used by the Company.

Stage 1 – Formal Verbal Warning

If it is inappropriate for a matter to be raised informally, the formal disciplinary procedure will usually be instigated at stage 1. This may happen if there is a repetition of behaviour which has been raised with you on an informal basis, if unsatisfactory performance does not improve, or if a Manager's concerns about you, or complaints made against you, are of a serious nature.

If you receive a stage 1 verbal warning, a note of the discussions will be kept on your personal file detailing the complaint; if appropriate the improvement

required, the period for improvement, and that further action will result if the required standards are not met or there is a further offence. The warning will remain current for 6 months from the date you are notified of the warning.

Stage 2 – 1st Written Warning

If you continue to fail to meet the level of performance required, you are suspected of repeated or further misconduct, or if misconduct appears to be sufficiently serious, the formal disciplinary procedure will be instigated at stage 2.

If you are found to be at fault, a written warning will be issued detailing the complaint, the improvement required (if appropriate), and the period for improvement. The written warning will indicate the further action that will result if the required standards are not met and sustained. You will be asked to acknowledge receipt of the warning, which will be kept on your personal file for a set period of time, which will be confirmed in the letter.

Stage 3 – 2nd Written Warning

If you continue to fail to meet the level of performance required, you are suspected of repeated or further misconduct, or if misconduct appears to be sufficiently serious, the formal disciplinary procedure will be instigated at stage 3.

If you are found to be at fault, a written warning will be issued detailing the complaint, the improvement required (if appropriate), and the period for improvement. The written warning will indicate the further action that will result if the required standards are not met and sustained. You will be asked to acknowledge receipt of the warning, which will be kept on your personal file for a set period of time, which will be confirmed in the letter.

Stage 4 – Final Written Warning

If you continue to fail to meet the level of performance required, are suspected of further misconduct, or if your misconduct appears to be sufficiently serious to warrant a last stage warning, but not sufficiently serious to justify dismissal, stage 4 of the disciplinary procedure will be invoked.

If you are found to be at fault, a final warning will be issued. The final written warning will state that failure to meet or sustain the required standards or the commission of further misconduct offences may result in your dismissal. You will be asked to acknowledge receipt of this warning, which will be kept on your personal file. The warning will remain current for a set period of time from the date you are notified of the warning.

Stage 5 – Dismissal

If after you have been given a final written warning you still fail to meet or sustain the required level of performance or you are suspected of further misconduct or an act of gross misconduct, the Company will usually have no option but to terminate your employment.

No decision to terminate your employment will be considered unless the Company has followed the minimum requirements set out in the statutory disciplinary and dismissal procedure which require that the Company abide by the following procedure:

Step 1: statement of grounds for action and invitation to meeting

1. The Company will set out in writing the alleged conduct or characteristics, or other circumstances, which lead the Company to contemplate dismissing or taking disciplinary action against you.
2. The Company will send the statement or a copy of it to you and invite you to attend a meeting to discuss the matter.

Step 2: meeting

1. The disciplinary meeting will take place before action is taken, except in the case where disciplinary action consists of suspension.
2. The disciplinary meeting will not take place unless:
 - a) The Company has informed you of the basis for the statement setting out the allegations and the ground or grounds given in it; and
 - b) You have had a reasonable opportunity to consider your response to that information.
3. You must take all reasonable steps to attend the meeting.
4. After the meeting, the Company will inform you of the decision and notify you of the right to appeal against the decision if you are not satisfied with it.

Step 3: Appeal

1. If you do wish to appeal, you must inform the Company.
2. If you inform the Company of your wish to appeal, the Company will invite you to attend a further meeting.
3. You must take all reasonable steps to attend the appeal meeting.
4. The appeal meeting need not take place before the dismissal or disciplinary action takes effect.
5. After the appeal meeting, the Company will inform you of its final decision.

ADDITIONAL EXPLANATORY POINTS

If necessary to enable an investigation to be carried out thoroughly, or if required due to the serious nature of the allegations made and the nature of your duties, you may be suspended on full pay. During any period of suspension you must comply with the Company's instructions on reporting and attendance at Company premises.

No disciplinary penalty will be imposed without a disciplinary hearing being held after an appropriate investigation.

Disciplinary hearings at Stages 1 to 3 of the disciplinary procedure will be conducted by Management. Hearings at Stage 4 will be conducted by a member of Management other than the person conducting Stage 3.

Before you are required to attend a disciplinary hearing you will be notified in writing of the alleged misconduct or the circumstances which have led to disciplinary action being considered.

Where appropriate you will be provided with details of the Company's investigations and provided with copies of any witness statements taken prior to the disciplinary hearing.

Before any disciplinary action is taken you will be given a reasonable opportunity to consider your response to the issues which have been raised with you in writing.

The Company will ensure that each step and action under the disciplinary

procedure will be taken without unreasonable delay.

The Company will ensure that the timing and location of meetings will be reasonable and that meetings will be conducted in a manner that enables both the Company and you to explain each other's case.

APPEALS PROCEDURE

If you are dissatisfied with any disciplinary action taken against you, including dismissal, you may appeal in writing to Management within three working days of the disciplinary action taken against you, stating the reason for your appeal.

Appeals must be made on legitimate and genuine grounds and not simply as a device to delay the outcome of a reasonable disciplinary action.

The purpose of an appeal is to review the original outcome with a fresh and open mind. The person considering the appeal will decide the basis on which the appeal is to be heard and the procedure to be followed. You will be appropriately informed.

The hearing will normally take place within two weeks of receipt of your written appeal and you will have the right to be accompanied by a work colleague if you wish.

Unless there are exceptional circumstances, such as an appeal which reveals a need for further extensive investigations, you will be informed, in writing, of the decision of the appeal hearing within five working days of the meeting.

This written decision is final and no further appeal may be made.

Where your appeal is against dismissal, the date of your dismissal will not be postponed while your appeal is considered.

GROSS MISCONDUCT

Where the nature of the offence is sufficiently serious to be considered gross misconduct, the disciplinary action that will follow will normally be summary dismissal. This is without notice or pay in lieu of notice.

Dismissal for gross misconduct will only take place after the normal investigations to establish all the facts have been carried out.

Confirmation of the reasons for your dismissal will be given to you in writing, as well as the effective date of termination of your employment. You will also be notified of your right of appeal.

Whether you are dismissed after a final warning or for gross misconduct you have the right to appeal the decision. Please refer to the appeal process above.

Examples of Gross Misconduct

- Conduct which may justify summary dismissal includes, but is not limited, to the following:
- any act of theft, fraud, dishonesty or deliberate falsification of records or other serious acts, which break the mutual duty of trust and confidence between the Company and yourself, or which brings or is likely to bring the Company into disrepute. This includes being in unauthorised possession of the Company's property or any action taken by yourself to assist others in this type of activity;
- Refusal to obey reasonable instructions or other serious insubordination;
- Wilful neglect of duty or serious negligence;
- Being under the influence of drink or drugs whilst at work;
- Any act of harassment, bullying or unlawful discrimination including on the grounds of sex, marital status, race, ethnic origin or nationality, sexual orientation or religious belief;
- Serious breach of an obligation contained in your contract of employment;
- Conviction of a criminal offence (other than a minor offence involving a non-custodial sentence which does not, in the opinion of the Company, affect your ability to discharge your duties or destroy the Company's trust and confidence in you) or any act which may bring the Company into disrepute or have a serious adverse effect on the Company's business interests;
- Fighting or threatening behaviour;
- Unauthorised use or disclosure of confidential information relating to the Company and or its clients, past, present or potential (whether or not for your or another person or Company's financial benefit);
- Unauthorised use of the Company's resources or equipment (including misuse);
- Serious breach of fire or safety regulations;
- Unauthorised possession of, or causing malicious damage to, property belonging to the Company, its employees or its customers;

- Smoking on the Company premises;
- Any serious unauthorised personal use of the electronic mail system or the sending of any materials, whether by the electronic mail system or otherwise, which have abusive, malicious, libellous, lewd or similar contents;
- Wilful damage to the Company's property or the property of its employees;
- Gross indecency or grossly offensive behaviour or language;
- Giving deliberately misleading or incorrect information prior to your employment by or on joining the Company; and
- Financial Crime.

This list is not exhaustive.

5.4 EMPLOYEE RELATIONS POLICY

To create a productive and mutually satisfying employee relations climate, the Company's business objectives and the interests of its employees are recognised. Efforts are continuously directed towards maintaining a constructive relationship and finding mutually acceptable solutions to workplace problems and issues. To ensure this, the following basic principles apply:

- achieve high performance standards by encouraging employee commitment and teamwork and promoting a climate of trust;
- maintain a work environment in which the personal dignity of each individual is respected and discrimination and harassment are not tolerated;
- provide employment conditions that are competitive;
- communicate regularly with employees about the Company's mission, objectives, performance and significant developments; and
- recognise the right of every employee to present a complaint, to appeal against a decision and to receive a response within a reasonable period of time.

If you consider the standards that have been set fall short in any way, please speak to HR.

COMMUNICATION

The Company strongly believes in the effective communication of information to all its employees. We feel this helps promote a greater understanding of our Company's position, the issues it faces and the direction it is taking. We also value the comments and ideas of our staff.

The methods used for communication are designed to encourage a two-way exchange between management and staff. In order to be truly effective, the full commitment of everyone within the Company is essential. Regular communication meetings, both formal and informal are held with advance notice given to all employees. It is in your interest to make every effort to attend and contribute at such meetings.

5.5 EQUALITY, DIVERSITY AND INCLUSION POLICY

INTRODUCTION

Promoting and delivering equality, diversity, and inclusion (EDI) in the workplace is an essential aspect of good people management. It is about creating working environments and cultures where every individual can feel safe, have a sense of belonging and are empowered to achieve their full potential.

PURPOSE

The purpose of this policy is to reinforce Capital Maintenance Ltd.'s commitment to equal opportunity employment for all job applicants and workers in support by the Equality Act 2010. We strive to provide equality, fairness, and respect for all in our employment whether full time, part time or self employed through contractors and sub-contractors. The Company's aim is that our workforce will be truly representative of all sections of society.

The equality strands are:

- Age
- Disability
- Gender Reassignment
- Marriage and Civil partnership
- Pregnancy and Maternity (including Paternity)
- Race (colour, ethnic or national background)
- Religion or Belief (including non-belief)
- Sex
- Sexual Orientation

We do not tolerate discrimination on any of the above strands as well as ethnic or national origin, marital status, and Trade Union membership. We oppose all forms of unlawful and unfair discrimination. Our opposition to all forms of unlawful discrimination includes any discrimination within:

- Pay and benefits
- Terms and conditions of employment
- Dealing with grievances and discipline

- Dismissal
- Redundancy
- Selection for employment, training, and other development opportunities

SCOPE

This policy applies to all areas of employment including recruitment and selection, advertising, training and development, promotion opportunities, pay, benefits, conditions of service, facilities, health and safety, the grievance and disciplinary procedures, termination of employment including redundancy, transfer, and social and recreational programmes.

All members of staff are responsible for the success of this policy and must ensure that they familiarise themselves with it and act in accordance with its aims and objectives.

OUR COMMITMENT

Capital Maintenance Ltd makes the following commitments to our staff.

Create a working environment free of bullying, harassment, victimisation, and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued.

This commitment includes training for all about their rights and responsibilities under the equality, diversity, and inclusion policy. Responsibilities include staff conducting themselves to help the organisation provide equal opportunities in employment, and prevent bullying, harassment, victimisation, and unlawful discrimination.

All staff should understand they, as well as the senior management team, can be held liable for acts of bullying, harassment, victimisation, and unlawful discrimination in the course of their employment against fellow employees, customers, suppliers, and the public.

Take seriously any complaints of bullying, harassment, victimisation and unlawful discrimination by our employees, customers, suppliers, visitors, from the public and any others during the organisation's work activities.

Such acts will be dealt with as misconduct under the organisation's grievance or disciplinary procedures, and appropriate action will be taken. Particularly

serious complaints could amount to gross misconduct and lead to dismissal without notice.

Further, sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence.

Make opportunities for training, development, and progress available to all staff, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the organisation.

Make decisions concerning staff based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act).

Review employment practices and procedures when necessary to ensure fairness, and also update them and the policy to take account of changes in the law.

DISCIPLINARY AND GRIEVANCES

All workers have a duty to act in accordance with this policy, and therefore to treat colleagues with dignity at all times and not to discriminate against or harass other members of staff, whether junior or senior to them. If, after investigation, you are proven to have harassed any other worker on the grounds listed above or otherwise act in breach of this policy, you will be subject to disciplinary action. In serious cases, such behaviour may constitute gross misconduct and, as such, may result in summary dismissal.

The Company will always take a strict approach to breaches of this policy.

If you believe that you may have been disadvantaged on any of the grounds listed above, you are encouraged to raise the matter through the Company's grievance procedure.

If you believe that you may have been harassed on any of the grounds listed above, you are encouraged to raise the matter through either your Team Manager, Contracts Manager or the Health and Safety Manager. Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure.

Staff who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations of a breach in this policy which are found to have been made in bad faith will, however, be dealt with under the Company's disciplinary procedure.

MONITORING AND REVIEW

Monitoring will include assessing how the equality, diversity and inclusion policy, and any supporting action plan, are working in practice, reviewing them annually, and considering and taking action to address any issues. The MD and senior management of Capital Maintenance Ltd are committed to the implementation of this policy.

5.6 FLEXIBLE WORKING

INTRODUCTION

Flexible working is any type of working arrangement that gives some degree of flexibility on how long, where and when an employee works.

ENTITLEMENT

Any employee has a statutory right to request flexible working from the first day of their employment.

WHAT IS FLEXIBLE WORKING?

Flexible working may involve introducing changes in your hours of work, when you work or whether you work some or all of the time from home.

Unless specifically agreed otherwise, any change to your contract will be on a permanent basis and you will have the right to submit one additional Flexible Working Request in a 12-month period (unless any additional requests relate to a statutory entitlement, such as the Equality Act 2010 right to request reasonable Adjustments). It is therefore important that you consider very carefully what the effect of a change in your current contractual terms will mean to you. Any reduction in hours worked will result in a pro-rata reduction to salary.

Examples of flexible working:

- Part time
- Job sharing
- Term time only working
- Compressed working week
- Flexi-time
- Fixed hours
- Annualised hours
- Home and teleworking

HOW TO APPLY

All requests must be made in writing (letter or email) to HR, be dated and state if a previous application has been made by you to the Company and if so when.

Your request must:

- state that this is a request for flexible working under section 80F of the Employment Rights Act 1996;
- explain what change in your current working arrangements you are seeking and when you wish it to come into effect;
- explain what effect you believe the change will have on the Company and how this effect can be dealt with;
- state whether this is a statutory or non-statutory request;
- state whether a previous application has been made by you;
- state the date of any previous applications made by you.

If your request is in relation to the Equality Act, e.g. as a reasonable adjustment relating to a disability, this should be made clear in your application.

CONSIDERATION OF YOUR APPLICATION

If we agree to your proposals immediately we will write to you to confirm this and the date when the change will come into effect.

If we believe that we need to discuss your proposals before a decision is made, a meeting will be arranged with you within 28 days of HR receiving your application. You can choose to be accompanied at that meeting by another worker employed by the Company.

Your chosen companion will have the opportunity to address the meeting on your behalf but may not answer questions for you.

If the date proposed for the meeting is inconvenient for either you or your chosen companion it is important that you contact HR so that alternative arrangements can be made. Any failure by you to attend a meeting arranged to consider your application, without good reason, your application will be deemed to have been withdrawn.

The Company will usually be represented at the meeting by your immediate Manager and HR.

The request may be granted in full, in part or refused. The Company may propose a modified version of the request, the request may be granted on a temporary basis, or you may be asked to try the flexible working arrangements for a trial period.

Within 14 days of the meeting we will write to you to explain the Company's response to your application. If we agree to your proposals we will notify you of when the contract change will take effect and confirm what the change agreed is.

TRIALLING NEW WORKING ARRANGEMENTS

Where there is some uncertainty about whether or the flexible working arrangement is practicable for an employee and / or the organisation, a trial period may be agreed. If a trial period is arranged, the Company will allow sufficient time for you and your Manager to implement and become used to the new working practices before taking any decisions on the viability of a new arrangement.

When a trial period has been arranged, the Company will provide you with a document that details your new working pattern, making clear that it is only a temporary variation to the terms of your contract. You will be informed in writing of the start and end dates of the trial period. The Company may reduce or lengthen the trial period where necessary, with your agreement). The Company reserves the right, at the end of the agreed trial period, to require you to revert to your previous working arrangement.

AGREEMENT TO THE FLEXIBLE WORKING REQUEST

Where the flexible working request is agreed as a permanent change, a variation will need to be made to your employment contract. A new contract, or note to amend the terms of your contract, will be sent to you within 28 days of the change to your working pattern being agreed.

IF YOUR APPLICATION IS TURNED DOWN

If we decide that we cannot agree to your request for flexible working when we write to you with our decision, we will explain why your proposal has been refused and explain the appeal procedure.

There are a number of reasons, set down by law, why we may decide that we have to refuse an application:

- because of the additional costs that the Company will incur;
- because the changes mean that we will be unable to meet customer demands or customer service will be adversely affected;
- because we will not be able to re-organise work amongst existing staff;
- because we will be unable to recruit additional staff;
- because the changes proposed will have a detrimental impact on performance or quality;
- because there will be insufficient work during the periods when you propose to work;
- because the proposed changes are impractical in light of planned structural changes within the Company.

In the event that we turn down your application we will explain which of the above issues exist in your case and why we believe this to be the case. We will also set out your right of appeal.

RIGHT TO APPEAL

If your application for flexible working is turned down you will have a right to appeal which must be exercised within 14 days of the date of our decision. Any appeal must be made in writing, set out the grounds and be dated.

We will arrange a meeting with you, and your chosen companion if appropriate, to determine your appeal within 14 days. Appeals will be determined by Management. Their decision will be notified in writing to you within 14 days of the appeal meeting.

FURTHER APPLICATIONS FOR FLEXIBLE WORKING

Once you have exhausted the procedure set out in this policy you may not make more than one additional application for flexible working for 12 months from the date of the previous application. Within any 12-month period you may make a maximum of two statutory requests for flexible working.

ABUSE OF THE FLEXIBLE WORKING POLICY

Any abuse of this flexible working policy will be regarded as a disciplinary matter and may result in disciplinary action up to and including dismissal in appropriate circumstances. If the Company has grounds to believe that the policy is being abused, the Company may request proof of your eligibility under the policy.

5.7 GRIEVANCE PROCEDURE

PURPOSE

We recognise that it is important that colleagues feel comfortable in their employment relationship in the Company. In cases where it is not possible to resolve complaints or concerns informally, the grievance procedure can be used.

The following grievance policy has been developed to allow employees to communicate any complaints or issues they may have, so that they can be resolved swiftly and satisfactorily. Employees may raise a grievance relating to allegations of bullying or harassment under this procedure or under the Company's separate bullying and harassment policy.

The procedure is applicable to all employees. However, this procedure is not a term of your contract of employment and is subject to review from time to time.

Employees will be advised of any changes to the procedure by HR.

POLICY DETAILS

If you have a complaint or concern in relation to your employment, the Company encourages you to resolve the situation informally by raising the issue with your Manager or in the case of a Manager, the Senior Manager and in the case of a Senior Manager, a Director or HR.

If the issue cannot be resolved informally, or if the matter is so serious that you do not feel an informal approach is appropriate, you may instigate the formal grievance procedure.

You and the Company will be required to follow the statutory procedure outlined below:

Step 1: *statement of grievance*

- You should set out your grievance in writing and provide a copy of it to the Company.
- If your grievance is concerning your Manager you should put your grievance in writing to the relevant Director / HR. If the grievance is

about a Director you should put your grievance in writing to HR.

Step 2: *meeting*

- The Company will invite you to attend a meeting to discuss the grievance.

Note: The person to whom your grievance is addressed will arrange a meeting as soon as is practical. You will be entitled to be accompanied at this meeting, as set out below.

- The grievance meeting will not take place unless:
 - (a) You have informed the Company what the basis for the grievance is; and
 - (b) The Company has had a reasonable opportunity to consider its response to that information and conducting a grievance investigation if necessary.
- You must take all reasonable steps to attend the meeting.
- After the meeting, the Company will inform you of its decision/response to the grievance as soon as practicable and notify you of the right to appeal against the decision if you are not satisfied with it.

Step 3: *appeal*

- If you do wish to appeal, you must inform the Company in writing.
- If you inform the Company of your wish to appeal, the Company will invite you to attend a further meeting.
- You must take all reasonable steps to attend the meeting.
- After the appeal meeting, the Company will inform you of its final decision.

Note: A decision in writing will be given by the Company as soon as possible after the appeal meeting, ideally within five working days. If it is not possible to respond during this period, you will be advised of this and informed as to when a response will be provided.

This decision will be final and binding.

ADDITIONAL EXPLANATORY POINTS

If your grievance concerns your Manager, or if for some reason you do not believe that your Manager should be involved in the determination of the grievance, you should address your grievance instead to a Senior Manager.

The Company will ensure that each step and action under the procedure is taken without unreasonable delay.

The Company will ensure that the timing and location of meetings held are reasonable and that meetings are conducted in a manner that enables both the Company and you to explain their cases.

You will have the right to be accompanied by a work colleague or union representative at your grievance meeting if you wish. In the case of any informal discussion held between you and your Manager for the purpose of discussing a grievance, the right to be accompanied would not normally apply.

Your chosen representative/colleague will be allowed to put forward and sum up your case, confer with you and respond on your behalf to any views expressed at the meeting. Your companion cannot answer questions on your behalf.

You must take all reasonable steps to attend the grievance meeting. If your chosen companion is not available at the time or on the date set for the grievance meeting you may postpone the time or date to another reasonable time or date within 5 working days of the original meeting. It is your responsibility to provide the Company with a suitable alternative date for the rearranged meeting within these five working days.

The Company will allow an employee reasonable time off from their normal duties to act as your representative.

Your request for a companion must be a reasonable one. When choosing a companion it is important to bear in mind that it would not be reasonable to insist on being accompanied by a colleague where their presence would prejudice the hearing or they may have a conflict of interest.

If you have difficulty at any stage of the grievance procedure because of a disability, you should ask HR for assistance.

GRIEVANCES ABOUT DISCIPLINARY ACTION

This grievance procedure should not usually generally be used to complain about disciplinary action that we have taken against you. If you are dissatisfied with any disciplinary action, you should submit an appeal under the disciplinary procedure or capability procedure, as appropriate.

However, if you believe that disciplinary action has been or is being taken against you for a reason which does not relate to your conduct or capability, or for a reason which is discriminatory on grounds related to sex, sexual orientation, race, religion, age or disability, you should submit a grievance in writing to your immediate Manager and it will be dealt with as follows:

- if we receive your grievance before the disciplinary appeal hearing takes place, we may deal with your grievance at the appeal meeting; and
- in any other case, we will follow this grievance procedure.

5.8 ANTI-SLAVERY POLICY STATEMENT

INTRODUCTION

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced or compulsory labour and human trafficking, all of which deprive a person of their liberty, to exploit them for personal or commercial gain.

Capital Maintenance Ltd has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business transactions and relationships. We implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring that there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same standard from all our contractors, suppliers, and business partners. As part of our contracting processes, we will include specific prohibitions in the coming year against the use of forced, compulsory or trafficked labour, or labour from anyone held in slavery or servitude, whether adults or children. We expect that our suppliers will hold their own suppliers to the same legal, ethical standard.

SCOPE

This policy applies to all persons working for Capital Maintenance Ltd 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.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

RESPONSIBILITIES

The Managing Director has overall responsibility for ensuring this policy complies with Capital Maintenance Ltd.'s legal and ethical obligations and that all employees, contractors/sub-contractors control comply with it.

The Health, Safety, Environment & Quality Manager, Gary Williamson, has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. He is assisted by the Health and Safety Administrator, James Boden.

The senior management teams and Team Managers are responsible for ensuring those reporting to them including junior members of staff and sub-contractors, understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

All members of staff are invited to comment on this policy if they feel it can be improved in any way. Comments and suggestions should be forwarded to the Health and Safety Manager.

COMPLIANCE

All members of staff who work at Capital Maintenance Ltd must ensure they read, understand, and comply with this policy and specifically the following compliance points.

- The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for Capital Maintenance Ltd or under our control.
- You are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your Team Manager, Contracts Manager or H&S Manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.
- You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your Team Manager or Contracts Manager and report it as soon as possible.
- You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive, and exploitative work practices in their own business and supply chains.
- If you are unsure about whether a particular act, the treatment of

workers more generally, or the working conditions within any tier of our supply chains constitutes any form of modern slavery, raise it with your Line Manager or Company Director.

- 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 because of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.
- 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 your Line Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the current employee handbook.
- This Modern (Anti) Slavery Policy and Statement is intended for all areas of our business.

COMMUNICATION & AWARENESS

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and updates will be provided through our Health & Safety meetings. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy including sub-contractors

5.9 COMPANY ISSUE MOBILE PHONE POLICY

PURPOSE

The purpose of this policy is to establish guidelines for the appropriate use of mobile phones and other mobile devices by employees at Capital Maintenance Ltd. The policy aims to ensure productivity, protect sensitive information, maintain a professional work environment, and promote safety.

SCOPE

This policy applies to all employees, contractors, and anyone granted access to Capital Maintenance Ltd's mobile devices and network.

THE DEVICE

The device issued is at the discretion of the business in line with the role that you are delivering in. There is consideration made in the decision taking into account the cost to the business and the increase in efficiency your role will have from having a company issue mobile device.

PERSONAL USE

Employees are permitted to use their personal mobile devices during designated break times and outside of working hours. However, during work hours, employees should prioritize work-related tasks and limit personal phone use to emergency situations only.

WORK-RELATED USE

Mobile phones provided by Capital Maintenance Ltd are to be used primarily for work-related purposes. Employees are expected to use their mobile devices responsibly and efficiently to enhance productivity and communication within the company.

CONFIDENTIALITY AND DATA SECURITY

Employees must exercise caution when using mobile devices to access or share sensitive company information. It is the responsibility of each employee to safeguard company data and promptly report any potential security breaches.

PROHIBITED ACTIVITIES

The following activities are strictly prohibited while using company-provided or personal mobile devices during work hours:

- Using mobile phones while operating machinery or performing tasks that require full attention.
- Accessing explicit or inappropriate content.
- Using mobile devices to harass, discriminate, or engage in any form of disrespectful communication.
- Engaging in personal business activities that are not related to work.
- Installing unauthorized software or apps on company-provided mobile devices.
- Violating any applicable laws or company policies.

MOBILE DEVICE MAINTENANCE

Employees are responsible for the proper care and maintenance of company-provided mobile devices. Any damage or malfunction should be reported to the IT department immediately.

LOST OR STOLEN DEVICES

In case of lost or stolen company-provided mobile devices, employees must report the incident to the IT department as soon as possible to mitigate potential security risks.

The IT department have a register of mobile phone assets and who they are assigned to. You will sign for your device when receiving it. It is the responsibility of the staff member to ensure that the IT team are made aware of any issues with their handset or service. It is the responsibility of the staff member to return their device to the business at the end of their employment term.

FINES OR COSTS

In the event a device is damaged or lost or stolen and needs to be replaced, any cost associated to the business will be passed on to the staff member. In the event

CONSEQUENCES OF POLICY VIOLATION

Failure to comply with this mobile phone policy may result in disciplinary actions, up to and including termination, depending on the severity and frequency of the violation.

ACKNOWLEDGEMENT

By using company-provided mobile devices or accessing the company network with personal devices, employees acknowledge their understanding and agreement to abide by the terms of this policy.

5.10 PRIVATE MEDICAL INSURANCE POLICY

DEFINITION

This policy is available to all employees who have successfully completed the probation period. The Group provides Single Person cover, although employees will need to pay the tax element (a P11D benefit).

All eligible employees who wish to join must inform a member of HR once their probation period has been successfully completed. Employees have the option to upgrade to Couple, Single Parent Family or Family Cover. Once HR is notified by the employee that they wish to join the private medical insurance they will then submit the employees' details to Vitality.

Once the application has been processed, the employee will be sent a Welcome Pack from vitality to their home address which will set out the terms of the insurance cover.

The cost over and above that of Single Person cover will be required to be paid by the employee. The cost will be deducted from the employee's net pay on a monthly basis whilst the remain employed and within the plan.

Upgrade Costs

Please speak to a member of either HR or Finance in order to ascertain the cost of upgrade.

Terms

Please refer to the Key Facts Policy Summary and in particular, please note the following Group options:

Key Terms	Per Person Per Plan Year
Excess (once per scheme year)	£100
Vitality Plus (Rewards Programme)	Included
Core Cover*	Included
Primary Care**	Included
Advanced Cancer Cover	Included
Out-patient Cover***	Up to £1,000
Therapies Cover	Full cover

***Core Cover includes:**

Full cover for eligible in-patient and day-patient treatment including hospital fees, consultants' fees and diagnostic tests; Full cover for out-patient surgical procedure; NHS Hospital Cash benefit - £250 each night to a maximum of £2000 and £125 each day to a maximum of £500; Childbirth Cash Benefit - £100 for each child; Rehabilitation in case of stroke or serious brain injury; Full cover for Home Nursing; Full cover for Private Ambulance; Lifestyle Surgery; Parent Accommodation; Pregnancy Complications in specified circumstances; Oral Surgery for specified procedure.

**** Primary Care includes:**

Video consultations with a Vitality GP and 24 hours telephone access through Vitality GP helpline; up to 2 face-to-face consultations with a private GP on Vitality's Private GP network for only £20 per consultation; up to £100 towards private prescriptions and minor diagnostic tests when issues/referred by a Vitality GP or private GP in our network.

***** Out-patient Cover includes:**

Full cover for in-network physiotherapy and out-patient MRI, CT and PET scans; up to the chosen limit (£1000) for consultant appointments and out-of-network physiotherapy.

OPTING OUT

Employees have the option of opting out of the plan at any time, provided one month's notice is given.

Employees with Existing Private Medical Cover - Vitality

If an employee already has cover with Vitality on a personal basis and has held this cover for at least 6 months, they may be able to transfer into the Group's scheme. Please liaise with a member of HR to discuss if this is an option for you.

Employees with Existing Private Medical Cover – Alternative Provider

If an employee already has cover with an alternative provider on a personal basis and has held the cover for at least 12 months, they may be able to transfer into the Group's scheme. The employee should contact their existing provider to confirm that they are able to do so. Where the employee is able to do so, they then will need to discuss with a member of HR.

TAXATION

The provision of Private Medical Insurance to employees is a taxable benefit reportable annually on a P11D. The effect of this on the employee is that the benefit will be subject to tax at the prevailing rate.

Example 1

Employee A is a basic rate tax payer (2022/23 currently 20%) and is aged between 16 and 29. The benefit of approximately £350 will be taxed at 20%, a cost to the employee of £70.

Example 2

Employee B is a higher rate tax payer (2022/23 currently 40%) and is aged between 16 and 29. The benefit of approximately £400 will be taxed at 40%, a cost to the employee of £160.

The tax payable under both examples will be collected over the course of the tax year by a reduction in the employee's tax code, equivalent to the value of the benefit.

UPGRADE COSTS

The additional cost of over and above that of Single Person cover is payable by the employee via a post-tax deduction.

The cost is taken out of your salary after PAYE and NIC have been deducted.

5.11 CHATGPT AND ANY ARTIFICIAL INTELIGENCE USAGE POLICY

ChatGPT is a generative AI language model developed by OpenAI, based on the GPT (Generative Pre-trained Transformer) architecture. It is a state-of-the-art language model that can generate human-like text based on the input it receives. A number of these services are expected to be launched from multiple well known and used services such as google, yahoo etc... over the coming next months and years.

These services use deep learning techniques to generate responses that are contextually relevant and grammatically correct. They can be used for a variety of natural language processing tasks, such as language translation, summarization, and conversation generation.

However, like all AI technologies, there are concerns about the ethical implications of ChatGPT's use, particularly in areas such as bias, privacy, and the potential for misuse. As such, responsible use of ChatGPT, along with appropriate regulation and oversight, is essential to ensure that it is used within the remit of what this Company allows.

There are a number of concerns which the Company has in respect of the potential dangers of communicating using ChatGPT or any similar platforms. It is therefore appropriate that the Company has a policy applicable to all its employees so that everyone is aware of the procedures to be used in respect of these services. Though all staff should in effect already be complying with the principles set out below:

1. The technology systems are the property of the Company and provided to staff for use in conducting company business. Therefore, the Company will treat all internet usage as the Companies messages. The Company has the capability (and reserves the absolute right) to access, review, audit, copy and delete any technology system or messages wherever it has good reason and to disclose them to any person (inside or outside the Company) as it sees fit. In particular, the Company may conduct random monitoring under this provision.
2. Requirements for AI-generated content:
 - Proofing: All AI-generated content must be proofread and checked for accuracy by a human before being published or shared. This includes checking for spelling errors, grammar mistakes, and factual inaccuracies.

- Editing: AI-generated content must be edited to ensure that it is well-written, coherent, and engaging and that it does not contain in any capacity wording that can be related to the Company, its clients, suppliers or staff.
 - Starting point, not the finished product: AI-generated content should be viewed as a starting point, not the finished product. While AI can provide a valuable tool for generating content, it cannot replace the creativity and critical thinking skills of the Companies staff members.
3. Do not share proprietary data on ChatGPT or any AI platform under any circumstances.

These AI services are designed to process and generate language based on the input they receive. While these are sophisticated tools that can provide helpful insights and responses, they do not handle sensitive information to the standard this Company has set.

- Since ChatGPT and AI platforms are digital tools that can potentially be accessed by others, it is not authorised to share proprietary and confidential information within them under any circumstances.
 - ChatGPT and AI platforms can be utilised for the purpose of common and generic enquiries related to the role of the individual staff member, but for no other reason.
 - Language translation, research and analysis and customer engagement are not to be used in any capacity on any ChatGPT or AI platforms.
 - In summary, all staff should exercise caution when using such platforms ChatGPT or any AI platform as doing so could pose a security risk and potentially compromise sensitive data.
4. The Company reserves the absolute right to block access to certain internet sites which it perceives to be necessary. The Company has software and systems in place that can monitor and record all internet usage. You should be aware that The Company's security systems are capable of recording (for each and every user) each world wide web site visit, and each interaction into and out of any of the Companies internal networks, and we reserve the right to do so at any time as is necessary for the Companies purposes.
5. The Company reserves the right to inspect any and all internet activity of the Company's computer resources in order to assure compliance with policy. The Company also reserve the right to monitor any and all ChatGPT or AI sites being accessed and the extent and frequency of use of the internet at any time, both inside and outside office hours to ensure that

- the system is not being abused and to protect the Company from potential damage or disrepute. No member of staff should have any expectation of privacy as to his or her usage of such ChatGPT or any other AI services.
6. The Company insists that staff refrain from using ChatGPT or any AI platform unless directly applicable to the individual task at hand for the role of the individual staff member. The Company will not accept as an excuse incorrect miss-use of ChatGPT or any AI platform as the employ not being aware of the contents of this policy. Miss-use of the above may result in disciplinary action being taken including dismissal.
 7. If you have cause to be away from your desk for any period and wish to avoid any risk of abuse of your terminal, you should always log out while absent. Otherwise, the Company must assume in the first instance that any material coming from or via your terminal was generated and / or passed on by you. For the same reason you should not reveal your log-on code to any unauthorised person. However, use of passwords or other security measures does not in any way diminish the Company's right to access materials on its system. Any password used by staff must be revealed to the Company when required and should be notified to HR on your leaving the Company. Any monies due to an employee on termination of employment may be withheld until any passwords used by that employee have been disclosed.
 8. Use of the Companies technology systems to copy and / or generate any documents, software or other Company related information is protected by the copyright laws. If you are intending to download or use information from Chat GPT or any AI platform you should highlight that this tool has been utilised or used as a resource tool in the completed piece of work or task at hand.

The misuse of ChatGPT or any AI platform on the Companies technology systems or platforms, deliberate or inadvertent, will be treated as a serious disciplinary matter. Please contact HR or your line manager if you have any questions about this policy.

5.12 COMPLAINTS POLICY

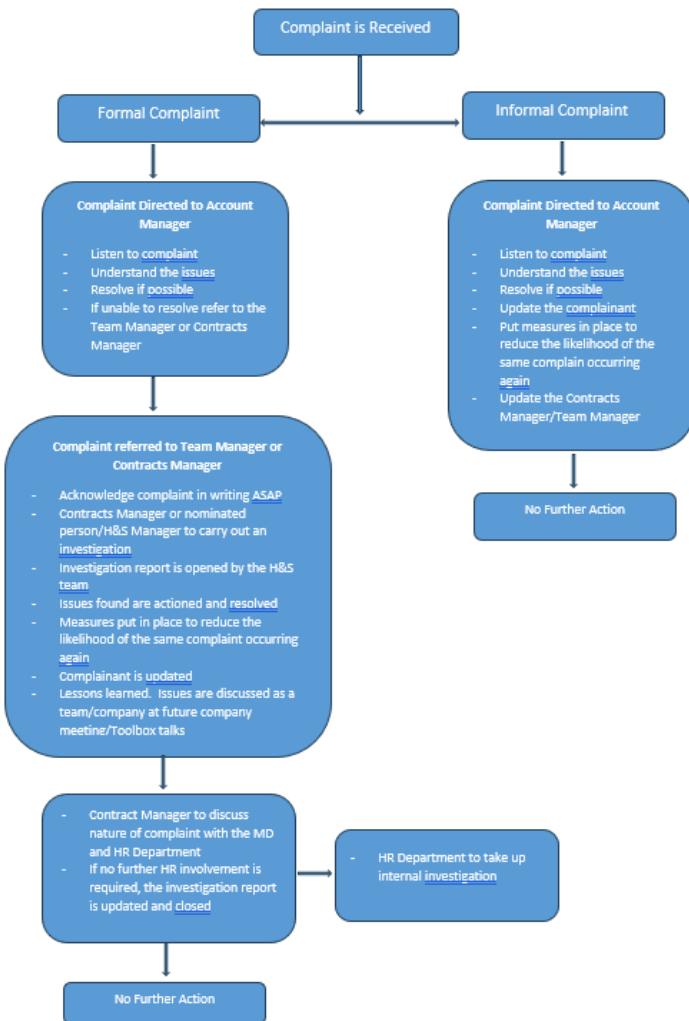
INTRODUCTION

Capital Maintenance Ltd is committed to providing a premium service to all of our customers and clients but we understand that from occasionally things may not go quite as we would like, and we may fail to match our own high standards resulting in a complaint.

It is our policy and at the heart of our business to take all complaints seriously whether they are customer and quality service focused or health and safety focused. We endeavour to use all best efforts to resolve them as effectively and efficiently as possible. Any person or organisation that makes a complaint will be treated with courtesy and respect.

All formal or serious complaints are acknowledged, logged, and monitored keeping the complainant updated through to a successful resolution. It is the policy of Capital Maintenance Ltd to learn lessons from our complaints and use them to improve our services all dealt with through internal meetings and toolbox talks.

The following flow chart details the process that Capital Maintenance follow once complaints come into the office. These may be via our clients directly, through a telephone call or in writing via email, all channels are acceptable and will be dealt with equally.



5.13 PRIVACY AND GDPR POLICY

INTRODUCTION

The Data Protection Act 2018 is the UK's implementation of GDPR (General Data Protection Regulation). Everyone responsible for using personal data must follow strict rules called 'data protection principles' and they must ensure that the information is used fairly, lawfully and transparently.

PURPOSE

The purpose of this policy is to establish an effective, accountable, and transparent framework for ensuring compliance with the requirements of GDPR.

SCOPE

This policy applies to all Capital Maintenance Ltd and all those working under its control (permanent and temporary employees, contractors, and workers). It applies to all processing of personal data as defined in the General Data Protection Regulation (GDPR) and to all processing of personal data contracted out to third parties.

POLICY STATEMENT

Capital Maintenance Ltd is committed to conducting its business in accordance with all applicable data protection laws and regulations in line with the highest standard of ethical conduct.

The use of the Internet pages of Capital Maintenance Ltd is possible without any indication of personal data; however, if a data subject wants to use special enterprise services via our website, processing of personal data could become necessary. If the processing of personal data is necessary and there is no statutory basis for such processing, we generally obtain consent from the data subject.

The processing of personal data, such as the name, address, e-mail address, or telephone number of a data subject shall always be in line with the General Data Protection Regulation (GDPR), and in accordance with the country-specific data protection regulations applicable to Capital Maintenance Ltd. By means of this data protection declaration, our enterprise would like to inform the general public of the nature, scope, and purpose of the personal data we collect, use

and process. Furthermore, data subjects are informed, by means of this data protection declaration, of the rights to which they are entitled.

As the controller, Capital Maintenance Ltd has implemented numerous technical and organisational measures to ensure the most complete protection of personal data processed through this website.

However, Internet-based data transmissions may in principle have security gaps, so absolute protection may not be guaranteed. For this reason, every data subject is free to transfer personal data to us via alternative means, e.g. by telephone.

DEFINITIONS

The data protection declaration of Capital Maintenance Ltd.'s is based on the terms used by the European Legislator for the adoption of the General Data Protection Regulation (GDPR). Our data protection declaration should be legible and understandable for the general public, as well as our customers and business partners. To ensure this, we would like to first explain the terminology used.

In this data protection declaration, we use, *inter alia*, the following terms:

PERSONAL DATA

Personal data means any information relating to an identified or identifiable natural person ("data subject"). An identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

DATA SUBJECT

Data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

PROCESSING

Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination

or otherwise making available, alignment or combination, restriction, erasure or destruction.

RESTRICTION OF PROCESSING

Restriction of processing is the marking of stored personal data with the aim of limiting their processing in the future.

PROFILING

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location, or movements.

PSEUDONYMISATION

Pseudonymisation is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

CONTROLLER OR CONTROLLER RESPONSIBLE FOR THE PROCESSING

Controller or controller responsible for the processing is the natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

PROCESSOR

Processor is a natural or legal person, public authority, agency, or other body which processes personal data on behalf of the controller.

RECIPIENT

Recipient is a natural or legal person, public authority, agency, or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

THIRD PARTY

Third party is a natural or legal person, public authority, agency, or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

CONSENT

Consent of the data subject is any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

GOVERNANCE

NAME AND ADDRESS OF THE CONTROLLER

Controller for the purposes of the General Data Protection Regulation (GDPR), other data protection laws applicable in Member states of the European Union and other provisions related to data protection is:

Capital Maintenance Ltd, First Floor Rear, 207 Regent Street, London W1B 4ND

NAME AND ADDRESS OF THE DATA PROTECTION OFFICER

Mr Scott Hunt

Capital Maintenance Ltd, First Floor Rear, 207 Regent Street, London W1B 4ND

Our Data Protection Officer may be contacted directly with all questions and suggestions concerning data protection.

COOKIES

The Internet pages of Capital Maintenance Ltd use cookies. Cookies are text files that are stored in a computer system via an Internet browser.

Many Internet sites and servers use cookies. Many cookies contain a so-called cookie ID. A cookie ID is a unique identifier of the cookie. It consists of a character string through which Internet pages and servers can be assigned to the specific Internet browser in which the cookie was stored. This allows visited Internet sites and servers to differentiate the individual browser of the data subject from other Internet browsers that contain other cookies. A specific Internet browser can be recognized and identified using the unique cookie ID.

Using cookies, Capital Maintenance Ltd can provide the users of this website with more user-friendly services that would not be possible without the cookie setting.

By means of a cookie, the information and offers on our website can be optimized with the user in mind. Cookies allow us, as previously mentioned, to recognize our website users. The purpose of this recognition is to make it easier for users to utilize our website. The website user that uses cookies, e.g. does not have to enter access data each time the website is accessed, because this is taken over by the website, and the cookie is thus stored on the user's computer system.

Another example is the cookie of a shopping cart in an online shop. The online store remembers the articles that a customer has placed in the virtual shopping cart via a cookie.

The data subject may, at any time, prevent the setting of cookies through our website by means of a corresponding setting of the Internet browser used, and may thus permanently deny the setting of cookies. Furthermore, already set cookies may be deleted at any time via an Internet browser or other software programs. This is possible in all popular Internet browsers. If the data subject deactivates the setting of cookies in the Internet browser used, not all functions of our website may be entirely usable.

DATA COLLECTION – GENERAL DATA AND INFORMATION

The website of Capital Maintenance Ltd collects a series of general data and information when a data subject or automated system calls up the website. This general data and information are stored in the server log files. Collected may

be (1) the browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (so-called referrers), (4) the sub-websites, (5) the date and time of access to the Internet site, (6) an Internet protocol address (IP address), (7) the Internet service provider of the accessing system, and (8) any other similar data and information that may be used in the event of attacks on our information technology systems.

When using these general data and information, Capital Maintenance Ltd does not draw any conclusions about the data subject. Rather, this information is needed to (1) deliver the content of our website correctly, (2) optimize the content of our website as well as its advertisement, (3) ensure the long-term viability of our information technology systems and website technology, and (4) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack. Therefore, Capital Maintenance Ltd analyses anonymously collected data and information statistically, with the aim of increasing the data protection and data security of our enterprise, and to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

REGISTRATION ON OUR WEBSITE

The data subject has the possibility to register on the website of the controller with the indication of personal data. Which personal data are transmitted to the controller is determined by the respective input mask used for the registration. The personal data entered by the data subject are collected and stored exclusively for internal use by the controller, and for his own purposes. The controller may request transfer to one or more processors (e.g. a parcel service) that also uses personal data for an internal purpose which is attributable to the controller.

By registering on the website of the controller, the IP address—assigned by the Internet service provider (ISP) and used by the data subject—date, and time of the registration are also stored. The storage of this data takes place against the background that this is the only way to prevent the misuse of our services, and, if necessary, to make it possible to investigate committed offenses.

Insofar, the storage of this data is necessary to secure the controller. This data is not passed on to third parties unless there is a statutory obligation to pass on the data, or if the transfer serves the aim of criminal prosecution.

The registration of the data subject, with the voluntary indication of personal data, is intended to enable the controller to offer the data subject contents or services that may only be offered to registered users due to the nature of the matter in question. Registered persons are free to change the personal data specified during the registration at any time, or to have them completely deleted from the data stock of the controller.

The data controller shall, at any time, provide information upon request to each data subject as to what personal data are stored about the data subject. In addition, the data controller shall correct or erase personal data at the request or indication of the data subject, insofar as there are no statutory storage obligations. A Data Protection Officer particularly designated in this data protection declaration, as well as the entirety of the controller's employees are available to the data subject in this respect as contact persons.

DATA USE - SUBSCRIPTION TO OUR NEWSLETTERS

On the website of Capital Maintenance Ltd, users are given the opportunity to subscribe to our enterprise's newsletter. The input mask used for this purpose determines what personal data are transmitted, as well as when the newsletter is ordered from the controller.

Capital Maintenance Ltd informs its customers and business partners regularly by means of a newsletter about enterprise offers. The enterprise's newsletter may only be received by the data subject if (1) the data subject has a valid e-mail address and (2) the data subject registers for the newsletter shipping. A confirmation e-mail will be sent to the e-mail address registered by a data subject for the first time for newsletter shipping, for legal reasons, in the double opt-in procedure. This confirmation e-mail is used to prove whether the owner of the e-mail address as the data subject is authorized to receive the newsletter.

During the registration for the newsletter, we also store the IP address of the computer system assigned by the Internet service provider (ISP) and used by the data subject at the time of the registration, as well as the date and time of the registration. The collection of this data is necessary in order to understand the (possible) misuse of the e-mail address of a data subject at a later date, and it therefore serves the aim of the legal protection of the controller.

The personal data collected as part of a registration for the newsletter will only be used to send our newsletter. In addition, subscribers to the newsletter may be informed by e-mail, as long as this is necessary for the operation of the newsletter service or a registration in question, as this could be the case in the

event of modifications to the newsletter offer, or in the event of a change in technical circumstances. There will be no transfer of personal data collected by the newsletter service to third parties. The subscription to our newsletter may be terminated by the data subject at any time. The consent to the storage of personal data, which the data subject has given for shipping the newsletter, may be revoked at any time. For the purpose of revocation of consent, a corresponding link is found in each newsletter. It is also possible to unsubscribe from the newsletter at any time directly on the website of the controller, or to communicate this to the controller in a different way.

CONTACT POSSIBILITY VIA THE WEBSITE

The website of Capital Maintenance Ltd contains information that enables a quick electronic contact to our enterprise, as well as direct communication with us, which also includes a general address of the so-called electronic mail (e-mail address). If a data subject contacts the controller by e-mail or via a contact form, the personal data transmitted by the data subject are automatically stored. Such personal data transmitted on a voluntary basis by a data subject to the data controller are stored for the purpose of processing or contacting the data subject. There is no transfer of this personal data to third parties.

ROUTINE ERASURE AND BLOCKING OF PERSONAL DATA

The data controller shall process and store the personal data of the data subject only for the period necessary to achieve the purpose of storage, or as far as this is granted by the European legislator or other legislators in laws or regulations to which the controller is subject to.

If the storage purpose is not applicable, or if a storage period prescribed by the European legislator or another competent legislator expires, the personal data are routinely blocked or erased in accordance with legal requirements.

RIGHTS OF THE DATA SUBJECT

Right of confirmation

Each data subject shall have the right granted by the European legislator to obtain from the controller the confirmation as to whether or not personal data concerning him or her are being processed. If a data subject wishes to avail himself of this right of confirmation, he or she may, at any time, contact our Data Protection Officer or another employee of the controller.

Right of access

Each data subject shall have the right granted by the European legislator to obtain from the controller free information about his or her personal data stored at any time and a copy of this information.

Furthermore, the European directives and regulations grant the data subject access to the following information:

The purposes of the processing; the categories of personal data concerned; the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations.

Where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period.

The existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing.

The existence of the right to lodge a complaint with a supervisory authority;

where the personal data are not collected from the data subject, any available information as to their source.

The existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject.

The data subject shall have a right to obtain information as to whether personal data are transferred to a third country or to an international organisation. Where this is the case, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer.

If a data subject wishes to avail himself of this right of access, he or she may at any time contact our Data Protection Officer or another employee of the controller.

Right to rectification

Each data subject shall have the right granted by the European legislator to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

If a data subject wishes to exercise this right to rectification, he or she may, at any time, contact our Data Protection Officer or another employee of the controller.

Right to erasure (Right to be forgotten)

Each data subject shall have the right granted by the European legislator to obtain from the controller the erasure of personal data concerning him or her without undue delay, and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies, as long as the processing is not necessary:

The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed. The data subject withdrawsthhrthtehjoisfdhoig9h9ufhggregreazgs ihfogconsent to which the processing is based according to point (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing.

The data subject objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR.

The personal data have been unlawfully processed.

The personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

The personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

The data subject withdraws consent to which the processing is based according to point (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing.

The data subject objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR.

The personal data have been unlawfully processed.

The personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

The personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

If one of the aforementioned reasons applies, and a data subject wishes to request the erasure of personal data stored by Capital Maintenance Ltd, he or she may at any time contact our Data Protection Officer or another employee of the controller. The Data Protection Officer of Capital Maintenance Ltd or another employee shall promptly ensure that the erasure request is complied with immediately.

Where the controller has made personal data public and is obliged pursuant to Article 17(1) to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform other controllers processing the personal data that the data subject has requested erasure by such controllers of any links to, or copy or replication of, those personal data, as far as processing is not required. The Data Protection Officer of Capital Maintenance Ltd or another employee will arrange the necessary measures in individual cases.

Right of restriction of processing

Each data subject shall have the right granted by the European legislator to obtain from the controller restriction of processing where one of the following applies:

The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data.

The processing is unlawful and the data subject opposes the erasure of the personal data and requests instead the restriction of their use instead.

The controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.

The data subject has objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

If one of the aforementioned conditions is met, and a data subject wishes to request the restriction of the processing of personal data stored by Capital Maintenance Ltd, he or she may at any time contact our Data Protection Officer or another employee of the controller. The Data Protection Officer of Capital Maintenance Ltd or another employee will arrange the restriction of the processing.

Right to data portability

Each data subject shall have the right granted by the European legislator, to receive the personal data concerning him or her, which was provided to a controller, in a structured, commonly used and machine-readable format. He or she shall have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, as long as the processing is based on consent pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Furthermore, in exercising his or her right to data portability pursuant to Article 20(1) of the GDPR, the data subject shall have the right to have personal data transmitted directly from one controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others.

In order to assert the right to data portability, the data subject may at any time contact the Data Protection Officer designated by Capital Maintenance Ltd or another employee.

Right to object

Each data subject shall have the right granted by the European legislator to object, on grounds relating to his or her particular situation, at any time, to processing of personal data concerning him or her, which is based on point (e) or (f) of Article 6(1) of the GDPR. This also applies to profiling based on these provisions.

Capital Maintenance Ltd shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.

If Capital Maintenance Ltd processes personal data for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing. This applies to profiling to the extent that it is related to such direct marketing. If the data subject objects to Capital Maintenance Ltd to the processing for direct marketing purposes, Capital Maintenance Ltd will no longer process the personal data for these purposes.

In addition, the data subject has the right, on grounds relating to his or her particular situation, to object to processing of personal data concerning him or her by Capital Maintenance Ltd for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1) of the GDPR, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

In order to exercise the right to object, the data subject may directly contact the Data Protection Officer of Capital Maintenance Ltd or another employee. In addition, the data subject is free in the context of the use of information society services, and notwithstanding Directive 2002/58/EC, to use his or her right to object by automated means using technical specifications.

Automated individual decision-making, including profiling

Each data subject shall have the right granted by the European legislator not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) is not authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or (3) is not based on the data subject's explicit consent.

If the decision (1) is necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) it is based on the data subject's explicit consent, Capital Maintenance Ltd shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part

of the controller, to express his or her point of view and contest the decision.

If the data subject wishes to exercise the rights concerning automated individual decision-making, he or she may at any time directly contact our Data Protection Officer of Capital Maintenance Ltd or another employee of the controller.

Right to withdraw data protection consent

Each data subject shall have the right granted by the European legislator to withdraw his or her consent to processing of his or her personal data at any time.

If the data subject wishes to exercise the right to withdraw the consent, he or she may at any time directly contact our Data Protection Officer of Capital Maintenance Ltd or another employee of the controller.

LEGAL BASIS FOR THE PROCESSING

Art. 6(1) lit. a GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as is the case, for example, when processing operations are necessary for the supply of goods or to provide any other service, the processing is based on Article 6(1) lit. b GDPR. The same applies to such processing operations which are necessary for carrying out pre-contractual measures, for example in the case of inquiries concerning our products or services. Is our company subject to a legal obligation by which processing of personal data is required, such as for the fulfilment of tax obligations, the processing is based on Art. 6(1) lit. c GDPR. In rare cases, the processing of personal data may be necessary to protect the vital interests of the data subject or of another natural person.

This would be the case, for example, if a visitor were injured in our company and his name, age, health insurance data or other vital information would have to be passed on to a doctor, hospital or other third party. Then the processing would be based on Art. 6(1) lit. d GDPR. Finally, processing operations could be based on Article 6(1) lit. f GDPR. This legal basis is used for processing operations which are not covered by any of the abovementioned legal grounds, if processing is necessary for the purposes of the legitimate interests pursued by our company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. Such processing operations are particularly permissible because they have been specifically mentioned by the European legislator. He considered that a legitimate interest could be assumed if the data

subject is a client of the controller (Recital 47 Sentence 2 GDPR).

THE LEGITIMATE INTERESTS PURSUED BY THE CONTROLLER OR BY A THIRD PARTY

Where the processing of personal data is based on Article 6(1) lit. f GDPR our legitimate interest is to carry out our business in favour of the well-being of all our employees and the shareholders.

PERIOD FOR WHICH THE PERSONAL DATA WILL BE STORED

The criteria used to determine the period of storage of personal data is the respective statutory retention period. After expiration of that period, the corresponding data is routinely deleted, as long as it is no longer necessary for the fulfilment of the contract or the initiation of a contract.

We clarify that the provision of personal data is partly required by law (e.g. tax regulations) or can also result from contractual provisions (e.g. information on the contractual partner).

Sometimes it may be necessary to conclude a contract that the data subject provides us with personal data, which must subsequently be processed by us. The data subject is, for example, obliged to provide us with personal data when our company signs a contract with him or her. The non-provision of the personal data would have the consequence that the contract with the data subject could not be concluded. Before personal data is provided by the data subject, the data subject must contact our Data Protection Officer. Our Data Protection Officer clarifies to the data subject whether the provision of the personal data is required by law or contract or is necessary for the conclusion of the contract, whether there is an obligation to provide the personal data and the consequences of non-provision of the personal data.

Roles and Responsibilities

The MD and the senior management team of Capital Maintenance Ltd will ensure that all employees responsible for the processing of personal data are aware of and comply with the contents of this policy. In addition, they will ensure that any third party engaged to process data on our behalf are also aware of and comply with this policy.

RECORDS MANAGEMENT AND REVIEW

The Health, Safety, Environment and Quality Manager, Gary Williamson, will ensure that all records relevant to administering this policy and procedure are kept for a minimum of 5 years. Any feedback and suggestions on this policy are welcome. It will be reviewed annually or in the event of any legislative changes or fundamental changes to Capital Maintenance Ltd.

5.14 RIGHT TO WORK / ILLEGAL WORKING POLICY

INTRODUCTION

Illegal working creates significant challenges for both businesses and the wider economy, and all employers are expected to comply with the rules set out by the Home Office in order to ensure that only those with a lawful right to work in the UK are employed.

It is therefore a requirement for employers to undertake right to work (RTW) checks before a worker, voluntary worker or an employee undertakes any paid or unpaid work. Capital Maintenance Ltd takes this responsibility extremely seriously and we understand the obligation to comply with the prevention of illegal working legislation.

SCOPE

The MD and the Senior Management team including Human Resources who are responsible for the employment of new staff will continually familiarise themselves with the UK's Code of Prevention of Illegal Working and the Right to Work. This includes ensuring the procedures set out below are followed before any offer of employment is made.

Our HR team will ensure they are familiar with current day legislation regarding right to work checks and the Managing Director, will provide all necessary and required training to ensure this is delivered successfully. Capital Maintenance Ltd are aware of the potential fines associated with any breaches of these codes.

PROVISION OF WORK

We ensure compliance with sections 15 to 20 of The Immigration, Asylum & Nationality Act 2006. No person will be able to start work until a successful screening has taken place.

BRITISH CITIZENS

- Meeting an individual face to face checking and verifying a physical copy of their acceptable documentation such as passport/birth certificate and NI information. The document is scanned, signed, dated, and certified as a true copy of the original. It is then uploaded onto our Safe HR database, which provides prompts when ID becomes out of date.

NON-BRITISH CITIZENS

- Meeting an individual face to face checking and verifying a physical copy of their acceptable documentation such as passport/birth certificate and NI information. The document is scanned, signed, dated, and certified as a true copy of the original. It is then uploaded onto our Safe HR database, which provides prompts when ID becomes out of date.
- Provision of a proof of right to work. This can be a BRP or any other residence permit for the UK that proves an individual's right to work and stay in the UK. This is scanned and added as above. The expiry date is noted, and the employee is required to provide a new proof of right to work before the expiry of the current one.
- Online right to work check codes are requested on our new starter forms and a file containing the complete check is added and filed as above. The expiry date is also noted, and the employee is required to provide a new right to work before the expiry of the current one.

EMPLOYMENT REFERENCES

Employment references are requested from new starters, and all offers of employment are conditional upon receipt of satisfactory references from two separate employers (if applicable and where possible). One of these referees must have directly supervised the candidate within, at least, the preceding year of employment.

Employment reference requests are sent via email and the referee is requested to provide a short-written reference in respect of the persons employment with them. They are requested to provide information regarding the position held and the dates of employment. Once a reference is received it is cross checked with the individuals CV (also stored in their files and Safe HR). Any discrepancies are questioned. References are sent to the individuals line managers for confirmation if they are satisfactory.

We will retain all copies of documentation for the entirety of the persons employment with us (in line with current GDPR rules).

This right to work/illegal working policy will be regularly reviewed and updated as necessary.

5.15 HYBRID WORKING POLICY

Policy Statement:

This policy sets out the Company's hybrid working policy, which allows employees to divide their time between attending the office at the Companies Premises at 207 Regent Street, 1st Floor Rear, London W1B 4ND and working remotely. Capital Maintenance Ltd is committed to flexibility with the aim to meet both our company and our employee needs. Hybrid Working allows the company to reduce office costs whilst allowing employees to reduce their travel time and cost. Although

hybrid working is categorised as a type of flexible working, employees should not assume other aspects of flexible working, such as amended hours apply to hybrid working arrangement, unless contractually specified.

The hybrid working scheme under this policy is subject to ongoing monitoring and evaluation, to ensure that it continues to work effectively both in the interests of the Company and the employee.

Definition:

Hybrid workers are employees who, in part, and with the agreement of the Company, split their time between home or remote working and attending the office for the purpose of carrying out their job duties.

This policy will cover the following types of homeworking:

- Homeworking with time split between the home and office

Application and Eligibility:

The hybrid working scheme applies to all employees who meet the Stated Criteria set out in this policy below:

Employees who have successfully passed their probation period in the following departments/roles only:

- Senior Management Roles
- Account/Compliance/Project Managers and Coordinators
- Administrative and Finance Roles

Hybrid working is not currently suitable for the following roles/within the following teams:

- Estimators
- Technical Service Managers
- Fire Door Assessors, Inspectors and Estimators
- Engineers & Lead Engineers
(due to the nature of the above roles requiring the employees to attend various sites, and being part office based and part site/mobile based)
- Store and Asset Managers
(due to the nature of the above role requiring employees to be present in the office and present at the company reception)

This policy does not apply to remote or home workers who are already working remotely as a permanent variation to their contract of employment. The scope of the scheme has been determined in accordance with business needs and requirements.

While working remotely or home working, employees are not permitted to work outside the UK unless this is expressly agreed with the Company in advance.

Split between attending work and working remotely:

Employees working under this policy are able to spend a maximum of one day per week working remotely. Remote working will only be available on Tuesdays, Wednesdays and Thursdays. This applies to all employees working under this policy, excluding Department Heads. Employees working under this policy will attend the office for the remainder of their contracted working days.

Employees will not be able to choose which day they are able to work from home. The day of the week that employees will be able to work from home will be chosen and confirmed to them by the head of their department.

Senior employees can choose their own working from home day as long as this is approved by the head of their department and does not affect the day to day running of the business.

The remote working day will be set for the remainder of the year and any requests to change the remote working day will need to be approved by the head of the department. Changes to the set remote working day must be requested in writing with 48 hours' notice given.

Hybrid working must be requested in writing and addressed to the head of the employee's department and HR representative.

Recognising individual circumstances

The Company recognises the benefits of being flexible and recognises that employees' individual circumstances may differ. This may include where employees have challenges with their working environment at home that mean that remote working is difficult for them, and they would like to attend the office more often than set out in this policy.

Employees should speak to their line manager if they think they would benefit from departing from the requirement to spend the amount of working time at the office as set out in this policy. The Company's agreement is required to depart from the split between attending work and working remotely as set out in this policy. Depending on the degree of additional flexibility employees are seeking, the Company may ask the employee to make a formal flexible working request in accordance with the Company's Flexible Working Policy.

Flexible Working

All employees with the Company retain the right to make a formal request for flexible working, whether or not hybrid working is available for them. A request to work flexibly includes a request to alter working hours, days, or the office as a variation of contract.

For hybrid working to be effective it must fit into the company's business case model, which assess the following specifics to see if hybrid working is feasible:

To Consider	Factors to help decide
Is the role suitable for Hybrid working?	<ul style="list-style-type: none">• Can the job be done away from the office as well as in the office?• Is it a computer / phone-based function? -is travel involved in the employee's job function?• Does this reduce environmental impact and cost to the company?
Is the jobholder eligible?	As outlined in the stated criteria above.
Is the jobholder suitable?	<ul style="list-style-type: none">• Is the person self-motivated?• Is the person disciplined?• Does the person have the ability to work without direct <u>supervision</u>?• Can he/she work to complete a deadline?

Is the home suitable?	Hybrid workers need a safe and reasonable space, security, and privacy in which to work. For office type tasks employees need an internet connection able to support work systems.
Will hybrid working be beneficial?	Any arrangement should meet business needs and employee's needs, so it is favourable for both.

The Company reserves the right to amend the Stated Criteria at any stage as the operational needs of the business dictate.

Hybrid Working Agreement:

The following provisions will apply in respect of periods when the employee is working remotely under this policy:

Health and Safety Risk Assessment

The Company has a duty of care to its employees, the employee or the employer must carry out risk assessments before homeworking can be approved. If the risk assessment identifies concerns, then the employee (if they have requested hybrid working) is responsible for changes to the home to bring up to standard. The timescale of changes would be agreed between the Company and the employee. If concerns are not address and homeworking was requested by the employee, the Company has the right to refuse.

Employee Set Up

In order to enable the hybrid worker to work from home, the company may provide the hybrid worker with designated items of office equipment. The employee is expected to pay for electricity, water, heating, telephone, broadband and other utilities. Employer costs can be claimed through the expense claim system or company credit card. Company purchased equipment belongs to the company, when it is no longer needed the company will be responsible for the cost and arrangement of collection.

Company Access to Home

The company would require access to the employees home rarely but may require access for the following activities:

- Initial set-up
- Maintenance of Equipment

- Health and Safety Assessment
- Electrical Equipment testing

Moving House

If the employee moves whilst homeworking it is their responsibility to move and reinstall all suitable equipment to continue with their homeworking

Managing the Hybrid worker

Hybrid working employees will be managed the same way “on-site” or “office” based employees are. This includes opportunities for training, development and promotion as well as falling under the company disciplinary policy and procedure.

Hybrid workers need to ensure they are honouring and working to company policies, which include (but not exclusive):

- Health and Safety Policy
- Code of Conduct
- Disciplinary Procedure

Hybrid workers must also be aware of their obligation to attend meetings, continue to engage in effective communication and team working.

Hybrid workers are responsible for meeting their contractual hours, these times should remain consistent with what they were when operating from an office. Should you need clarification about your working hours then please speak to the Managing Director or your direct Superior.

Should the hybrid workers line manager be concerned that the home is no longer a suitable location for the employee or has doubts about their ability to work effectively and as required at home, they will set up a review meeting to discuss further options.

All hybrid workers should be aware that it is to the sole discretion of the company to ask employees back to work from a company office where and when required.

Security of Information and Data Protection

The Company expects all company information to be held securely and all employees to abide by Data Protection laws, in particular to employee data and

financial information. It is the duty of the employee to ensure information kept at home is stored safely. All company paperwork which is not directly relevant to day-to-day workings, and which contain financial or personal information should be sent to the head office and or shredded.

Company Equipment

In order to enable the hybrid worker to work from home, the Company may provide them with designated items of office equipment. Office equipment may include computer hardware and software, laptop, any other item of office equipment. The employee agrees that they are responsible for ensuring the equipment is properly looked after and stored or otherwise kept safely and securely at all times. Failure to do so may result in hybrid working being withdrawn from the employee.

The Company reserves the right to require the employee to return the equipment at any time during their employment for any reason whatsoever, including, but not limited to, the termination of the hybrid working arrangement. In addition, on the termination of the employee's employment for any reason, they must promptly and without unreasonable delay return the equipment and, in any event, this must take place by no later than any date specified at the time by the Company. Any item of office equipment must be returned in the same condition as it was provided, subject to reasonable wear and tear. If an item of office equipment is damaged whilst under the employee's control, reasonable wear and tear excepted, they will be required to pay to the Company the cost of repairing the damage. In certain circumstances, this may include the replacement cost of the office equipment if it cannot in the Company's reasonable opinion be repaired.

Any office equipment is provided for the employee's exclusive use in connection with their employment with the Company. This is particularly important with respect to computer equipment due to the risk of introducing computer viruses. Use of the office equipment for personal and private purposes or for any use other than for the Company's business is prohibited. If an employee is discovered using the equipment for personal or private purposes, this is a disciplinary matter, and it may also result in hybrid working being withdrawn. A deliberate, negligent or reckless failure to take proper care of an item of office equipment, resulting in it being lost, damaged or stolen, is also a disciplinary offence.

Termination of remote working arrangements

Following consultation with the employee, the Company reserves the right to terminate an employee's hybrid working arrangement under this policy at any time, with no notice given and effective immediately. This could happen because the employee is unable to maintain standards in accordance with the stated criteria or for business, technical or organisational reasons.

Where remote working arrangements under this policy are terminated, the employee's line manager is responsible for making arrangements for the employee to resume their job duties within the office.

5.16 COMPANY CREDIT CARD POLICY

INTRODUCTION

For better performance of your duties, the Company may provide certain employees with a Company Credit Card. This document outlines acceptable and unacceptable use of Company Credit Cards.

SCOPE

The person issued with and named on the Company Credit Card is solely responsible for its usage and purchases. The policy will be in effect as long as the employee is in possession of a company credit card.

SECURITY

The person issued with and named on the Company Credit Card is responsible for the security of the card and its details at all times. Under no circumstances should the card or its information be shared with unauthorised persons. If you share the card or its details with any other individual, whether inside or outside the Company, you will be personally liable for all transactions or charges incurred as a result of such sharing. The Company reserves the right to recover any losses or unauthorised expenses from any payment of wages which it may be due to make to you.

DAMAGED, LOST AND STOLEN CARDS

If you lose or damage the card, or if it is stolen whilst in your possession, you must report this to the Company immediately and you must also take all necessary steps to immediately report the loss or theft to the relevant credit card issuer. You must do this as a matter of urgency as soon as you notice the card is missing. If fraudulent charges are incurred on the lost or stolen card before it has been reported as lost or stolen, you will be personally liable for any sum that has to be paid out as a result and the Company reserves the right to deduct such sum from any payment of wages which it may be due to make to you. In the event of loss, theft or damage to the card, the Company will arrange for a replacement card to be issued.

RETURN OF COMPANY CREDIT CARDS

Company Credit Cards must be returned to the Company on demand, with or

without cause, or upon the termination of your employment (for whatever reason). The card must be returned to Capital Maintenance, 207 Regent Street, 1st Floor Rear, London W1B 4ND with all associated receipts.

ACCEPTABLE USAGE

Company Credit Cards must be used for business purposes only and in conjunction with the employees' job duties. Business related expenses include suppliers, equipment, machinery, travel expenses (as per the company's Expenses Policy).

All purchases made through a Company Credit Card must align with the companies Expenses Policy. Purchases up to £500 can be made with no prior approval needed. Any purchase above this amount must be approved by the Managing Director.

PROVISION OF RECEIPTS

Employees must provide original VAT receipts for any transaction made through a Company Credit Card (which include the date, time, and nature of the transaction). All receipts must be submitted through the relevant credit card form and/or via the relevant mobile application, as and when a transaction is made. All missing receipts must be accompanied with the appropriate written explanation.

UNACCEPTABLE USAGE

Any personal purchases on the company credit cards will be treated as a violation of this policy. The cost of the purchase(s) will be deducted from any future wages payable to the employee and be deducted in full, from the employees next payment or subsequent payments until the cost is fully repaid.

The company reserves the right to investigate any suspect purchases made on a company credit card and request a written explanation for them.

Violation of this policy may result in a formal investigation and disciplinary procedure which can result in disciplinary sanction and / or dismissal.

SECTION 6 - PAY

6.1 SALARY POLICY

Your salary is stated in your Contract of Employment and amended by subsequent notification emails or letters.

Your salary is paid monthly in arrears, at the rate of one-twelfth of annual salary each month. The payment covers the calendar month and is made on the 30th of each month. Payment is made via credit transfer to your bank or building society account. To avoid delays in the payment of your salary, it is important that you inform HR of any change in your account details at least two weeks before pay day. Individual pay slips showing all deductions and the net sum paid into your account are distributed on or before pay day (where possible). Any queries regarding your salary payment should be made to HR.

As your employer, the Company will make the necessary deductions from your salary and pass them on to the collection agencies. We can implement your tax code only on receipt of the appropriate notification from the Inland Revenue. Any queries regarding tax or other deductions should be directed to HR who will direct you to the appropriate department.

6.2 OVERTIME POLICY

INTRODUCTION

The purpose of this policy is intended to provide guidance to managers and employees on the operation of overtime to ensure that arrangements do not negatively impact either the employee or the Company.

There is no contractual entitlement to overtime working and all overtime must be authorized in advance.

SCOPE

This policy applies to all employees paid within the Building and Maintenance Sector and pay structure.

The policy does not apply to non-on-site working employees, for which separate guidance applies. Please refer to your contract.

GENERAL PRINCIPLES

- Overtime will be voluntary.
- Before overtime is undertaken, its extent must be agreed between the manager and the employee who will be doing the overtime. As part of this discussion, there will be an agreement regarding the mode of reimbursement, i.e. time off in lieu or overtime payment.
- While the duration of overtime will normally be agreed beforehand, it is recognised that, in certain circumstances, it is difficult to predict the exact length of overtime, e.g. in the Residences/Estates where, for example, an event may run over.
- Overtime is defined as hours worked more than the basic full-time weekly hours of work (40.00 hours per week) irrespective of the days worked. Where part time staff work more than their normal contracted hours but less than the full-time hours, the additional hours are payable at their standard rate of pay.
- When asking a member of staff to work overtime, the Working Time Regulations 1998 must be considered.
- Under the Working Time Regulations 1998, regulation 10, a worker is entitled to a rest period of 11 consecutive hours rest in each 24-hour period during which the individual works for the employer.
- The Working Time Regulations 1998 put a limit on the number of hours

that workers can work each week. The basic provisions of the Working Time Regulations state that employees are: Required to work an average of no more than 48 hours a week unless they specifically opt-out.

TIME OFF IN LIEU

Employees who have agreed to take time off in lieu will receive this at plain time irrespective of when the overtime is worked i.e. if an employee works one additional hour, they will be entitled to take one hour off in lieu.

PAYMENT OF OVERTIME

Compensation for paid overtime shall be as follows:

Monday – Friday: time and a half (once 40.00 (full time) hours have been worked).

- Employees entering their 6th and 7th day of continuous working will be paid at time and a half regardless of whether they are part time or have reached the 40.00-hour ceiling.
- If the employee works passed midnight, they will be paid double time for each hour they work passed 12am. Please note this does not apply where the work pattern spans more than one week (Monday – Sunday) or staff work a varied shift pattern spanning several weeks.
- Employees working on recognised Statutory Days (UK Bank Holiday's, 25th and 26th December and 1st January): will be paid double time unless agreed otherwise and prior to overtime commencing.
- There are certain cases where routine overtime is subject to a rota. Special arrangements can be made in these cases to incorporate specific compensation.

All overtime must be submitted to Accounts and your line manager via email with the exact hours you worked and the job reference number for approval, no later than 25th of each month. All overtime is paid monthly in arrears, at the agreed rate. The payment covers the calendar month and is made on the 30th of each month.

Any queries regarding your overtime payment should be made to Accounts / HR.

6.3 COMPANY BENEFITS POLICY

In addition to your remuneration, you will be entitled to the following employment benefits.:

Company's Bonus Scheme

You will be entitled to take part in the Company's bonus scheme, in line with the Company's pay grade structure for your job title, details of which will be provided to you by your manager. The payment of a bonus may depend on Key Performance Indicators as outlined for your job title to be met. The payment or otherwise of a bonus will be entirely at the Company's discretion and you have no contractual entitlement to receive a bonus at any time, regardless of whether bonuses have been paid to you or to others on previous occasions. Where a bonus is paid, the amount of the bonus shall also be at entirely at the Company's discretion

Private Medical Insurance

The Company will provide you with private medical insurance. The scheme is currently with Vitality and they will provide you with a copy of your policy schedule, the policy document and details of any excluded medical conditions that affect you. However, the Company reserves the right at any time and from time to time to terminate this cover and take out cover with another private medical insurance provider. Any new provider's scheme may not give equivalent or comparative cover as the current cover.

The Company also reserves the right to withdraw the cover at any time. In this case, you will be given one month's notice of the withdrawal of cover to enable you to make your own arrangements for private medical insurance cover at your own expense.

Private medical insurance is an insured benefit. This means that the benefits to which you may be entitled are strictly governed by the provider's insurance policy in force at the relevant time. The Company will not under any circumstances reimburse you or pay for any medical costs or charges that you incur where the provider refuses payment or reimbursement under the terms of the insurance policy. Entitlement to the Private Medical Insurance is subject to the satisfactory completion of your probationary period.

West End Club

Employees are also given access to the ‘West End Club App’ which provides employees with seasonal discounts and offers on many shops and restaurants. The Company reserves the right at any time and from time to time to terminate this app and take out a subscription with another provider.

Pension Scheme

The Company uses the National Employment Savings Trust (NEST) for pension provision and, in compliance with the employer pension duties under the Pensions Act 2008, you will be enrolled as an active member of this scheme (or such other registered pension scheme as may be established by the Company to replace the NEST scheme) from the start of your employment. You will be subject to the rules of the scheme as are in force from time to time and HM Revenue & Customs requirements. Full details of the NEST scheme, including conditions of eligibility and the rates of contributions, will be sent to you.

If it is the case (due to your age and/or earnings) that you are a non-eligible or entitled worker, you will not automatically be enrolled into the occupational pension scheme. However, your right to opt into a scheme will be provided to you, and if you opt in, at that time full details of the scheme, including the rules, conditions of eligibility and the rates of contributions and benefits, will be sent to you.

SECTION 7 - MISCELLANEOUS

7.1 COMMUNICATION WITH MEDIA

All communications or enquiries from the media must be referred to Management. No statement, comment or interview should be given to the press or media without express consent from Management.

7.2 WHISTLEBLOWING POLICY

INTRODUCTION

The Public Interest Disclosure Act 1998 (the “Whistleblowing” Act) came into force in 1999. Broadly, its objective is to provide protection from detriment or dismissal to workers whom, in good faith, “blow the whistle” on certain specified activities within their organisation. They include making disclosures about criminal offences, breaches of legal obligation, miscarriages of justice, health and safety dangers, environmental risks, or any “cover ups” relating to these matters.

SCOPE

This policy applies to all employees, contractors and sub-contractors, temporary employees, casual workers, and agency workers on behalf of Capital Maintenance Ltd. There is no minimum length of service required in order to raise a concern. This policy however does not form part of any employee’s contract of employment, and it may be amended at any time.

RESPONSIBILITIES

The Managing Director, has overall responsibility for approving this policy and the HR department, Alicja Krajewska, has responsibility for overseeing it day-to-day. She will monitor its effectiveness and report back to the MD if any concerns have been raised under the policy or if she feels amendments need to be made.

WHISTLEBLOWING

The Company encourages a free and open culture in its dealings between its employees and all people with whom it engages in business and legal relations. In particular, the Company recognises that effective and honest communication is essential to its success.

If you wish to discuss or raise an issue relating to the Company or any of its clients you should speak with your immediate Manager or HR, Alicja Krajewska. If appropriate, steps will be taken to ensure your working environment and / or working relationships are not prejudiced by your disclosure.

Any employee who has concern about malpractice within the workplace will not be punished or victimised for his / her disclosure of confidential information

provided that such disclosure is made in good faith and in accordance with the provision of the Whistleblowing Act. Any victimisation or harassment of the employee for having raised legitimate concerns will be dealt with as a disciplinary offence. Following receipt of a disclosure, an investigation will be carried out and every endeavour will be made to protect staff cited within the disclosure, as far as is reasonably practicable.

Whistleblowing in general is a report of information which an individual reasonably believes shows that one of the following has occurred.

- A criminal offence has been committed, is being committed or is likely to be committed.
- A person's health and safety is in danger.
- Damage to the environment.
- A miscarriage of justice.
- A failure to comply with a legal obligation.
- Covering up or concealing wrongdoing described in the points mentioned above.

The policy should not be used for complaints relating to your own personal circumstances.

MONITORING AND REVIEW

The MD and senior management of Capital Maintenance Ltd are committed to the implementation of this policy. It will be reviewed in 12 months or as a result of any changes in risk and/or legislation or new guidance/legal opinion being provided to Capital Maintenance Ltd.

7.3 ANTI-BRIBERY AND CORRUPTION POLICY

INTRODUCTION

The purpose of this policy is to set out the responsibilities of Capital Maintenance Ltd, and all employees and contractors/sub-contractors who work on our behalf, regarding how to handle potential bribes in the workplace and how to identify and essentially report a potential breach. By following our set procedures, we are intent on reducing and preferably eliminating any risk that corruption may carry on our business.

Capital Maintenance Ltd has a zero-tolerance position on bribery and corruption, and we are committed to the prevention, deterrence, and detection of any bribery within our workplace.

Our policy is in line with the Anti-Bribery Act of 2010 and its legislation which states it is illegal to offer, promise, give, request, agree, receive, or accept bribes. Bribery is a criminal offence.

SCOPE

This policy covers all personnel who work at Capital Maintenance Ltd including those who are contracted to work on our behalf whether on a permanent, temporary, or interim basis.

Within the company, the responsibility to control the risk of bribery resides at all levels of the organisation. Whilst the Managing Director, and the senior management team are committed to preventing bribery by persons associated with it, it is the responsibility of all employees at Capital Maintenance Ltd to control and be aware of the risk.

DEFINITION

A bribery is an inducement or reward offered, promised, or provided to gain personal, commercial, regulatory, or contractual advantage. There are four key offences under the Act.

- Bribery of another person
- Accepting a bribe
- Bribery a foreign official
- Failing to prevent bribery.

GUIDELINES

Bribery at Capital Maintenance is not tolerated. The following section sets out what is and what is not acceptable whilst working with us. It is based on four areas, namely:

- Gifts and hospitality
- Facilitation payments
- Political contributions
- Charitable contributions

GIFTS AND HOSPITALITY

Capital Maintenance Ltd accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage or as an explicit or implicit exchange for favours or benefits.
- It is not made with the suggestion that a return favour is expected.
- It is compliant with local law.
- It is given in the name of the company, not in the name of the individual.
- It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
- It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you) for any works carried out during the year or assisting with a large project upon completion.
- It is of an appropriate type and value and given at an appropriate time, accounting the reason for the gift.
- It is given/received openly and not in secret.
- It is not selectively given to a key, influential person with the clear intention of directly influencing them.
- It is not above a certain excessive value as pre-determined by the Managing Director. This is usually set at £100.00.
- Capital Maintenance Ltd do not generally work with government officials, political parties, or any representative of a political party, however, in the event that this may happen, an offer may not be given or accepted to any

of these parties.

- Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the Contracts Manager who will assess the circumstances. Capital Maintenance Ltd also recognises that the practice of giving and receiving business gifts varies between countries, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.

As a rule as part of this policy, it is required that any gifts given should always be disclosed to the Team Manager. This includes gifts from suppliers and third-party contractors as well as clients. The intention behind a gift being given and received should always be considered. If there is any uncertainty, the advice of the Team Manager must be sought.

FACILITATION PAYMENTS & KICKBACKS

- Capital Maintenance Ltd does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. Whilst Capital Maintenance do not generally work with officials, we do recognise that they tend to be made by low-level officials with the intention of securing or speeding up the performance of a certain duty or action.
- We do not allow kickbacks to be made or accepted. We recognize that kickbacks are typically made in exchange for a business favour or advantage.
- Despite our strict policy on facilitation payments and kickbacks, we understand that employees may face a situation where avoiding a facilitation payment or kickback may put their/their family's personal security at risk. Under these circumstances, the following steps must be taken:
 - Keep any amount to a minimum,
 - Ask for a receipt detailing the amount and reason for the payment,
 - Create a record concerning the payment,
 - Report the incident to your Team Manager.

POLITICAL CONTRIBUTIONS

Capital Maintenance Ltd will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

CHARITABLE CONTRIBUTIONS

- We accept (and indeed encourage) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and we agree to disclose all charitable contributions we make as a company or through an individual.
- Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.
- We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the compliance manager.

EMPLOYEE RESPONSIBILITIES

As an employee of Capital Maintenance Ltd you must ensure that you read, understand, and comply with the information contained within this policy and with any training or other anti-bribery and corruption information you are given.

All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify your Team Manager, Contracts Manager or Health and Safety Manager.

If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. The MD has the right to terminate a contractual relationship with any employee if they breach this anti-bribery policy.

How to Raise a Concern

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to Capital Maintenance Ltd, you are encouraged to raise your concerns soon as possible, at any stage. If you're uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to your Team Manager, Contracts Manager, H&S Manager or even the Managing Director.

What to do if you feel you are Victim of Bribery or Corruption

You must tell your compliance manager as soon as possible if you are: offered a bribe by anyone; if you are asked to make a bribe; if you suspect that you may be bribed; you have been asked to make a bribe in the near future; or if you have reason to believe that you are a victim of another corrupt activity.

Protection

Capital Maintenance Ltd understands that you may feel worried about potential repercussions if you refuse to accept or offer a bribe or if you report a concern relating to potential act(s) of bribery or corruption. It is our policy to support anyone who raises concerns in good faith even if investigation finds that they were mistaken.

We will ensure that no one suffers any detrimental treatment from refusing to accept or offer a bribe or other corrupt activities, or because they reported a concern relating to potential act(s) of bribery or corruption.

Detrimental treatment refers to dismissal, disciplinary action, treats, or unfavourable treatment in relation to the concern the individual raised.

If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform your line manager or the compliance manager immediately.

TRAINING AND COMMUNICATION

Capital Maintenance Ltd will provide training on this policy as part of the induction process for all new employees. Employees will also receive regular, relevant training on how to adhere to this policy and will be asked annually to formally accept that they will comply with this policy.

Our anti-bribery and corruption policy and zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, and any third parties at the outset of business relations, and as appropriate thereafter.

We will provide relevant anti-bribery and corruption training to employees whenever we feel their knowledge of, and ability to comply with the Bribery Act needs to be enhanced. As good practice, all businesses should provide their employees with antibribery training where there is a potential risk of facing bribery or corruption during work activities.

MONITORING AND REVIEW

Capital Maintenance Ltd will keep detailed and accurate financial records and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given and we understand that gifts and acts of hospitality are subject to managerial review.

Capital Maintenance Ltd.'s Compliance Manager is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness. Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.

Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the compliance manager.