
BUSINESS POLICY
& CORPORATE
STANDARDS

TD-POL-S-001

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ISSUE, REVIEW AND AMENDMENT

This document shall be made available through the Telecom Division (TD) intranet and issued to all employees through an internal memorandum.

The Policy and Standards within this document shall be reviewed formally as part of the requirement of Standard 10 Management Review to re-affirm its ability to meet business requirements and to ensure maintenance of conformity to the current requirements of ISO 9001, 14001 and 45001.

Where revisions are required, this document shall be re-issued, incorporating all previous revisions. A number shall identify issues and each issue shall cancel and replace all previous issues and revisions.

All revisions shall be notified to TD employees through an internal memorandum.

| Date | Revision | Reviewer |
|---------------|----------------------|--------------|
| 01 April 2020 | Document Formulation | Jonathan Mee |
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INTRODUCTION

We recognise that robust, sustainable business policies are critical to ensure we deliver what we promise and that the safety and health of everyone who works for us or is affected by our work is protected. We consider these policies vital to the success of our business.

Nothing that we do in Telecom Division is so important that we cannot take the time to do it safely.

Our goal is for no accidents and no harm to people and we are committed to the achievement of that goal.

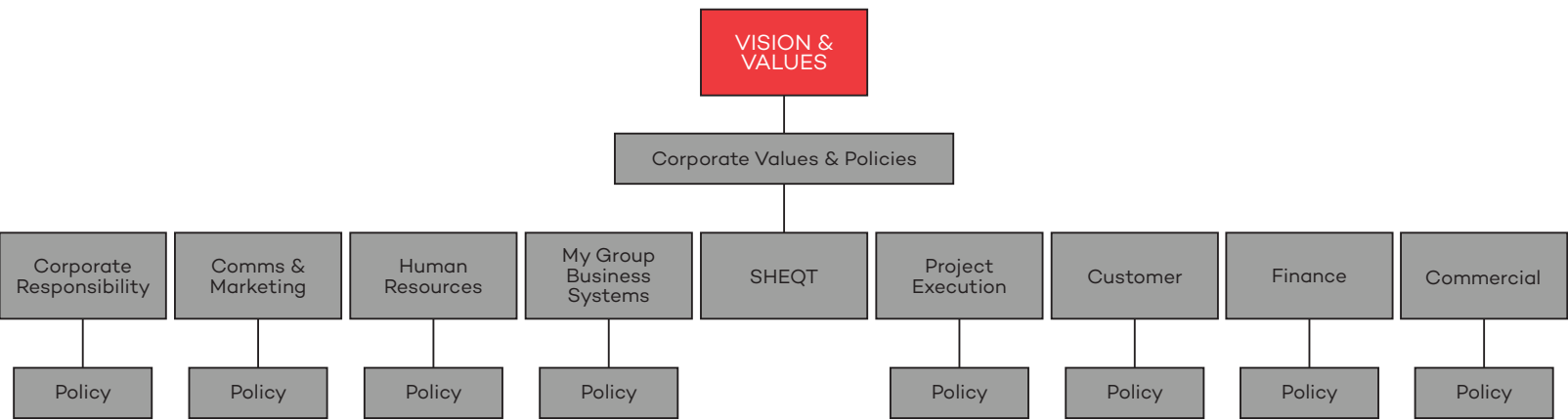
TD Business Management System (BMS) has been developed to help achieve the overall objectives of the business as outlined in our Vision and Values.

The scope of the BMS covers the company’s entire operations.

The purpose of this Policy and Standards is to establish, document, implement, maintain and continually improve the management system in accordance with the requirements of Company Policy, ISO 9001, ISO 14001 & ISO 45001.

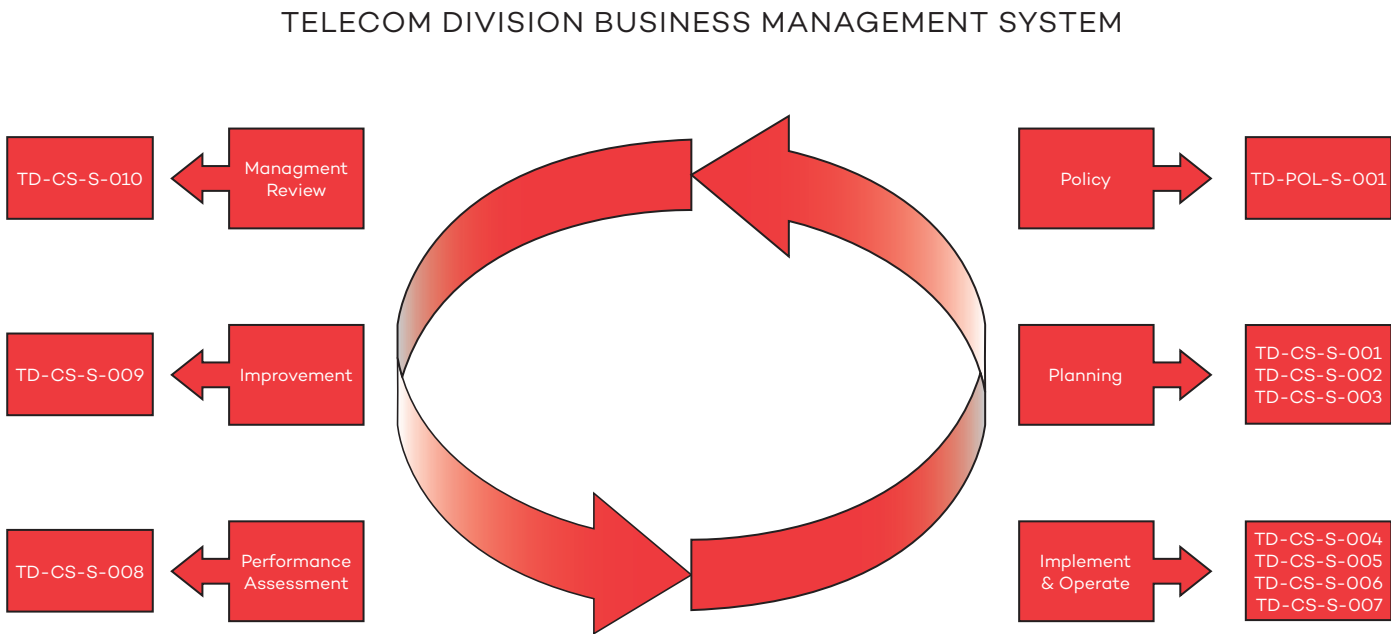
The Policy and Standards are applicable to all parts of Telecom Division and shall be reviewed annually or more frequently if necessary.

BMS Structure is figure 1 below:



Management System Structure - Figure 1

The Business Management System documentation to support the document structure above is as figure 2 below:



Business Management System - Figure 2

M GROUP SERVICES TELECOM DIVISION BUSINESS POLICY STATEMENT

The M Group Services Telecom Division is committed to providing a safe and sustainable service to its clients with a key focus on a 'First Time, Every Time, On Time' approach. This is aligned to being an employer of choice, providing a culture of personal development within a socially and economically responsible business.

The senior management team will implement and maintain the Business Policy such that it will provide safe and healthy working conditions and set objectives to continuously improve. It will commit to fulfil legal requirements, eliminate hazards and reduce risks, continually improve the Business Management System, consult with and encourage the participation of workers. The senior management team will ensure that the Business Management System conforms to the requirements of each standard and sets the strategic direction of the business.

The following core principles underpin our approach to achieving this commitment.

Safety

Nothing that the Telecom Division does is so important that we cannot take the time to do it safely. Our goal is an incident free environment and continued compliance with ISO 45001.

Health and Wellbeing

We will endeavour to provide a workplace that not only maintains but improves and enhances the physical, mental and social wellbeing of our employees and delivery partners.

Environment

We take account of our environmental responsibilities and endeavour to minimise our impact on the environment. The senior management team commits to identifying key impacts and implement appropriate measures to minimise these and prevent pollution. This is whilst maintaining compliance with ISO 14001, legal duties and any client specific requirements to support continual improvement of the environmental management system.

Quality

By measuring and improving how we operate, we will continue to provide a quality service to our clients, whilst maintaining compliance with ISO 9001.

We will securely manage information and improve our standards through ISO27001, ISO22301 and Cyber Essential Plus.

People

We are an employer of choice and embed equality within our culture. We empower our people and allow them to develop via structured career progression.

Delivery

Through openness, innovation and a culture of collaboration, we will underpin the business needs of our clients.

Integrity

We shall be open, honest, respectful and accountable for our actions. We are sensitive to the values and concerns of the wider society, our people, our clients and will conduct ourselves in an appropriate manner. The Business Policy is actively monitored, developed and will be formally reviewed annually, except where organisational developments or legislative changes dictate otherwise.

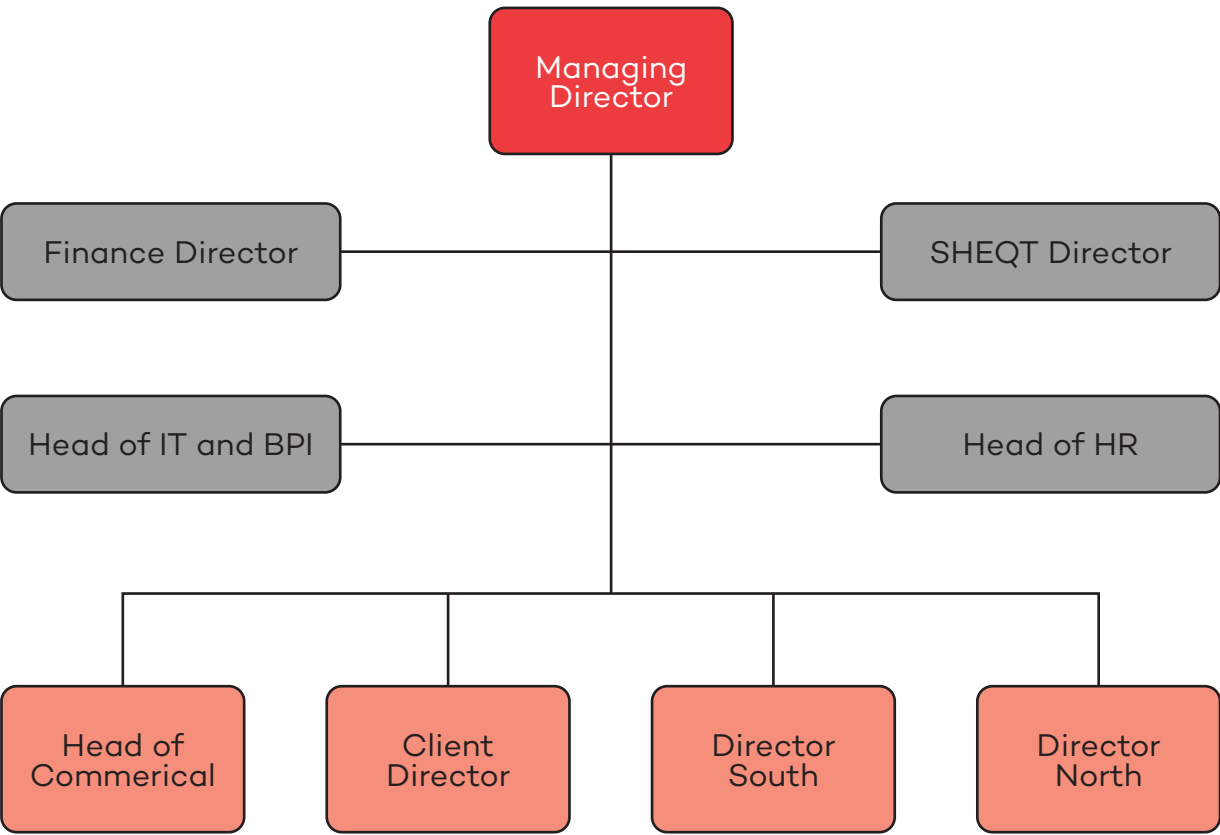
Alain Loosveld



Managing Director
01 April 2020

ORGANISATIONAL STRUCTURE

The organisational structure is as figure 3 below:



Organisational Structure - Figure 3

ROLES AND RESPONSIBILITIES

Managing Director M Group Services Telecom Division

The M Group Services Telecom Division Managing Director has ultimate responsibility for the BMS and has particular responsibilities for:

- a) The overall implementation of the Business Management Policy.
- b) Ensuring a documented system is in place to deliver the policy.
- c) Providing personal leadership in implementing the BMS Policy and to ensure that policies and procedures are adhered to.
- d) Establishing consultation and communication at all levels.
- e) Ensuring the BMS Policies are monitored, reviewed and audited.

Commercial Director

The Commercial Director reports to the Managing Director and is responsible for:

- a) Providing commercial support to the Directors.
- b) Focussing on key commercial issues arising during the contract period.
- c) Identifying and implementing commercial improvements as necessary.
- d) Profitability within their areas of responsibility.
- e) Sustainability.
- f) Subcontractor management.
- g) Ensuring that all personnel under their department are adequately qualified, trained and experienced for the tasks they are expected to perform.

Directors

The Director(s) report to the Managing Director of each business entity and hold responsibility for:

- a) Accepting a collective role in providing leadership.
- b) Ensuring Board decisions reflect the intentions of the Policy and the best interests of the organisation.
- c) Engaging the participation and support of employees.
- d) Supporting the allocation of sufficient and sustainable resources.
- e) Supporting the requirements of the BMS.
- f) Tenders.
- g) Sustainability.
- h) Customer satisfaction.
- i) Ensuring that all personnel are adequately qualified, trained and experienced for the tasks they are expected to perform.

Director of Safety, Health, Environment, Quality and Training (SHEQT)

The Director of Safety, Health, Environment, Quality and Training reports to the Managing Director M Group Services Telecom Division and is responsible for:

- a) Ensuring processes are in place to plan, deliver, monitor and review the BMS.
- b) Acting independently and represent the organisation on all matters pertinent to the BMS.
- c) Reporting to the Board on matters that are of strategic importance to allow the Board to make informed decisions on company strategy.
- d) Preparing objectives and targets for the Board to approve.
- e) Acting as lead with regards to the SHEQT consultation process from all personnel into the Board.
- f) Identifying and communicating to the Board, the culture and behavioural changes that may be required within the business to support the continual improvement process.
- g) Ensuring that all personnel are adequately qualified, trained and experienced for the tasks they are expected to perform.

Finance Director

The Finance Director reports to the Managing Director and the Chief Financial Officer of M Group Services and is responsible for ensuring that sufficient financial provision is available to support the BMS and the service(s) provided.

The Finance Director shall in addition:

- a) Prepare periodic financial statements.
- b) Adopt the role of Company Secretary as defined within the current Companies Act.
- c) Support the appointed external financial auditors.
- d) Prepare and document the organisation's annual report prior to submission to Companies House.
- e) Ensuring that all personnel are adequately qualified, trained and experienced for the tasks they are expected to perform.

Head of IT

The Head of IT reports to the Managing Director M Group Services Telecom Division and is responsible for:

- a) The IT strategy, infrastructure, systems, security and compliance to company, client, industry and legislative requirements.
- b) The support, development and improvement of business systems and processes.
- c) Leading innovation and research and development into new practices and ways of working.
- d) Delivery and performance of shared services through back-office core functions and administration.
- e) Ensuring that all personnel are adequately qualified, trained and experienced for the tasks they are expected to perform.

Head of Human Resources

The Head of Human Resources reports to the Managing Director M Group Services Telecom Division and is responsible for:

- a) The systems and processes that enable a just culture within the company.
- b) Employee performance measurement and development processes.
- c) Supporting employees on human resource matters that may arise.
- d) Adequate occupational health provision.
- e) An effective people strategy.
- f) Resourcing and recruitment.
- g) Ensuring that all personnel are adequately qualified, trained and experienced for the tasks they are expected to perform.

Managers

Managers are responsible for ensuring that the staff under their control comply with the current requirements of the BMS.

Managers shall:

- a) Ensure that all employees under their control are briefed on the BMS and all future changes.
- b) Issue and control all client supplied documentation.
- c) Ensure that processes are in place for the monitoring and review of the BMS across their area of responsibility.
- d) Escalate matters concerning the BMS to the appropriate Director.
- e) Provide adequate resources and competent staff.
- f) Only put to work trained, authorised and accredited employees in line with the BMS policies, procedures and processes.
- g) Monitor work activities via audits and inspections.

All Employees

All employees shall:

- a) Take responsibility for their duties in accordance with the BMS.
- b) Co-operate with all BMS policies and procedures.
- c) Escalate matters concerning the BMS to their Line Manager.
- d) Only undertake activities in which they are trained, competent, authorised and accredited.

Safety, Health, Environment, Quality and Training (SHEQT) Team

The SHEQT team reports to the Director of SHEQT and is responsible for undertaking the following:

- a) Briefing the line management on the requirements of the BMS and legislation.
- b) Monitoring and reviewing the BMS and site activities, via audits and inspections.
- c) Developing and coaching personnel in the use of the BMS.
- d) Providing training in line with business and client requirements.
- e) Escalating matters concerning the BMS to the Director of SHEQT.

STANDARD 1

PLANNING

1.1 Identification and Evaluation of Hazards, Risks and Opportunities

In order to ensure effective planning, it is first necessary to identify and evaluate all significant hazards and risks.

In order to achieve this, TD shall establish, implement and maintain procedures to identify any hazards arising from its activities. Suitable and sufficient control measures shall be implemented to mitigate the risk to as low as is reasonably practicable. This process will also be used to identify opportunities to improve the management system.

The following systems documentation ensures compliance with the above requirement:

TD-MOPs-S-001 Identification and Evaluation of Significant Hazards, Risks and Opportunities

1.2 Identification of Legal and Other Requirements

To determine legal and other requirements relating to activities and services provided in line with the BMS, a register of legislation and other requirements shall be documented, monitored and reviewed to ensure the company achieves continued compliance.

The following systems documentation ensures compliance with the above requirement:

TD-MOPs-S-002 Identification of Legal and Other Requirements.

TD-RG-S-001 Register of Health Safety and Environmental Legislation and other Requirements (via The Legislation Update Service).

1.3 Contingency Planning

Procedures for identifying and responding to any unplanned event, potential emergency or disaster shall be established, documented and maintained.

The aim of the procedure is to prevent or mitigate the consequences of any such occurrence.

The following systems documentation ensures compliance with the above requirement:

TD-MOPs-S-003 Emergency Planning.

TD-MOPs-S-010 Managing Non-Conformance.

STANDARD 2

OBJECTIVES

2.1 Objective Setting

Objectives shall be established, taking into account significant hazards, legal obligations, opportunities, other applicable requirements and commitment to continuous improvement.

2.2 Annual Programme of Objectives

The achievement of objectives shall be programmed on an annual basis, with the programme being documented and communicated to relevant people.

The following system documentation shall be utilised for ensuring compliance with the above requirement:

TD-MOPs-S-004 Management Review for Objective and Target Setting.

STANDARD 3

ORGANISATIONAL STRUCTURE, ROLES, RESPONSIBILITIES AND AUTHORITIES

3.1 Appointed Person

A specific management representative will be appointed, who, irrespective of other responsibilities, shall ensure processes are in place for the monitoring and review of the BMS.

The management representative shall report to the SHEQT Director on the performance of the BMS, including recommendations for improvement.

The following system documentation shall be utilised for ensuring compliance with the above requirement:

TD-POL-S-001 TD Business Policy and Corporate Standards

TD-MOPs-S-005 Roles and Responsibilities.

STANDARD 4

IMPLEMENTATION AND OPERATION

Procedures to identify hazards arising from business activities will be established, implemented and maintained. Suitable and sufficient control measures shall be implemented to mitigate the risk to as low as is reasonably practicable, meeting the company’s legal and other applicable requirements. The following system documentation shall be utilised for ensuring compliance with the above requirement:

- TD-MOPs-S-011** Contract SHEQ Plan Development.
- TD-MOPs-S-012** Implementation and Control.
- TD-RG-S-002** Information Register.

STANDARD 5

MANAGEMENT OF RESOURCES

All people working for or on behalf of the company will be competent on the basis of appropriate education, training, skills and experience for the tasks assigned to them.

- This will be supported by:
- Evaluating the effectiveness of the actions taken to ensure competence;
 - Ensuring that employees are aware of the relevance and importance of their activities and how they contribute to the achievement of the objectives.

The following system documentation shall be utilised for ensuring compliance with the above requirement:

- TD-MOPs-S-013** Management of Resources

STANDARD 6

DOCUMENTATION REQUIREMENTS

All documents to be formulated and implemented within the business as part of the BMS will be adequately controlled.

In order to achieve this, the company shall:

- Approve documents for adequacy prior to issue.
- Review, update and re-approve documents as necessary.
- Ensure that changes and current revision status of documents are identified.
- Ensure that relevant versions of applicable documents are available at points of use.
- Ensure that documents remain legible and readily identifiable.
- Ensure that documents of external origin are identified and their distribution controlled.
- Prevent the unintended use of obsolete documents, and to apply suitable identification to them if they are retained for any purpose.

Records will be established to document and maintain evidence of conformity to requirements.

The following system documentation shall be utilised for ensuring compliance with the above requirement:

- TD-MOPs-S-006** Document Control.

STANDARD 7

COMMUNICATION, PARTICIPATION AND CONSULTATION

Effective arrangements shall be established, implemented and maintained for:

- Internal communication amongst the various levels and functions of the company.
- Encouraging employee participation and consultation in systems review and development.
- Consulting with employees where changes to the BMS may affect them.
- Receiving, recording and responding to relevant communications from interested parties.
- Active communication, where appropriate, with external interested parties
- Establishing and implementing relevant controls for external communication.

| | |
|----------------------|---|
| TD-MOPs-S-008 | Internal and External Communication and Consultation. |
| TD-RG-S-002 | Information Register. |

STANDARD 8

PERFORMANCE ASSESSMENT

8.1 Monitoring and Measurement

Monitoring and measurement will be undertaken in order to determine the extent to which applicable requirements are being met. This shall include the recording of information to track performance of relevant operational controls and to evaluate conformance with the company objectives and the ability of the processes to achieve planned results.

The following system documentation shall be utilised for ensuring compliance with the above requirement:

| | |
|----------------------|---|
| TD-MOPs-S-004 | Management Review for Objective and Target Setting. |
| TD-MOPs-S-009 | Monitoring and Measuring Performance. |
| TD-RG-S-002 | Information Register. |

8.2 Evaluation of Compliance

Periodic evaluations of compliance with legal requirements will be undertaken that are relevant to the scope of the BMS with results recorded.

The following systems documentation shall be utilised for ensuring compliance with the above requirement:

| | |
|----------------------|---|
| TD-MOPs-S-002 | Identification of Legal and Other Requirements. |
| TD-MOPs-S-009 | Monitoring and Measuring Performance. |

8.3 Internal Audit

An audit programme shall be maintained to determine the effectiveness of the BMS.

The audit programme will ensure that:

- The BMS conforms to the ISO9001, ISO14001 and ISO 45001 standards.
- The BMS is being maintained and remains effective.

The following system documentation shall be utilised for ensuring compliance with the above requirement:

| | |
|----------------------|---------------------------------------|
| TD-MOPs-S-009 | Monitoring and Measuring Performance. |
|----------------------|---------------------------------------|

STANDARD 8

PERFORMANCE ASSESSMENT

8.4 Managing Non-Conformance

All non-conformities shall be recorded and monitored to ensure suitable and adequate close out.

The following system documentation shall be utilised for ensuring compliance with the above requirement:

| | |
|---------------------|--|
| TD-MOPs-S-10 | Managing Non-Conformance. |
| Standard 9.2 | Corrective, Preventive and Improvement Action. |

STANDARD 9

PERFORMANCE IMPROVEMENT

9.1 Company Requirements

The effectiveness of the BMS will be continuously evaluated through the use of audit results, analysis of data from performance assessment, corrective and preventive actions and management reviews.

The following systems documentation shall be utilised for ensuring compliance with the above requirement:

| | |
|----------------------|---|
| TD-MOPs-S-004 | Management Review for Objective and Target Setting. |
| TD-MOPs-S-007 | Corrective Preventive and Improvement Action. |

9.2 Corrective, Preventive and Improvement Action

Adequate arrangements will be maintained for dealing with corrective, preventive and improvement action, which shall include arrangements for:

- Reviewing non conformities.
- Determining the causes of non conformities.
- Evaluating the need for action to ensure that non conformities do not recur.
- Recording the results of action taken.
- Reviewing the effectiveness of the action taken.

The following system documentation shall be utilised for ensuring compliance with the above requirement:

| | |
|----------------------|---|
| TD-MOPs-S-007 | Corrective Preventive and Improvement Action. |
| TD-RG-S-002 | Information Register. |

STANDARD 10

MANAGEMENT REVIEW

The BMS shall be reviewed annually to ensure its continuing suitability, adequacy and effectiveness.

Reviews shall include assessing opportunities for improvement and the need for changes to the management system, including the policy and objectives.

Records of the management review shall be retained.

The review process shall include inputs and outputs as described below:

10.1 Process Inputs

The input to management review shall include, as a minimum, information on:

- Results of audits.
- Interested party feedback.
- Status of preventive and corrective actions.
- Review of objectives.
- Follow-up actions from previous management reviews.
- Changing circumstances, including developments in legal and other requirements related to the Division's hazards and associated risks.
- Recommendations for improvement data and information on the Division's performance.
- Results of the evaluation of compliance with legal and other requirements.

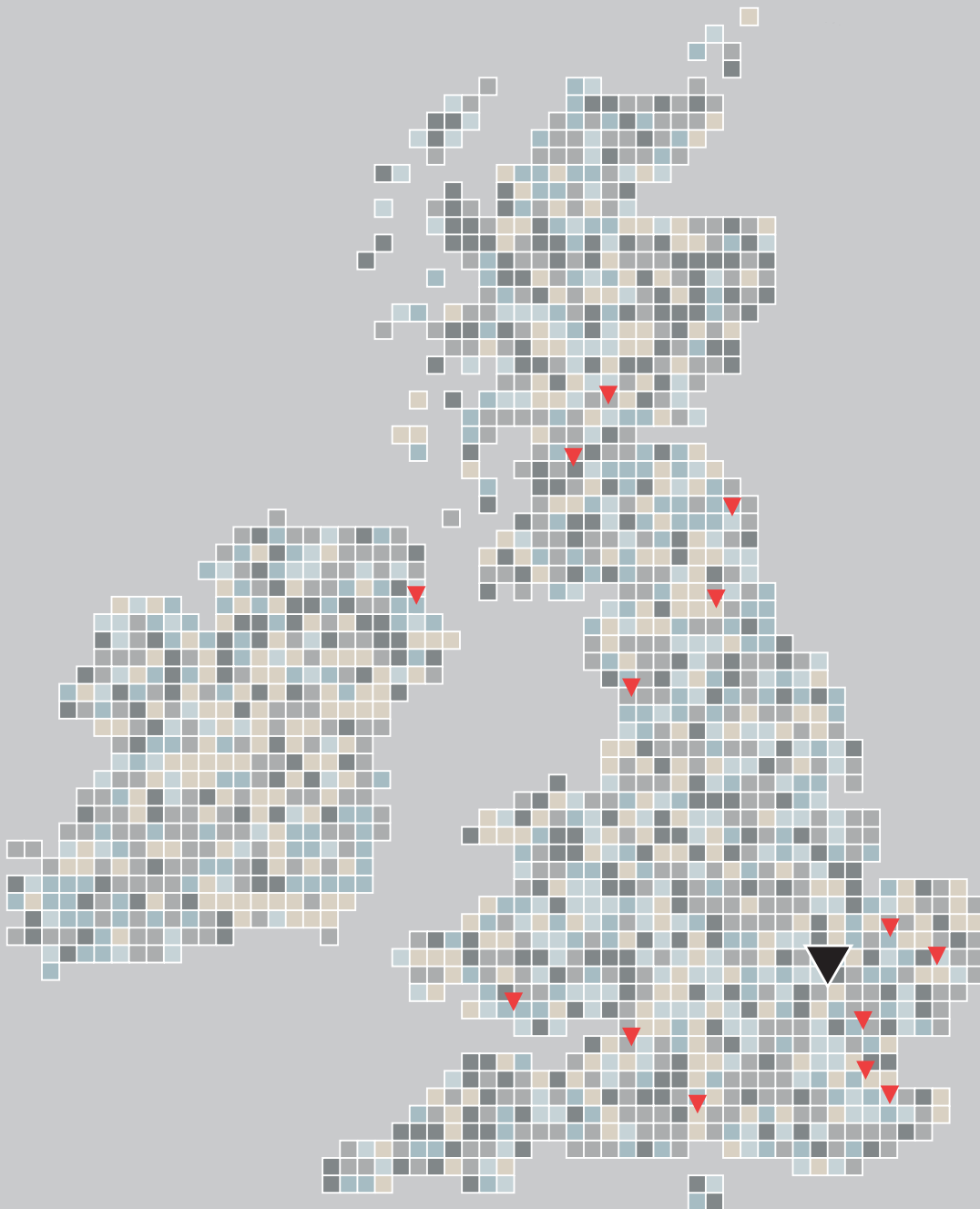
10.2 - Process Outputs

The output from the management review shall include any decisions and actions related to:

- Improvement of the effectiveness of the management system.
- Improvement related to interested party requirements.
- Resource needs to enable improvement of the BMS and its processes.

The following systems documentation shall be utilised for ensuring compliance with the above requirement:

| | |
|----------------------|--|
| TD-MOPs-S-004 | Management Review for Objective Setting and Programming. |
|----------------------|--|



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