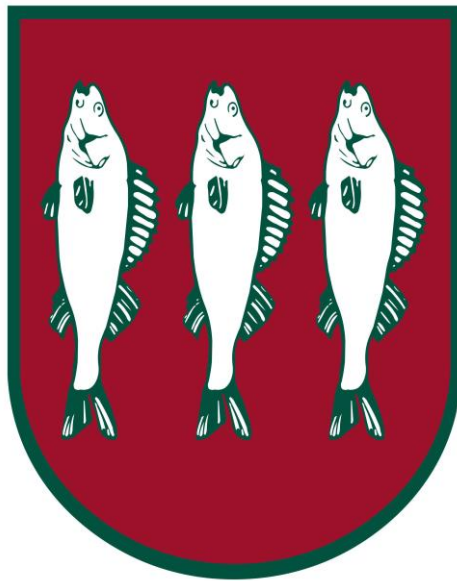


Galtec

Groundworks & Civil Engineers



GALTEC SERVICES LTD

STAFF HANDBOOK

Updated: January 2019

Welcome to Galtec.

Galtec was established in 1988 by Tony and Terry Galvin and continues to operate by the family values instilled by the brothers. Founded on long term relationships we have a reputation for delivering a quality product based on a fair and reliable service, and our staff are key to this success.

We believe in treating people with courtesy and respect, whether customers, suppliers, team colleagues or managers. This Handbook contains important information about what we expect from you as a member of the Galtec team and the support you will receive from the company to enable you to perform at your best.

The Board of Directors

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INTRODUCTION

This Staff Handbook sets out the policies and procedures that you will need to be aware of while working for Galtec. It applies to all our staff members whatever their working arrangement. You should familiarise yourself with the handbook and comply with it at all times.

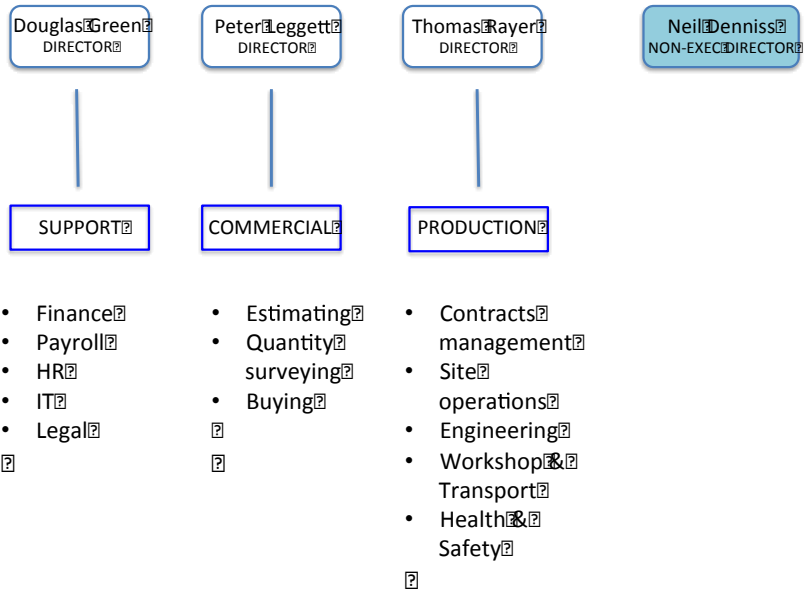
We seek to apply employment policies which are fair, equitable and consistent with applicable law and regulation as well as reflecting the needs of the business. We look to you for your support in implementing these policies.

From time to time it may be necessary for us to change some of the details contained in this Handbook to reflect changes in company policy or to comply with new legislation. We therefore reserve the right to vary the terms of the Handbook at any time, and will endeavour to give you one month's notice of any variation.

The contents of this Handbook do not form part of your contract of employment but you are required to comply with the provisions, rules and procedures set out within it. Where there is any difference between the terms and conditions set out in your contract of employment or other working agreement, and the contents of this Handbook, the terms and conditions in the contract of employment will prevail.

Although it is designed to answer many of your questions, please feel free to ask your manager about anything which remains unclear.

ORGANISATION STRUCTURE



1) CONDUCT

Galtec is a customer-led business and the conduct of its staff contributes significantly to its reputation. For this reason staff are required to be professional, polite and considerate to other staff members, customers and suppliers at all times as well as fully observing requirements regarding Health and Safety. If staff are unsure about the conduct required of them and/or any of the aspects outlined below they should seek clarification from their immediate supervisor or manager.

Dress Code

All staff are expected to maintain standards of appearance and dress that is professional and appropriate to their role, and that meet requirements of hygiene and health and safety. Guidance will be given on the specific dress standards required for the role held – this may include adherence to regulatory requirements. The Personal Protective Equipment (PPE) provided for those working on site and/or undertaking specific tasks **MUST** be worn at all times whilst working on site and/or undertaking the specific tasks. Site staff may be allowed to wear their own footwear subject to suitability and prior approval from their supervisor/line manager. PPE provided by the company that is subject to normal wear and tear will be replaced at the company's expense.

The dress code for staff working in office-based roles is 'smart casual'.

Punctuality

Staff are expected to be ready to commence work at the start of their shift or working hours – being suitably dressed (e.g. wearing PPE) and appropriately prepared to start work. Individuals should therefore allow sufficient time between arriving at company premises/site and the start of their allocated hours to get themselves ready. Persistent poor timekeeping, including being unprepared to commence work at the start of a working shift or following a contractual break, may lead to disciplinary action.

Smoking/Vaping

Smoking/vaping is only allowed in designated smoking areas – it is not allowed inside the office or within company vehicles. Smoking/vaping bans in force at sites and working locations must be observed.

Food & drink

Staff should treat facilities provided for eating respectfully and clear up after themselves. When in the office, care must be exercised when consuming food

and drink around desks and workspace areas. Staff on site should use site canteen facilities provided and have a responsibility for ensuring they clear up afterwards.

Staff and Company property

Staff should treat colleagues', company and customers' property with respect at all times including buildings, facilities (e.g. toilets) and vehicles. It is not permitted for company property, including plant and machinery, to be used in the course of any business or commercial activity other than that of the company. Operators are responsible for the upkeep of company plant they have been issued. This includes regular maintenance, reporting faults to the company workshop manager and reporting any damage to their manager. Shared plant and equipment is the responsibility of the site supervisor who will ensure that all the equipment is kept in good order; will report any faults or damage; and will ensure that whoever is using the plant or equipment carries out pre-use checks.

The company is not liable for damage or loss of employee's property whilst on the company's premises – this includes any tools or equipment which staff may have brought on site. All staff are responsible for their own personal belongings and should ensure that valuables are not left unattended. Staff on site should place valuables in the site office or a locked vehicle for security.

Right to search

Staff are required to agree, on request from any authorised person, to a search of their outer clothing, bag, vehicle, etc whilst they are on the company's premises or on site. Failure to give such permission may result in disciplinary action. However, it should be noted that such checks, in themselves, do not imply suspicion in relation to the individual concerned.

Telephone, Internet & Social Media

Company telephones, e-mail accounts and methods of accessing the internet should not generally be used for personal use, except on urgent matters. Unless required to do so for the performance of their duties, Galtec staff are strictly prohibited from using social media for business purposes e.g. for communicating with existing or potential customers. Mobile phones should not be used on site other than during employee's own time unless they are required to do so in the course of their duties e.g. site supervisor. Misuse or abuse of the company's telephones, e-mails or internet will be dealt with under Galtec's disciplinary policy.

Access & monitoring

Internet use may be monitored, including the use of third party sites, to ensure that staff are complying with the company policy. Galtec reserves the right to investigate the email or telephone activity of individual staff where there are reasonable grounds to believe that Galtec's policy has been breached, to protect the rights of other staff, or to investigate internal or external complaints. In addition, it may be necessary to access the e-mails of individual staff during their absence or in order to retrieve information.

Security CCTV cameras may be in operation at company premises and sites. Tracking devices may be installed in company vehicles for time sheet and location verification.

Drugs & alcohol

Staff are expected to be fit and capable whenever they present themselves for work. Alcohol consumption and the taking of illegal substances during the working day is forbidden. Employees who either arrive unfit for work or become unfit during the day will be taken home and may be subject to disciplinary action.

If there is significant evidence that a member of staff is taking illegal drugs or under the influence of alcohol, then the company has the right to carry out drugs and alcohol testing. Refusal of testing will be considered the same as failing the test and may result in disciplinary action. On some of our sites, the Principal Contractor has policies that include the carrying out of random drug and alcohol testing. If chosen, staff are required to agree to submit samples, as requested. Refusal, or failure of the test will result in the individual being removed from their site and may result in disciplinary action by the company.

Anti-bribery and corruption

The company prides itself on a reputation for acting honestly, fairly and ethically. Our reputation is built on a set of values and a commitment to acting with integrity. The company adopts a zero tolerance approach to bribery and corruption and will uphold all laws relevant to countering bribery and corruption - all forms of bribery and corruption are unacceptable. Any allegations of bribery will be treated as potential gross misconduct and dealt with under the company's Disciplinary policy.

2) PERSONNEL ISSUES: Policies and Procedures

Galtec is committed to creating an environment of equality, dignity and respect that promotes open communication and allows for free and informal discussions of any work related problems. This commitment extends to ensuring any issues are dealt with fairly, promptly and with sensitivity as reflected in the following policies.

EQUALITY AND DIVERSITY POLICY

It is the policy of Galtec to ensure equality of opportunity for all its staff. The values of the company require a positive environment in which all staff members are respected, are provided with development and progression opportunities, and can make the most of their abilities.

The company does not discriminate and will not tolerate discrimination against staff on the basis of their gender, sexual orientation, marital or civil partner status, gender reassignment, race, colour, nationality, ethnic or national origin, religion or belief, pregnancy or maternity, disability or age (together known as "Protected Characteristics"). Furthermore, Galtec will not tolerate discrimination by or against staff on the basis of an incorrect perception of a Protected Characteristic or association with a person who has a Protected Characteristic.

All staff 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. This duty also extends to the treatment of visitors, customers and suppliers by staff and the treatment of staff by these third parties.

The company's commitment to non-discrimination extends particularly, but not exclusively, to:

- Recruitment: Advertising, assessment and selection
- Training, development and promotion opportunities
- Terms and conditions of employment, benefits and pay
- Health & safety and conduct at work
- Grievance and disciplinary procedures
- Termination of employment including redundancy

To this end, the company will regularly review its policies and their application to ensure elimination of discrimination and compliance with relevant legislation. The company will also promptly and fully investigate all complaints of discrimination and harassment, taking appropriate action where necessary.

Any member of staff who believes they have been discriminated against is encouraged to raise the matter through the Grievance Procedure where it will be treated in confidence and investigated accordingly. Staff who make such

allegations in good faith will not be victimised or treated less favourably as a result. False or malicious allegations, however, will be dealt with under the Disciplinary Policy. Any member of staff who is found to have committed acts of discrimination will be subject to disciplinary action which if deemed to constitute gross misconduct may result in summary dismissal. Retaliation against a member of staff who complains of discrimination can be expected to lead to disciplinary action.

DISABILITY

A disability will not of itself justify the non-recruitment of an applicant for a position with the company. Such reasonable adjustments to the application procedures shall be made as are required to ensure that applicants are not disadvantaged because of their disability.

If a member of staff is disabled or becomes disabled, they are encouraged to tell the company about their condition so that they can be supported as appropriate. Every reasonable and practicable consideration will be given to ensure they can remain at work. This may include any reasonable adjustments to working conditions, premises or job duties that may be considered necessary, or which would assist in the performance of their duties, in which case further medical advice may be sought. Careful consideration will be given to any such proposals and they will be accommodated where possible and proportionate to the needs of the job. However there may be circumstances where it would not be possible to accommodate suggested amendments in which case the reasons for this decision will be fully explained. Where any adjustment has been made its operation may need to be reviewed at agreed intervals, to assess its continuing effectiveness.

DIGNITY AT WORK

Everyone who works for Galtec has the right to work in an environment that is free from harassment of any description, or any other form of unwanted behaviour – whether from colleagues, customers or other third parties. Harassment of any kind by members of staff is regarded as a disciplinary offence and in serious instances may lead to instant dismissal. Staff should also be aware that they may be held individually legally liable for harassing their colleagues or third parties (including customers) and could ultimately face criminal or civil prosecution. Every member of staff should consider whether their words or conduct could be offensive to others.

Staff that believe they have been subject to, or have witnessed harassment, victimisation or bullying (whether from colleagues or other parties) have access to avenues through which complaints can be raised. This policy applies to both the workplace and to external work-related settings such as business trips and social functions.

Harassment may take the form of unwanted conduct which is related to a relevant Protected Characteristic which is perceived as affecting an employee's

dignity at work. It may also take the form of unwanted conduct towards someone based on their appearance or other personal characteristics which is perceived as affecting their dignity at work. It is not only unwanted physical contact, assault or propositions; it includes suggestive remarks or gestures, pin-ups, graffiti, offensive comments, jokes and banter. Harassment may include bullying, intimidatory behaviour, persistent teasing or constant unfounded criticism of the performance of work tasks, unfair allocation of work and responsibilities, or exclusion from normal work place conversation. It may be directed towards one individual or a group. A single incident can amount to harassment if sufficiently grave.

Bullying is offensive, intimidating, malicious or insulting behaviour which, through the abuse of power, makes the recipient feel vulnerable, upset, humiliated and threatened. Bullying is often a form of harassment and, as with harassment, can take the form of physical, verbal and non-verbal conduct. Legitimate and constructive criticism of a worker's performance or behaviour or reasonable requests made of workers in the course of their employment will not constitute bullying.

Harassment and bullying do not simply depend on the intention of the offender, but rather, the impact of their behaviour on others. What one individual may be able to accept may nevertheless cause distress to another. What are important therefore are the perceptions and feelings of the injured person(s).

INFORMAL PROCEDURE

A member of staff who considers that they have been the recipient of unwanted conduct amounting to harassment or bullying is encouraged to try to resolve the problem informally with the other person, either face to face or in writing; making clear that their behaviour is unacceptable and unwelcome. Managers will provide support in the resolution of any problems. Anyone witnessing harassment or bullying should offer support to the victim by encouraging them not to ignore the behaviour and to take appropriate action.

FORMAL PROCEDURE

A formal procedure should be followed when it is an individual's preference or where an informal approach has failed, in which case a grievance should be raised in accordance with the company Grievance Procedure. All such grievances will be dealt with sensitively and in confidence as far as reasonably practicable to progress the complaint. Both during the investigation of the complaint and afterwards (whatever the outcome), consideration will be given to ensuring that the complainant and the alleged harasser are not required to work together against their wishes. The situation will be monitored after an incident to ensure the complainant receives adequate support.

As a general principle, the decision to progress a complaint lies with the individual. However, the company has a duty to protect all staff and may decide to pursue the matter independently if, in the circumstances, it is considered appropriate to do so.

Staff who make such allegations in good faith will not be victimised or treated less favourably as a result. False or malicious allegations, however, will be dealt with under the Disciplinary Policy. Any member of staff who is found to have committed acts of harassment or bullying will be subject to disciplinary action which if deemed to constitute gross misconduct may result in summary dismissal. Retaliation against a member of staff who complains of harassment can be expected to lead to disciplinary action.

GRIEVANCE PROCEDURE

Galtec is committed to understanding people's concerns and resolving any grievance that an employee may have related to his/her work and to the conditions of employment. Should an employee at any time have a grievance connected with his or her employment it will be the company's intention to consider and resolve it at the earliest opportunity and to the satisfaction of all concerned wherever possible.

The grievance procedure enables individuals to raise issues about their work, their co-workers or customer's actions, where they are affected. However, an initial informal approach can often resolve a problem before it develops or escalates.

The procedure is not contractual but applies to all employees who should familiarise themselves with its provisions. All stages of this process will be dealt with without unreasonable delay.

INFORMAL PROCEDURE

An employee who has a grievance with any aspect of his or her employment should raise it initially with his or her immediate supervisor/line manager as soon as possible after a problem has arisen. Line managers are responsible for listening and responding quickly and consistently to any work related problems that are raised – discussing the matter informally and resolving where possible.

FORMAL PROCEDURE

If no satisfactory informal resolution is possible or the employee considers they have not been fairly treated they may raise it in writing, stating the basis for the grievance, to their immediate supervisor/line manager and it will be treated as a formal grievance. Where the grievance is against the line manager, the complaint should be addressed to an alternative manager.

A senior member of staff or independent HR advisor will, as soon as reasonably practicable, be appointed as investigating officer and carry out an investigation into the matter. The investigation will be confined to establishing the facts and gathering any relevant documentation. Where necessary, the investigating officer will obtain statements from any relevant individuals. An investigatory meeting with the employee may take place if considered appropriate by the investigating officer.

A meeting will be arranged as soon as possible following the investigation. The meeting will be chaired by a manager. At the meeting the employee will have the opportunity to explain their grievance and how they think it may be resolved. Depending on the circumstances, the meeting may be adjourned in order for further investigation to take place. The employee must take all reasonable steps to attend a grievance meeting.

At the meeting, the employee may be accompanied by a colleague or trade union representative of their choice. The manager may be accompanied by another member of the management team or an independent HR advisor. A note taker will usually be present but will not be involved in the decision making process.

The employee will be informed in writing of the outcome of the grievance and the reasons for the decision. If any action is to be taken as a result of the grievance, the employee will, where possible and/or appropriate, be informed.

The decision will be issued as soon as possible following the conclusion of the meeting. Where the matter needs to be investigated and/or the meeting adjourned, the employee will be given an indication of the likely timescale for receiving a response.

APPEAL

If the employee feels that his or her grievance is not satisfactorily resolved, or feels they have been unfairly treated, he or she may, within five working days of the written decision, appeal in writing to a Director.

An appeal hearing will be convened as soon as is reasonable practicable, and will be heard by a Director or a suitable deputy not involved in the case.

At the appeal hearing, the employee may be accompanied by a colleague or a trade union representative of their choice. The Director, or deputy, may be accompanied by another member of the management team or an independent HR advisor. A note taker will usually be present but will not be involved in the decision making process.

Whenever possible, a decision of the appeal and the reasons for it will be given within ten working days of the hearing. This decision will be given in writing and will be final.

RECORD KEEPING

All information held in relation to any grievance case is confidential and will be retained on the employee's personnel file in accordance with the Data Protection Act 1998.

DISCIPLINARY POLICY & PROCEDURE

The Disciplinary Policy and Procedure supports the promotion of good conduct by providing a consistent and fair process to deal with alleged wilful or negligent breaches of company policy and/or required standards of behaviour. It is not contractual but applies to all employees (other than those in their first two years of service) who should familiarise themselves with its provisions.

PRINCIPLES

Wherever possible and appropriate, attempts will be made to resolve concerns of minor breaches of conduct informally. A written record of issues raised informally will be made by the supervisor/manager and will include any actions that have been agreed to address the concerns.

Where informal discussions fail to achieve or sustain the necessary improvement in conduct, or where the breach is considered more serious, the formal Disciplinary Procedure will be invoked – the company reserving the right to commence the procedure at any stage if the circumstances warrant such action.

The following principles apply:

- All disciplinary situations will be dealt with without unreasonable delay.
- Disciplinary action will not be taken before an appropriate investigation has taken place.
- If a disciplinary hearing is called it may be appropriate for the manager conducting the hearing to be different to the member of staff who carried out the investigation.
- No decision to issue a sanction or to dismiss an employee will be taken before they have been given an opportunity to respond to the alleged misconduct in accordance with the procedure set out below.
- Any formal disciplinary sanction imposed will be confirmed in writing, and the employee will be afforded the right of appeal to a more senior manager.
- Employees will have the right to be accompanied by a trade union representative or workplace colleague at any disciplinary hearing or appeal hearing.
- In the event of absence of any of those involved, except for the employee who is the subject of the procedure, a deputy may take their place provided that this will not jeopardise the likelihood of a fair outcome.

For employees who are in their first two years of service Galtec reserves the right to vary the Disciplinary Policy and Procedure outlined in this document. Such a variation will not amount to a breach of this procedure.

SUSPENSION

Where an employee is accused of an act of serious or gross misconduct, or where the circumstance otherwise warrants it, after careful consideration he/she may be suspended from work on full pay pending the outcome of the disciplinary procedure. Such suspension is not a form of disciplinary action and will not predetermine the outcome of the investigation or any ultimate disciplinary action.

Where appropriate, an employee may be temporarily redeployed into an alternative role as an alternative to suspension during the period of investigation.

FORMAL DISCIPLINARY PROCEDURE

Investigation

When a disciplinary situation arises a senior member of staff or independent HR advisor will, as soon as reasonably practicable, be appointed as investigating officer and carry out an investigation into the matter. The investigation will be confined to establishing the facts and gathering any relevant documentation. Where necessary, the investigating officer will obtain statements from any relevant individuals. An investigatory meeting with the employee may take place if considered appropriate by the investigating officer.

Notification

If, as a result of the investigation, it is decided that there is a disciplinary case to answer, the employee will be invited to attend a disciplinary meeting for which reasonable notice will be given.

The employee will be informed in writing of the nature of the complaint and where appropriate, will be provided with copies of any written evidence gathered during the investigation. (Where appropriate witness statements may be edited to ensure anonymity)

Where either party intends to call any relevant witnesses at the disciplinary meeting, advance notice of their intention to do so must be given.

Disciplinary Meeting

A disciplinary meeting will be conducted by a manager. The employee may be accompanied by a trade union representative or colleague if desired. The employee and their companion should make every effort to attend the disciplinary meeting. In the event that the employee fails to attend the disciplinary meeting this will usually be rearranged once, but should they fail to

attend the rearranged meeting then a decision may be reached in their absence.

The employee will be given the full opportunity at the disciplinary meeting to explain the matter and respond to the allegations.

A note taker will usually be present but will not be involved in the decision making process.

The outcome will usually be delivered on the same day. Where this is not possible, for example where there is a large amount of information to consider or where further investigation is required, the hearing may be reconvened at a later date.

If following the disciplinary meeting it is decided that disciplinary action is warranted, the employee will be advised of the decision in writing which will specify the details of:

- the failure to meet the required standard
- any action required by the employee to remedy the situation
- any sanction issued (see below)
- any relevant review period /duration of warning and the consequences of continued or subsequent failure to reach and sustain the required standard of conduct
- the right of appeal

Sanctions

In the event that disciplinary action is warranted one of the sanctions below may be issued. A sanction may be imposed at any level including summary dismissal depending on the circumstances.

- Verbal Warning

In the case of minor offences the employee will be given a formal verbal warning. The employee will be advised of the reason for the warning, the formal nature of the warning and possible future consequences and specifying, if appropriate, the improvement required and over what period.

- Written Warning

In the case of more serious offences, or where there is already an active verbal warning on the employee's records, the employee will be given a written warning, setting out the precise nature of the offence, the likely consequences of further offences and specifying, if appropriate, the improvement required and over what period.

- **Final Written Warning**

In the case of a sufficiently serious offence, or where there is already an active written warning on the employee's records the employee will be given a final written warning, setting out the precise nature of the offence, the likely consequences of further offences and specifying, if appropriate, the improvement required and over what period. This may include a statement that any recurrence or no improvement may lead to a dismissal or to some other action short of dismissal.

- **Dismissal**

Dismissal will be appropriate if there is any misconduct during your probationary period, further misconduct where there is an active final written warning on the employee's record, or any act of gross misconduct regardless of whether there are any active warnings on record. In the case of gross misconduct the employee will normally be dismissed without notice or payment in lieu of notice (i.e. summary dismissal). If the decision to dismiss is made the employee will be informed in writing of the reason for dismissal, the date on which the contract between the parties will terminate and any appropriate period of notice. Dismissal must be authorised only by a Director.

Alternatives to Dismissal

The company reserves the right to consider other formal action, including (but without limitation): demotion or job change; loss of seniority or pay increment; suspension without pay.

Gross Misconduct

In exceptional circumstances, employees may be dismissed without notice if it has been established, after investigation and after hearing the employee's explanation at a disciplinary meeting, that there has been an act which constitutes gross misconduct.

Examples of actions which constitute gross misconduct include (but are not limited to):

- Theft, fraud and dishonesty.
- Criminal offences, whether committed during the course of duties or otherwise, that directly affect an employee's ability to carry out their job, or that have serious implications concerning the propriety of them continuing in their job.
- Deliberate damage to company property or that of co-workers.
- Gross insubordination, insulting or indecent behaviour, or a persistent refusal to comply with a reasonable management instruction.

- Serious harassment, discrimination or victimisation including display or distribution of any material which could amount to harassment or discrimination (such as obscene or pornographic material).
- Serious breach of health and safety rules.
- Being under the influence of, or in possession of, drink or illegal drugs at work.
- Disorderly or threatening conduct on company premises.
- Negligence resulting in serious loss, damage, or injury.
- Assault or attempted assault.
- Disclosure of confidential information relating to Galtec business to any person, firm or company, without prior authorisation.
- Serious breach of trust and confidence (including engaging in other paid employment during an employee's contracted hours without permission) and any conduct which is in direct opposition to, or is calculated to undermine, the interests of Galtec and its customers.
- Failure to comply with procedures designed to secure and safeguard personal and business sensitive data from loss or unauthorised access; a serious breach of Data Protection or unauthorised entry to computer records.
- Falsification of records
- Breach of company policies or procedures (especially those relating to Health & Safety)
- Any act which is deemed to be seriously detrimental to the conduct of Galtec's business or its public image.

Appeal

An employee may appeal against any formal disciplinary decision within five working days of receipt of the written decision. Such appeals are to be made in writing to a Director stating the grounds for appeal and any supporting documentary evidence.

The appeal hearing will be convened as soon as is reasonably practicable. The appeal hearing will be held by a Director or a suitable deputy not involved in the case. Where new evidence arises prior to or during the appeal the employee will be given access to any relevant information or evidence and will have the opportunity to make representations. The employee will have the right to be accompanied at any appeal hearing by a colleague or trade union representative.

The outcome will usually be delivered on the same day. Where this is not possible, for example where there is a large amount of information to consider or where further investigation is required, the appeal hearing may be reconvened at a later date.

The employee will be informed in writing of the decision of the appeal hearing following the conclusion of the hearing. Such decision will be final. In the event of an unsuccessful appeal against a decision to dismiss the original dismissal date shall stand.

Record Keeping

A copy of all formal warnings will be retained on an employee's personal file but will be considered expired after the following periods:

- A note of a verbal warning, after a period of six months;
- A copy of a first written warning, after a period of twelve months.
- A copy of a final written warning, after a period of twelve months.

Live warnings issued under the disciplinary procedure may, if appropriate, be taken into consideration when considering the level of warning to be given under the capability procedure, and vice versa.

All information held in relation to any disciplinary case are confidential and will be retained on the employee's personal file in accordance with the Data Protection Act 1998.

Company Bonus

If a company bonus is paid, employees who have received Disciplinary sanctions during the bonus period and/or have live warnings at the time the bonus is paid may not be eligible to receive it.

CAPABILITY POLICY & PROCEDURE

The Capability Policy and Procedure aims to ensure fairness and consistency throughout the company and provides for warnings to be given for failure to meet required standards of job performance. It is not contractual but applies to all employees (other than those in their first two years of service) who should familiarise themselves with its provisions.

This procedure applies where an employee is failing to carry out their responsibilities or duties in a satisfactory manner, due to a lack of ability, aptitude, experience or qualifications or on health grounds.

It should be noted that where an employee's unsatisfactory job performance is clearly due to the employee's own lack of effort, carelessness or negligence, the issue will be dealt with under the company's Disciplinary Procedure.

PRINCIPLES

The procedures set out in this document aim to ensure that there is:

- Openness and awareness for employees when they are not meeting the required levels of performance.
- A means of monitoring performance and establishing performance criteria.
- A degree of consistency in how employees are given opportunities to attain satisfactory levels of performance.
- Assistance in identifying the most appropriate form(s) of support and providing that support

Wherever possible and appropriate, attempts will be made to address performance concerns informally. A written record of issues raised informally will be made by the supervisor/manager and will include any actions that have been agreed to address the concerns. Such actions are likely to include appropriate training, coaching and support for the employee.

Where the informal approach fails to achieve or sustain the necessary improvement in performance, or where the shortfall is considered more serious, the formal Capability Procedure will be invoked – the company reserving the right to commence the procedure at any stage if the circumstances warrant such action. The following principles apply:

- The procedure will be invoked when performance issues arise or are identified either following an appraisal process or otherwise.
- No decision to issue a warning or to dismiss an employee will be taken before they have been given an opportunity to respond to the alleged performance shortfall in accordance with the procedure set out below.
- The company will consider what training and support it can give the employee to help them meet the performance requirements
- Any formal capability sanction imposed will be confirmed in writing, and the employee will be afforded the right of appeal to a more senior manager.
- Employees will have the right to be accompanied by a trade union representative or workplace colleague at any capability hearing or appeal hearing.

For employees who are in their first two years of service Galtec reserves the right to vary the Capability Policy and Procedure outlined in this document. Such a variation will not amount to a breach of this procedure.

FORMAL CAPABILITY PROCEDURE

Notification

If it is considered necessary to invoke the formal capability procedure the employee will be invited to attend a capability hearing for which reasonable notice will be given.

The employee will be informed in writing of the details of the alleged shortfall or failure in performance, together with any evidence relied upon if practicable and available.

Capability Hearing

A capability hearing will be conducted by a manager. The employee may be accompanied by a trade union representative or colleague if desired. The employee and their companion should make every effort to attend the meeting. In the event that the employee fails to attend the meeting this will usually be rearranged once, but should they fail to attend the rearranged meeting then a decision may be reached in their absence.

The hearing provides an opportunity for the root cause of the perceived lack of capability to be thoroughly and objectively explored. The employee will be given the full opportunity at the capability hearing to offer their explanation and respond to the allegations.

A note taker will usually be present but will not be involved in the decision making process.

The outcome will usually be delivered on the same day. Where this is not possible, for example where there is a large amount of information to consider or where further information or investigation is required, the hearing may be reconvened at a later date.

If following the capability hearing it is decided that formal action is warranted, the employee will be advised of the decision in writing which will specify the details of:

- the failure to meet the required standard
- any action required by the employee to remedy the situation
- any warning issued (see below)
- any relevant review period /duration of warning and the consequences of continued or subsequent failure to reach and sustain the required standard of performance
- the right of appeal

These details may be captured in a supporting document such as a Performance Improvement Plan.

Performance Warnings

As a result of the capability hearing one of the performance warnings below may be issued. A warning may be imposed at any level including dismissal depending on the circumstances.

- Written Warning

In the case of serious shortfall or failure, or a repetition of earlier shortfall or failure, the employee will be given a written warning, setting out the precise nature of the shortfall or failure, the likely consequences of further shortfall or failure and specifying, if appropriate, the improvement required and over what period. Objectives, timescales and measures for the performance improvement should be set. Help should be offered with training and supervision as required. A written warning will be kept on the employee's personal file but will be considered expired after 12 months. The employee's performance may be appraised, at intervals to be determined by the manager, at any time during this period.

- Final Written Warning

In the case of a further repetition of earlier shortfall or failure, if improvement is still failed to be achieved, or if the shortfall or failure is serious enough to warrant only one written warning, the employee will be given a final written warning setting out the precise nature of the shortfall or failure and containing a statement that any recurrence or failure to improve will lead to dismissal or whatever other penalty is considered appropriate, and specifying, if appropriate, the improvement required and over what period. Objectives, timescales and measures for the performance improvement should be set. Help should be offered with training and supervision as required. A final written warning will be kept on the employee's personal file but will be considered expired after 12 months. The employee's performance may be appraised, at intervals to be determined by the manager, at any time during this period.

- Dismissal

Dismissal will be appropriate if there is any poor performance during your probationary period, or where all of the appropriate stages of the warning procedure have been exhausted and there is an active final written warning on the employee's record. If the decision to dismiss is made the employee will be informed in writing of the reason for dismissal, the date on which the contract between the parties will terminate and the appropriate period of notice. Dismissal must be authorised only by a Director.

Alternatives to Dismissal

The company reserves the right to consider other formal action, including (but without limitation): demotion or job change; loss of seniority or pay increment; suspension without pay.

Long term sickness absence

Where an employee's underperformance is as a result of long term sickness absence then the company will always seek medical advice prior to making a decision about an employee's ongoing employment. Galtec will also consider whether there are any reasonable adjustments which can be made to assist the employee to perform their role. In cases where the company has concerns about the employee's long term ability to perform their job as a result of health grounds the company will normally move to dismissal stage without prior warnings.

Appeal

An employee may appeal against any formal capability decision within five working days of receipt of the written decision. Such appeals are to be made in writing to a Director stating the grounds for appeal and any supporting documentary evidence.

The appeal hearing will be convened as soon as is reasonably practicable. The appeal hearing will be held by a Director or a suitable deputy not involved in the case. Where new evidence arises prior to or during the appeal the employee will be given access to any relevant information or evidence and will have the opportunity to make representations. The employee will have the right to be accompanied at any appeal hearing by a colleague or trade union representative.

The employee will be informed in writing of the decision of the appeal hearing following the conclusion of the hearing. Such decision will be final. In the event of an unsuccessful appeal against a decision to dismiss the original dismissal date shall stand.

Record Keeping

Live warnings issued under the capability procedure may, if appropriate, be taken into consideration when considering the level of warning to be given under the disciplinary procedure, and vice versa.

All information held in relation to any disciplinary case are confidential and will be retained on the employee's personnel file in accordance with the Data Protection Act 1998.

Company Bonus

If a company bonus is paid, employees who have received Performance Warnings during the bonus period and/or have live warnings at the time the bonus is paid may not be eligible to receive it.

Relationship with Disciplinary Procedure

An employee may be dismissed following exhaustion of the formal capability procedure and have no separate right to have the disciplinary procedure followed prior to dismissal.

3) ABSENCE FROM WORK: Policies and Procedures

Galtec expects employees to attend work as outlined in individual contracts of employment and confirmed by their manager. It is every employee's responsibility to be at work when they should be. Any absence during working hours should be authorised in advance by the employee's manager however it is recognised that unexpected absence or absence due to sickness is sometimes unavoidable.

SICKNESS ABSENCE

Galtec is committed to managing employees' wellbeing and controlling levels of absence to the benefit of colleagues and customers alike. The policy and procedures for absence due to sickness or injury are outlined below:

SICKNESS NOTIFICATION AND CERTIFICATION

Any absence on account of sickness or injury should be notified to the company in person by a telephone conversation with the employee's immediate supervisor/line manager or appropriate deputy as soon as possible and in any case no later than 9am on the first day of absence. If they are unable to make the call themselves the employee should ask a dependant/relative/friend to do so.

For periods of absence of up to seven calendar days (including a weekend, Bank Holiday or non-working day) all employees will be required to complete a self-certification form as soon as they return to work. For periods of absence beyond seven calendar days a doctor's certificate must be provided. In the event of a protracted illness further doctor's certificates will be required on a regular basis to cover the entire period of absence.

The company reserves the right to challenge an employee's self-certification of sickness and may ask an employee at any stage of absence to produce a medical certificate. Failure to provide a certificate when required may be regarded as unauthorised absence.

In cases where an employee falls sick or injured just before or during a period of annual leave the notification procedures must be adhered to. In addition, a doctor's certificate must be provided, irrespective of the duration of the period of absence.

During the period of absence employees are obliged to keep the company informed on a daily basis and by direct contact with their supervisor/line manager, unless agreed otherwise, as to their progress and likely return to work date.

The company reserves the right to ask the employee to undergo a medical examination by an independent doctor at the company's expense, or to request a medical report on their health from their GP or consultant. The employee's

consent will be sought for the disclosure of any resulting report. Any information received from a medical examination will be kept confidential and in accordance with the Data Protection Act 1998.

RETURNING TO WORK

Upon returning to work, the employee's manager or appropriate deputy will hold a 'return to work' discussion to understand the reason for the absence, irrespective of the duration.

Where appropriate, the company will facilitate employees' return to work – this may involve a 'return to work' plan and, where the employee has an injury or is disabled, may include any reasonable adjustments necessary in order to help the employee get back to work.

SICK PAY

Providing the employee meets the relevant eligibility criteria and complies with the provisions within the contract of employment and the Sickness Absence policy, they will normally be paid Statutory Sick Pay (SSP). Employees are required to co-operate in the maintenance of necessary records accordingly.

SICKNESS MONITORING AND MANAGEMENT

The company will approach cases of ill health with support, compassion and understanding. However, high levels of absenteeism or repeated periods of sickness absence can cause considerable disruption and can place an undue burden on colleagues.

Absence at Galtec is monitored and unacceptable levels of absence will be managed appropriately, taking into account the circumstances of each case. This may include formal action such as an employee being placed on an Attendance Improvement Plan. If an employee's absence levels do not improve and there is no underlying medical condition this may result in disciplinary action and may ultimately lead to dismissal.

DOCTOR, DENTIST AND HOSPITAL APPOINTMENTS

Employees should, wherever possible, arrange any medical appointments outside normal working hours. If this is not possible, manager's permission for time off should be sought **in advance** in which case the employee may be required to take annual leave or unpaid leave. In such cases the employee (or for site staff, their supervisor) will be required to complete a Permissible Absence form for absence recording.

Absences for antenatal appointments are covered under separate policies.

UNAUTHORISED ABSENCE

Absence from work without leave or adequate explanation is a breach of discipline and may lead to disciplinary action. Unauthorised absence will be unpaid and the company reserves the right to make deductions from pay in respect of such absence. Persistent poor timekeeping, including arriving late without prior authorisation, may also lead to disciplinary action.

TIME OFF FOR DEPENDANTS

All employees are entitled to take a reasonable period of time off work to deal with an emergency involving a dependant, or unplanned, unexpected or sudden disruption in their care arrangements, and to make any necessary longer term arrangements.

This may include, but is not limited to;

- If a dependant falls ill or has been injured or assaulted;
- To deal with an unexpected disruption or breakdown in care arrangements e.g. when the child minder or nurse fails to turn up;
- To deal with an incident involving their child during school hours.

A dependant is the spouse, civil partner, child or parent of the employee or someone who lives with the employee as part of their family. It does not include tenants or boarders living in the family home or someone who lives in the household as an employee.

In case of illness or injury or where care arrangements break down, a dependant may also be someone who reasonably relies on the employee for assistance, for example an aunt who lives nearby who the employee looks after outside work who falls unexpectedly ill.

This right is intended to cover genuine emergencies. In most cases 1 or 2 days would be deemed a reasonable amount of time off sufficient to deal with the problem. There is no limit on the number of times an employee can be absent from work under this right. Under this right any time off is unpaid.

On the first day of absence the employee must inform their manager or appropriate deputy as soon as possible, and in any case no later than one hour before the beginning of a planned shift, of the reason for their absence and if possible, the likely length of its duration.

Upon return to work the employee (or for site staff, their supervisor) will be required to complete a Permissible Absence form for absence recording. Abuse of this right will be dealt with in accordance with the company's disciplinary procedure.

APPOINTMENTS FOR DEPENDANTS

The right to attend medical appointments etc with a dependant is not covered under this policy because generally they are not unexpected or an emergency.

Employees should, wherever possible, arrange any such appointments outside normal working hours. If this is not possible, manager's permission for time off should be sought in advance in which case the employee may be required to take annual leave or unpaid leave. In such cases the employee (or for site staff, their supervisor) will be required to complete a Permissible Absence form for absence recording.

COMPASSIONATE LEAVE

Compassionate leave will be granted to all employees following the death of an immediate family member which is defined as parents, children, spouse, siblings, grandparents and grandchildren. Up to 5 days unpaid compassionate leave may be taken in respect of the death of an immediate family member at the discretion of a Director. Additional time off or time off for family members who do not fall within the definition above is given at the sole discretion of a Director. Compassionate leave should be approved in advance, whenever possible, by a Director.

OTHER LEAVE

Galtec will recognise other statutory rights to take paid time off work, for example:

- Recognised union and accredited safety representatives may take reasonable time off to attend to their duties and undergo training.
- Pregnant women and fathers-to-be may take time off for ante-natal care in accordance with the company's Maternity and Paternity Policies.
- Employees under notice of redundancy, who have at least two years' service, may take reasonable time off to seek work or arrange training.

The holders of certain public offices may have the statutory right to take reasonable unpaid time off to fulfil their duties and the company recognises such rights.

The company may also at its discretion allow time off work in other circumstances, including time off to attend court as a witness, to carry out jury service, or for study leave. The employee must obtain advance permission from their manager and complete (or for site staff, their supervisor complete) a Permissible Absence form for absence recording.

ANNUAL LEAVE

All holidays must be taken at times convenient to the Company and as agreed with the employee's supervisor/manager. Employees must give as much notice as is practically possible via a Permissible Absence Form (or for site staff, to their supervisor) of their intention to take holiday. Any holidays of a period of longer than 2 consecutive weeks should be approved by a Director.

4) FAMILY FRIENDLY LEAVE: Policies and Procedures

MATERNITY LEAVE

When an employee becomes pregnant Galtec will provide help and support throughout the pregnancy and maternity leave period. So that a risk assessment can be carried out, it is important that employee's inform their manager that they are pregnant as soon as practicable.

ANTE-NATAL CARE

All pregnant employees are entitled to paid time off to attend antenatal appointments regardless of length of service. Appointment times should be confirmed with the employee's manager giving as much notice as possible and providing the appointment card where requested. The employee (or for site staff, their supervisor) will be required to complete a Permissible Absence form for absence recording.

Parent craft classes or relaxation classes should be attended out of core working hours wherever possible. Where this is not possible manager's permission for time off should be sought in advance in which case the employee will be required to take annual leave or unpaid leave. In such cases the employee (or for site staff, their supervisor) will be required to complete a Permissible Absence form for absence recording.

MATERNITY LEAVE

All pregnant employees regardless of length of service or hours worked are entitled to take up to 52 weeks maternity leave, of which 26 weeks is Ordinary Maternity Leave and 26 weeks is Additional Maternity Leave. Additional Maternity Leave follows Ordinary Maternity Leave and there can be no gap between the two.

All pregnant employees must take a minimum of 2 weeks' maternity leave immediately following the birth. This is compulsory maternity leave.

Maternity leave can commence any time from the 11th week before the EWC (Expected Week of Childbirth), or from the day of the child's birth if it is premature, provided that the company is notified in writing by the 15th week before the EWC, of:

- the fact that the employee is pregnant;
- the date of the EWC;
- the intended start date of maternity leave;

and a Form MAT B1 is submitted which is a certificate from the GP or midwife confirming the EWC.

The company will reply to the employee within 28 days to inform them of the date by which they are expected to return to work if they take their full leave entitlement.

The start date of an employee's maternity leave can be changed providing they give the company 28 days notice unless it is not reasonable practicable to give this much notice, for example if the baby is born early.

Maternity leave cannot start any earlier than 11 weeks before the EWC, unless the baby is born early and maternity leave starts automatically.

A pregnancy related illness during or after the 4th week before the EWC automatically triggers maternity leave.

Employees are requested to inform the company as soon as possible after their baby is born to advise of the actual date of birth for record purposes.

STATUTORY MATERNITY PAY (SMP)

To qualify for SMP the employee must:-

- be pregnant and have reached the start of the 11th week before the EWC or have had the baby by then;
- have been continuously employed for at least 26 weeks by the end of the Qualifying Week (which is the 15th week before the EWC);
- have had normal weekly earnings at a rate not less than the lower earnings limit for National Insurance contributions for a period of 8 weeks immediately preceding the Qualifying Week;
- have stopped actually working for the company;
- give 28 days' advance notice of their absence and submit Form MATB1.

The SMP period lasts for a maximum of 39 weeks.

There is no distinction between part-time and full-time employees for SMP purposes.

If an employee is entitled to SMP, they will receive 9/10ths of their average weekly earnings for the first 6 weeks and the current weekly SMP rate, from time to time in force, for the remaining period, (i.e. 33 weeks) subject to the usual deductions.

If an employee earns less than the weekly SMP rate, they will receive SMP at 9/10ths of their average weekly earnings for the whole 39 week period.

If an employee is entitled to maternity pay, they will be able to receive SMP for the 39 weeks that they are away from work, unless they return to work earlier in which case their entitlement to SMP will stop on their return.

An employee who does not qualify for SMP may be entitled to Maternity Allowance which is payable by the Department for Work and Pensions.

RETURN TO WORK

If an employee wishes to return to work before the end of the full 52 weeks maternity leave, they must give the company at least 8 weeks' notice of their intention to return to work early. Thereafter if they decide they would like to change the date of their return to work, they can do so providing they give the company at least 8 weeks' notice.

If an employee has completed at least 1 year's service they may choose to postpone their return to work by taking Parental Leave [see Parental Leave Policy].

If an employee is unable to return to work due to illness they will be required to comply with the normal sickness notification requirements as detailed in the Sickness Absence Policy.

If an employee does not wish to return to work following their maternity leave they should provide the company with sufficient notice, and at least the amount of notice required by their contract of employment. If an employee confirms that they will not return to work after having the baby, they will still be entitled to 39 weeks' SMP if they qualify.

Maternity returnees are entitled to any salary increases or enhanced benefits that are introduced in their absence. Holiday entitlement continues to accrue during an employee's maternity leave and can be added to the end of maternity leave or used to support a phased return to work in agreement with the manager. However, accrued holiday entitlement must be taken within the first 3 months following the employee's return to work, and required notice provisions must be given.

"KEEPING IN TOUCH DAYS"

During the maternity leave period the company may make reasonable contact with the employee and will keep them informed of promotion opportunities or information relevant to their job.

During the maternity leave period, an employee may complete up to 10 days work by mutual agreement with the company without it affecting their SMP or entitlement to maternity leave e.g. to attend training. These are known as Keeping in Touch (KIT) days.

Any amount of work done on a KIT day will count as a whole KIT day. An employee will receive payment for the actual hours worked during a KIT day at their normal hourly rate, less any SMP already being paid.

KIT days may not take place within two weeks after the baby is born.

KIT days are not compulsory and an employee will not suffer any consequence if they decline the offer of a KIT day. Similarly, employees do not have a right to KIT days and the company is under no obligation to agree to a KIT day.

PATERNITY LEAVE

Employees who are the biological father of a child, or the husband, civil partner or partner of the mother, or in any case have parental responsibility for a child's upbringing (that is a “qualifying relationship”), may be entitled to paternity leave and/or some time off for antenatal appointments.

ANTE-NATAL CARE

All qualifying employees and agency workers (if they have been working in the same role continuously for a minimum of 12 weeks) are entitled to unpaid time off to accompany a pregnant woman to up to two antenatal appointments, for a maximum of 6.5 hours per appointment, subject to prior management approval. Appointment times should be confirmed with the employee’s manager giving as much notice as possible and providing a written declaration if requested. The employee (or for site staff, their supervisor) will be required to complete a Permissible Absence form for absence recording.

PATERNITY LEAVE

To be entitled to paternity leave an employee must have worked continuously for the company for 26 weeks leading into the 15th week before the baby is due.

If eligible, an employee can take up to 2 weeks paternity leave. To claim entitlement they will need to give the company notice by completing a Paternity Leave Self Certification form by no later than the 15th week before the baby is due. Providing false information on a certificate in order to claim paternity leave will be a disciplinary offence.

Paternity leave must be taken within 56 days of the birth (or, if the birth is early, any time between birth and 56 days after the date the baby is due). The leave can be taken as either one week or two weeks, but not odd days. If two weeks are taken they must be consecutive. A maximum of 2 weeks' paternity leave is permitted per pregnancy, regardless of how many children are born.

The start date of an employee’s paternity leave can be changed providing they give the company 28 days notice unless it is not reasonable practicable to give this much notice, for example if the baby is born early

STATUTORY PATERNITY PAY (SPP)

If paternity leave is taken in accordance with this policy, the employee will be eligible for Statutory Paternity Pay (SPP), provided their weekly earnings are over the lower earnings limit for National Insurance purposes.

An employee entitled to SPP will receive the current weekly rate, from time to time in force, or 9/10ths of their average weekly earnings, whichever is the lower.

An employee who is not entitled to SPP may be entitled to Income Support from the Department of Work and Pensions.

ADOPTION LEAVE AND PAY

The company follows the statutory provisions for adoption leave and pay. Information concerning adoption leave and pay entitlements may be obtained from a Director.

SHARED PARENTAL LEAVE (SPL)

Shared Parental Leave gives employees who are parents the option of sharing up to 50 weeks of leave and 39 weeks of pay during the first year of their child's life or placement for adoption, subject to them meeting the necessary eligibility criteria. Parents may be able to take this leave at the same time or at different times, and discontinuous periods of SPL may be possible.

This essentially allows parents to share the statutory maternity leave and pay available to mothers (or adoption leave and pay currently only available to the primary adopter) if they so choose. It does not however replace maternity leave provisions. Provisions for ordinary paternity leave remain however the introduction of SPL effectively abolished previous additional paternity leave provisions.

These rights also apply to partnerships of the same sex, so references in this policy to fathers should be taken as including women in same-sex partnerships.

ELIGIBILITY

The following conditions must be met for entitlement to SPL:-

- Both sets of parents must share the main responsibility for the care of the child. This applies to a partner of the mother who is not the child's natural father where the natural father does not share the main caring responsibilities.
- At least one parent must be an employee. They must have been continuously employed for at least 26 weeks by the end of the Qualifying Week (which is the 15th week before the EWC) and they should still be employed in the first week that SPL is to be taken.
- The other parent must either also satisfy the criteria in the bullet above OR must have worked (in an employed or self-employed capacity) in at least 26 of the 66 weeks before the EWC and have average weekly earnings above the Maternity Allowance threshold.

- The necessary evidence, statutory notices and declarations are given, including notice to end any maternity leave, statutory maternity pay or maternity allowance periods.

NOTIFICATIONS, REQUESTS AND EVIDENCE

The maximum amount of SPL that can be shared between the parents is 50 weeks, and this can only be taken during the 12 months following the birth (or adoption date). SPL can be taken separately by each parent or at the same time. It must be taken in multiples of complete weeks and is subject to a one week minimum period. There is no requirement to use the full allocation.

Mothers can return to work after ending their maternity leave and take SPL at a later date/s (subject to notice requirements below). Similarly the father, or mother's partner, can take SPL at any time – it does not need to start as soon as the mother has given notice to curtail her entitlement to maternity leave or returned to work.

Fathers, or the mother's partner, may wish to consider using their 2 weeks paternity leave before taking SPL as once SPL is started any untaken paternity leave will be lost. SPL entitlement is additional to paternity leave entitlement.

SPL can also be taken when the other partner is on another type of leave, such as paternity leave or unpaid parental leave. In addition, a father could start a period of SPL while the mother is still on maternity leave *provided* she has given a binding notice to end her entitlement to maternity leave (see below).

To elect into the SPL regime there are various different notices which may need to be given by both parents at different times, as follows:

1) Opting out of Maternity Leave

This is the first notice requirement. In order to make SPL available the mother must give notice to end her entitlement to maternity leave early. This means that the portion of maternity leave which is untaken by the mother can, in effect, be converted into SPL available to either parent. (Note, the 2 weeks of maternity leave immediately following the birth are compulsory and may not be shared in this way i.e. SPL cannot begin earlier than 2 weeks following the child's birth.)

The mother must give her employer a minimum of 8 weeks written notice to end her maternity leave. The notice must state the date maternity leave will end and can be given either before or after the birth (noting that maternity leave cannot be ended until at least 2 weeks after the birth).

If this 'curtailment notice' is given before the birth the mother may revoke the notice in writing up to 8 weeks after it was given, or up to 6 weeks following the birth, whichever is the later. Maternity leave curtailment can also be revoked up to 8 weeks after it was given if it transpires neither parent is eligible for SPL or SShPP (Statutory Shared Parental Pay), or if the other parent has died. If the curtailment notice is given after the birth it is binding.

The child's father, or mother's partner, will only be able to take SPL once the mother has either:

- returned to work, or
- given her employer a curtailment notice to end her maternity leave, or
- given her employer a curtailment notice to end her SMP (if she is entitled to SMP but not maternity leave), or
- given a curtailment notice to the benefits office to end her MA (if she is not entitled to maternity leave or SMP).

2) Opting in to Shared Parental Leave and Pay

Both parents should let their respective employers know that they are eligible for and intend to take SPL.

An employee wishing to take SPL must submit a written 'notice of entitlement' to Galtec at least 8 weeks before the start of the first period of SPL stating:

- the name and national insurance numbers of both parents
- the start and end date of any period of statutory maternity leave taken/to be taken by the mother (or if she is not entitled to maternity leave, the start or end dates of any SMP or maternity allowance period)
- the total SPL available, which is 52 weeks minus the number of weeks' maternity leave, SMP or MA period taken or to be taken
- the number of weeks of SPL intended to be taken by each parent and the proposed pattern, including start and end dates. This is non-binding at this stage but is helpful for business planning purposes.
- declarations by *each* parent that they meet the statutory conditions for entitlement to SPL and, where applicable, SShPP.

The company also reserves the right to request, within 14 days of receiving the 'notice of entitlement', the following:

- the name and address of the other parent's employer
- a copy of the birth certificate (or if a birth certificate has not been obtained, a signed declaration of the child's date and place of birth), or

- in the case of adoption, details of the adoption agency, the date of being informed of the adoption match, and the expected placement date.

3) a) Period of Leave Notice

Having opted in to the SPL system a written 'period of leave' notice must be given by the parents to their employers stating the start and end dates of the period/s of leave requested. If the 'period of leave' notice is given before the child is born then the start date may be expressed as a number of days from the date the child is born. The 'period of leave' notice can request one or more periods of leave.

The 'period of leave' notice can be given at the same time as the 'opt-in' notice, or it can be given later, as long as it is given at least 8 weeks before the start of the leave. In addition, and if applicable, the dates on which SShPP will be claimed must also be stated in this notice.

Up to three 'period of leave' notices can be given in total by each parent, including requests to vary a period of leave that has already be arranged (see below).

If the notice is for a single period of continuous SPL, the employee is automatically entitled to take the leave set out in the notice, providing they meet the SPL eligibility criteria.

In general, a period of leave should set out a single continuous block of leave. However, Galtec *may* be able to agree a 'period of leave' notice where the SPL is discontinuous (i.e. split into shorter periods with periods of work in between), subject to business needs and impact. If an employee submits a request for discontinuous SPL, Galtec will consider the request and seek to reach an agreement on an acceptable pattern of leave within 2 weeks of the request. The outcome may be agreement to the requested periods of leave; proposal of alternative dates; or a refusal. If agreement cannot be reached on discontinuous periods of SPL then the employee may either withdraw the request or take the total amount of leave requested as one continuous period of leave. If the employee chooses to take the total amount as one continuous period of leave they may either

- a) take the leave starting on the start date given in the notice, or
- b) choose a new start date (which must be at least 8 weeks after the 'original period of leave' notice was given) and inform Galtec within 5 days of the confirmation of outcome of consideration of the original request

b) Variations to a Period of Leave Notice

The information about how and when parents intend to take and allocate SPL and, where applicable, SShPP is non-binding. A period of SPL can be cancelled, or the dates and/or duration changed, by the employee giving at least 8 weeks notice before the original start date &/or new start date. The variation notice may also request a single period of leave to become discontinuous or vice versa.

If the original 'period of leave' notice was given before the child was born (and therefore the start date expressed as a number of days from the date the child is born) and the child is subsequently born earlier than the EWC, 8 weeks notice is not required to change the dates of SPL however notification should be given in writing as soon as possible.

A notice to change or cancel a period of SPL will count as one of the three permissible 'period of leave' notices, unless the variation is as a result of the child being born earlier or later than the EWC; the variation is at the company's request; or it is agreed otherwise.

STATUTORY SHARED PARENTAL PAY (SShPP)

To qualify for SShPP the parent must:-

- have been continuously employed for at least 26 weeks by the end of the Qualifying Week (which is the 15th week before the EWC) and they should still be employed in the first week that SPL is to be taken.
- have had normal weekly earnings at a rate not less than the lower earnings limit for National Insurance contributions for a period of 8 weeks immediately preceding the Qualifying Week.
- satisfy the eligibility criteria, in particular with respect to the other parent

Up to 39 weeks of SShPP (less any weeks of maternity pay or adoption pay claimed by either parent) will be available to share between eligible parents.

There is no distinction between part-time and full-time employees for SShPP purposes.

If an employee is entitled to SShPP, they will receive the current weekly statutory prescribed rate, from time to time in force, or 9/10ths of their average weekly earnings, whichever is lower, for the period of leave (up to a maximum of 37 weeks shared between the parents) subject to the usual deductions.

The remaining 13 weeks of SPL are unpaid.

RETURN TO WORK

A period of SPL can be ended early by providing 8 weeks notice in writing (see 'variation' notice above).

Employees returning to work after a total leave period of 26 weeks or less (whether or not taken consecutively) will be entitled to return to the same job and on the same terms of employment. This leave period includes any combination of maternity, adoption, paternity or shared parental leave. Employees who have taken more than 26 weeks leave have the right to return to either the same job, or a similar job on no less favourable terms if this is not reasonably practicable.

SPL returnees are entitled to any salary increases or enhanced benefits that are introduced in their absence. Holiday entitlement continues to accrue during an employee's SPL and can either be added to the end of the leave period or used to support a phased return to work in agreement with the manager. However, accrued holiday entitlement must be taken within the first 3 months following the employee's return to work, and required notice provisions must be given

"KEEPING IN TOUCH DAYS"

During the SPL period the company may make reasonable contact with the employee and will keep them informed of promotion opportunities or information relevant to their job.

During the SPL period, an employee (i.e. each parent) may complete up to 20 days work by mutual agreement with the company without it affecting their SShPP or entitlement to SPL e.g. to attend training. These are known as Shared Parental Leave in Touch (SPLIT) days.

These SPLIT days are in addition to any KIT days that the mother may have taken during maternity leave.

Any amount of work done on a SPLIT day will count as a whole SPLIT day. An employee will receive payment for actual hours worked during a SPLIT day at their normal hourly rate, less any SShPP already being paid.

SPLIT days are not compulsory and an employee will not suffer any consequence if they decline the offer of a SPLIT day. Similarly, employees do not have a right to SPLIT days and the company is under no obligation to agree to a SPLIT day.

PARENTAL LEAVE

Parental leave is a right to take time off work to look after or care for a child.

Employees with one year's service and a child (including adopted children) under the age of 18 are entitled to take a total of 18 weeks unpaid leave. If twins are born, then each parent is entitled to 18 weeks' leave for each child. The right to take the leave exists until the child's 18th birthday.

At least 21 days' written notice of the intention to take parental leave must be given by the employee.

The right to take the leave exists until the child's 5th birthday or until five years have elapsed following placement in the case of adoption (or the child's 18th birthday if this is earlier). Parents of disabled children are able to use their leave over a longer period, up until the child's 18th birthday.

Parental leave may only be taken in blocks or multiples of 1 week, up to a maximum of 4 weeks' leave in a year. Parents of disabled children can take leave in blocks or multiple blocks of 1 day.

The company may postpone leave for up to 6 months where it considers that the employee's absence would be unduly disruptive. However, the company cannot postpone leave when an employee gives notice to take it immediately after the child is born or placed with the family for adoption.

Employees will remain employed whilst on parental leave and will be entitled to receive all their normal benefits (other than pay).

Galtec may ask for evidence from an employee regarding parental leave entitlement.

FLEXIBLE WORKING POLICY

All employees with at least 26 weeks' continuous service have a legal right to request to work flexibly.

The law does not provide an *automatic* right to work flexibly as there may be circumstances when the company is unable to accommodate the employee's desired work pattern. However, the policy and procedure set out below aims to facilitate discussion and encourage both the employee and the company to consider flexible working patterns.

Prior to making a request employees are asked to think carefully about their desired working pattern and the implications for both them and the company

when making an application. In return the company will follow a reasonable procedure to ensure that all requests are given full consideration.

In order to make a request for flexible working an individual must:

- be an employee (as opposed to an agency or contract worker)
- have worked for the company continuously for 26 weeks at the date the application is made

An employee can only make a statutory request once in any 12 month period. Applications will not be considered if the employee has made another application to work flexibly during the past 12 months.

Eligible employees may request:

- a change to the hours worked
- a change to the times required to work
- a change to the place of work

This covers changes to working patterns such as annualised hours, compressed hours, flexitime, home working, job-sharing, self-rostering, shift working, staggered hours and term-time working. The requested change in working pattern need not always require a significant alteration. For example, an employee may simply wish to start work half an hour later to facilitate other commitments.

PROCEDURE

The employee must make an application in writing to a Director. Only one application can be made within a 12-month period and an accepted application will mean a **permanent** change to the employee's terms and conditions of employment. Therefore it is important that the employee has given careful consideration to their requested working pattern and any financial implications it might have if the new arrangements involve a drop in salary.

The application must set out:

- whether a previous application has been made and became effective and if so when
- the change to working conditions sought, including desired date of effect
- an explanation as to what effect the change may have on the company and how this might be dealt with

A meeting will be arranged as soon as is reasonably possible to discuss the request. It will also provide an opportunity to consider other alternative working

patterns should there be problems in accommodating the desired work pattern outlined in the application. The employee may, if they wish, bring a colleague to the meeting.

(If it is felt that the request can be granted immediately, then a meeting may not be necessary).

The request will be considered carefully looking at the benefits and weighing these against any adverse business impact at the time of the request as outlined in the following criteria:

- burden of additional cost
- inability to reorganise work amongst existing staff
- detrimental effect on Galtec's ability to meet customer demands
- inability to recruit additional staff
- detrimental impact on quality or performance
- health and safety implications
- whether there will be enough work to do during the requested working periods
- planned structural changes

The company will write to the employee following the meeting to either agree to a new work pattern and a start date; or to provide clear business ground(s) as to why their application cannot be accepted and the reasons why the ground(s) apply in the circumstances.

An employee has the right to appeal the decision. Any appeal should be made in writing to a Director, setting out the reasons and grounds for the appeal. A meeting will be arranged to hear the appeal. The employee may, if they wish, bring a colleague to the meeting. A final decision, with detailed reasons, will be given in writing following the appeal meeting. (If it is felt that the appeal can be granted immediately, then an appeal meeting may not be necessary). The decision of the appeal will be final.

All requests, including appeals, will be considered and decided upon in a reasonable manner and in any case within a period *no longer than* 3 months from first receipt, however this time period may be extended by mutual agreement: This may be necessary, for instance, if the company cannot agree to the initial request, but a compromise may be possible which requires further discussion and exploration.

If the employee fails to attend either the initial meeting to discuss the application, or any appeal meeting, and then subsequently fails to attend a

rearranged meeting without good reason, the request will be considered withdrawn. The employee will be notified in this event.

In certain circumstances, a trial period may take place by agreement. At the end of the trial period a discussion would take place as to whether the arrangements should continue as permanent or whether the employee should revert to the previous working arrangement. If the company decides as a result of the trial period that the revised working pattern is unworkable then it will issue a decision stating the business grounds and the reasons why the grounds apply. The employee would have the right of appeal following this. There may also be circumstances where the company has reasons to reject a permanent change but is able to agree to a change for a specific period of time.

5) WORKING HOURS

OVERTIME POLICY

Employees may from time to time be required to work outside of their normal hours of work to meet the needs of the Company's business. Some roles, including all site-based operatives, may be entitled to receive payment for additional hours worked over and above their normal working hours.

Entitlement to paid overtime will be stated in contracts of employment and will be paid as follows:

Monday to Friday	1 x basic hourly rate
Saturday and Sunday	1.5 x basic hourly rate *
Bank Holiday	1.5 x basic hourly rate plus 1 day off in lieu *

* This rate of overtime will only be paid once normal full time weekly working hours have been exceeded

Any hours worked over a part-time employee's contracted hours up to full time weekly equivalent hours will be paid at the basic hourly rate, and thereafter as above.

All paid overtime must be authorised in advance by a Contracts Manager or a Director.

There is no contractual right to overtime working.

ALTERNATIVE WORKING PATTERNS

The company reserves the right to adopt alternative hours of work as is customary for the building industry during winter. This may involve a reduction in weekly working hours or an alternative working pattern during UK Winter Time months in response to health, safety and welfare requirements.

It may also be necessary to adopt alternative hours or patterns of work in response to limitations imposed by regulatory requirements. Similarly in the case of adverse weather/temperature where to work may have health, safety and welfare implications or may result in sub-standard performance or damage to company or customer property.

In such circumstances, the employee may be given the opportunity to take either annual leave or unpaid leave.

6) PERFORMANCE APPRAISAL

Galtec recognises the importance of helping people to reach their full potential and give of their best. Key to this is the managing and developing of individual and team performance which the company encourages as an ongoing activity on a day to day basis. Whilst the company currently has no formal appraisal procedure, relevant training and development needs will be assessed and identified on an ongoing basis and any concerns about poor performance will be addressed through the Capability procedure.

7) HEALTH AND SAFETY

(Employees are referred to the separate company Health, Safety and Environmental Policy document)

8) COMPANY VEHICLE POLICY

The following must be read in conjunction with the 'Policy for driving Company vehicles' contained within the Company's Health, Safety and Environmental Policy document. Failure to comply with these requirements may result in disciplinary action.

Drivers must be a minimum of 21 years of age unless authorized by a director.

Drivers must hold a full current UK driving licence valid for the category of vehicle being driven, a copy of which must be provided and will be held on the employee's personnel file. Drivers will be required to give consent for the company to enquire about their Driver Record Information from the DVLA.

Drivers are required at all times to drive in a safe, responsible and competent manner, be courteous to other drivers, and to abide by UK road traffic laws.

It is an absolute requirement that employees never drive a Company vehicle whilst under the influence of alcohol or any narcotic substance.

Drivers must ensure that the Company vehicle is maintained in good and serviceable working order, kept free of damage or abnormal wear and tear, and cleaned on a regular basis.

Drivers are responsible for the safe keeping of the vehicle itself and any Company equipment or property that may be contained in the vehicle.

Drivers must at all times take all reasonable steps to ensure that the motor vehicle is kept secure and locked when unattended. In circumstances in which the Company concludes that an employee has been negligent or reckless in failing to keep the vehicle secure they will be liable to the Company for any loss suffered.

Drivers are required to notify the Company of any accidents, breakdowns, or damage to a Company vehicle.

Drivers will be responsible for payment of all fines incurred for traffic offences and parking fines

Employees are not permitted to use any Company motor vehicle outside the United Kingdom without prior written authority from the Company.

Employees are not permitted to use any Company motor vehicle in the course of any business or commercial activity other than that of the Company.

9) EXPENSES POLICY

Claims for expenses occurred for legitimate business purposes should be properly documented via a Business Expense Form (available from the Finance department) and supported by receipts. If staff are unsure about what expenses can be claimed they should seek clarification from their immediate supervisor/manager or from the Finance Department.

10) DATA PROTECTION POLICY

Galtec takes the security and privacy of its employees' data seriously. The company needs to gather and use information or 'data' about its employees as part of the business and to manage the employment relationship. Galtec intends to comply with its legal obligations under the Data Protection Act 2018 (the '2018 Act') and the EU General Data Protection Regulation ('GDPR') in respect of data privacy and security.

This policy applies to current and former employees, workers, volunteers, apprentices and consultants. It also includes external job applicants to the extent the provisions are applicable. Those who fall into one of these categories are known as 'data subjects' for the purposes of this policy. The company has separate policies and privacy notices in place in respect of customers, suppliers and other categories of data subject. A copy of these can be obtained from a Director.

Galtec is a 'data controller' for the purposes of employees' personal data. This means that the company determines the purpose and means of the processing of such data.

This policy explains how the company will hold and process employee information. It explains an employee's rights as a data subject. It also explains employee's obligations when obtaining, handling, processing or storing personal data in the course of working for, or on behalf of, the company.

It is intended that this policy is fully compliant with the 2018 Act and the GDPR. If any conflict arises between those laws and this policy, the Company intends to comply with the 2018 Act and the GDPR.

PRINCIPLES

Personal data must be processed in accordance with six 'Data Protection Principles.' It must:

- be processed fairly, lawfully and transparently;
- be collected and processed only for specified, explicit and legitimate purposes;
- be adequate, relevant and limited to what is necessary for the purposes for which it is processed;
- be accurate and kept up to date. Any inaccurate data must be deleted or rectified without delay;
- not be kept for longer than is necessary for the purposes for which it is processed; and
- be processed securely.

Galtec are accountable for these principles and must be able to show compliance.

DEFINITION OF PERSONAL DATA

'Personal data' means information which relates to a living person who can be identified from that data (a 'data subject') on its own, or when taken together with other information which is likely to come into the company's possession. It includes any expression of opinion about the person and an indication of the intentions of Galtec or others, in respect of that person. It does not include anonymised data.

This policy applies to all personal data whether it is stored electronically, on paper or on other materials.

This personal data might be provided to the company by the subject, or someone else (such as a former employer, doctor, or a credit reference agency), or it could be created by the company. It could be provided or created during the recruitment process or during the course of the contract of employment (or services) or after its termination. It could be created by supervisors/managers or other colleagues.

Galtec may collect and use the following types of personal data about its employees:

- recruitment information such as application forms and CVs, references, qualifications and membership of any professional bodies and details of any pre-employment assessments;
- name, address, contact details and date of birth;
- the contact details for emergency contacts;
- gender;
- marital status and family details;
- information about the contract of employment (or services) including start and end dates of employment, role and location, working hours, details of promotion, salary (including details of previous remuneration), pension, benefits and holiday entitlement;
- bank details and information in relation to tax status including national insurance number;
- identification documents including passport and driving licence and information in relation to immigration status and right to work for the company;
- information relating to disciplinary or grievance investigations and proceedings involving the employee (whether or not they were the main subject of those proceedings);
- information relating to performance and behaviour at work, including appraisals;
- training records;
- details of periods of leave taken;

- electronic information in relation to use of IT systems/swipe cards/telephone systems;
- images (whether captured on CCTV, by photograph or video); and
- any other category of personal data which we may notify employees of from time to time.

How we define special categories of personal data

'Special categories of personal data' are types of personal data including information as to:

- racial or ethnic origin;
- political opinions;
- religious or philosophical beliefs;
- trade union membership;
- genetic or biometric data;
- health;
- sexual orientation; and
- any criminal convictions and offences.

We may hold and use any of these special categories of employees' personal data in accordance with the law.

PROCESSING PERSONAL DATA

'Processing' means any operation, which is performed on personal data such as:

- collection, recording, organisation, structuring or storage;
- adaption or alteration;
- retrieval, consultation or use;
- disclosure by transmission, dissemination or otherwise making available;
- alignment or combination; and
- restriction, destruction or erasure.

This includes processing personal data which forms part of a filing system and any automated processing.

The company will process employees' personal data (including special categories of personal data) in accordance with our obligations under the 2018 Act.

Galtec will use employees' personal data for:

- performing the contract of employment (or services);
- complying with any legal obligation; or
- if it is necessary for the company's legitimate interests (or for the legitimate interests of someone else). However, Galtec can only do this if the subject's interests and rights do not override the company's (or theirs). Employees have the right to challenge the legitimate interests and request that Galtec stop this processing. See details of rights below.

Galtec can process employees' personal data for these purposes without their knowledge or consent. The company will not use personal data for an unrelated purpose without telling the employee about it and the legal basis that it is intended to rely on for processing it.

If an employee chooses not to provide the company with certain personal data they should be aware that the company may not be able to carry out certain parts of the contract between the two parties. For example, if bank account details are not provided payment may not be able to be made. It might also stop the company from complying with certain legal obligations and duties held such as to pay the right amount of tax to HMRC or to make reasonable adjustments in relation to any disability the employee may suffer from.

Examples of when personal data might be processed

The company has to process employees' personal data in various situations during recruitment, employment (or engagement) and even following termination of employment (or engagement).

For example:

- to decide whether to employ (or engage) an individual;
- to decide how much to pay, and the other terms of the contract;
- to check the legal right to work;
- to carry out the contract between the two parties including where relevant, its termination;
- training and reviewing performance*;
- to decide whether to make a promotion;
- to decide whether and how to manage performance, absence or conduct*;
- to carry out a disciplinary or grievance investigation or procedure in relation to the employee or someone else;
- to determine whether reasonable adjustments to workplace or role need to be made because of a disability*;
- to monitor diversity and equal opportunities*;
- to monitor and protect the security (including network security) of the company, of employees, customers and others;

- to monitor and protect the health and safety of employees, customers and third parties*;
- to pay and provide pension and other benefits in accordance with the contract*;
- to pay tax and national insurance;
- to provide a reference upon request from another employer;
- to pay trade union subscriptions*;
- to monitor compliance with our policies and our contractual obligations*;
- to comply with employment law, immigration law, health and safety law, tax law and other laws which affect the company*;
- to answer questions from insurers in respect of any insurance policies which relate to employees*;
- to run the business and plan for the future;
- the prevention and detection of fraud or other criminal offences;
- to defend the company in respect of any investigation or litigation and to comply with any court or tribunal orders for disclosure*; and
- for any other reason which we may notify employees of from time to time.

Galtec will only process special categories of personal data (see above) in certain situations in accordance with the law. For example, this can be done if explicit consent is given. If the company asks for consent to process a special category of personal data then the reasons for the request will be given. Consent does not need to be given and can be withdrawn later by contacting the Director of Finance.

Galtec does not need consent to process special categories of personal data when it is being processed for the following purposes:

- where it is necessary for carrying out rights and obligations under employment law;
- where it is necessary to protect vital interests of the employee or those of another person where they are physically or legally incapable of giving consent;
- where the employee has made the data public;
- where processing is necessary for the establishment, exercise or defence of legal claims; and
- where processing is necessary for the purposes of occupational medicine or for the assessment of an employee's working capacity.

Special categories of personal data may be processed for the purposes above which have an asterisk beside them. In particular, Galtec will use information in relation to:

- race, ethnic origin, religion, sexual orientation or gender to monitor equal opportunities;

- sickness absence, health and medical conditions to monitor absence, assess fitness for work, to pay benefits, to comply with legal obligations under employment law including to make reasonable adjustments and to look after employees' health and safety; and
- trade union membership to pay any subscriptions and to comply with our legal obligations in respect of trade union members.

Galtec will only collect information about criminal convictions if it is appropriate given the nature of the role and where the company is legally able to do so. This will usually be where such processing is necessary to carry out obligations and provided it is done in line with the company's data protection policy.

The company does not take automated decisions about employees using personal data or use profiling in relation to employees.

SHARING PERSONAL DATA

Sometimes Galtec might share employees' personal data with group companies or contractors and agents to carry out obligations under the employment/services contract, where it is required by law or for our legitimate interests.

The company requires those companies to keep employees' personal data confidential and secure and to protect it in accordance with the law and the company policies. They are only permitted to process employees' data for the lawful purpose for which it has been shared and in accordance with the company's instructions.

Examples of the legitimate activities where personal data may be shared with and/or processed by third parties include:

- to obtain pre-employment references and checks including, where necessary, criminal records
- to satisfy insurance obligations e.g. for driving company vehicles
- administration of payroll, benefits, pensions, share plans and IT services
- provision of occupational health services
- making returns to HMRC, reports to HSE and disclosures to shareholders
- in the context of a sale or restructure of some or all of the business

Employees' data may be shared outside the European Economic Area in order to perform the contract or where there are associated companies that require the information for business purposes. Data is transferred outside the EEA on the basis of specific relevant safeguards eg declaration of adequacy. This means that the country/ies to which Galtec transfers personal data are deemed to provide an adequate level of protection for personal information.

EMPLOYEE'S RESPONSIBILITIES FOR PROCESSING PERSONAL DATA FOR THE COMPANY.

Everyone who works for, or on behalf of, Galtec has some responsibility for ensuring data is collected, stored and handled appropriately, in line with this and any related policies.

Employees should only access personal data covered by this policy if it is needed for the work they do for, or on behalf of the company and only if they are authorised to do so. Employees should only use the data for the specified lawful purpose for which it was obtained.

Employees should keep personal data secure and not share it with unauthorised people. Personal data should not be saved to employees' own personal computers or other devices and should not be shared informally. Personal data should not be taken away from the company's premises without authorisation from a Director.

Employees should not make unnecessary copies of personal data and should keep and dispose of any copies securely. Drawers and filing cabinets should be locked and paper with personal data should not be left unattended. Computer screens should be locked when desks are unattended. Personal data should be shredded and disposed of securely when it is finished with.

Personal data should be encrypted before being transferred electronically to authorised external contacts. Strong passwords should be used. Employees should consider anonymising data or using separate keys/codes so that the data subject cannot be identified. Personal data should never be transferred outside the European Economic Area except in compliance with the law and authorisation of the Director of Finance.

Employees should regularly review and update personal data, which they have to deal with for work. This includes telling the company if their own contact details change.

Any deliberate or negligent breach of this policy may result in disciplinary action in accordance with the company's disciplinary procedure. It is a criminal offence to conceal or destroy personal data, which is part of a subject access request (see below). This conduct would also amount to gross misconduct under our disciplinary procedure, which could result in dismissal.

The company's Data Protection Manager (the Director of Finance) is responsible for reviewing this policy and updating the Board of Directors on the company's data protection responsibilities and any risks in relation to the processing of data. Employees should ask for help from the Director of Finance if they are unsure about data protection or this policy, or notice any areas of data protection or security the company can improve upon.

Data breaches

The company has robust measures in place to minimise and prevent data breaches from taking place. Should a breach of personal data occur then a strict procedure must be followed. If the breach is likely to result in a risk to the rights and freedoms of individuals then the company must also notify the Information Commissioner's Office within 72 hours. If employees become aware of a data breach, they must contact a Director immediately and keep any evidence they have in relation to the breach.

EMPLOYEES' DATA SUBJECT RIGHTS

Employees have the right to the following:

- to receive information about what personal data Galtec processes, how and on what basis as set out in this policy;
- to access their own personal data by way of a subject access request (see below);
- to object to data processing where the company is relying on a legitimate interest to do so and the employee thinks that their rights and interests outweigh those of the company;
- to object to processing personal data for the purposes of direct marketing;
- to receive a copy of their own personal data and to transfer it to another data controller. There will be no charge for this and the aim will be to do this within one month;
- to be notified of a data security breach concerning their personal data;
- to correct any inaccuracies in their personal data;
- to request erasure of personal data where there is no entitlement under the law to process it or it is no longer necessary to process it for the purpose it was collected.

While a request for correction or erasure is being made or the lawfulness of the processing is being contested, an application can be made for its use can be made

With some exceptions, employees have the right not to be subjected to automated decision-making.

In most situations, Galtec will not rely on employees consent as a lawful ground to process their data. If the company does however request consent to the processing of personal data for a specific purpose, employees have the right not to consent or to withdraw their consent later. To withdraw such consent, employees should contact the Director of Finance.

Employees should contact the Director of Finance to exercise any of the rights and requests listed above.

Employees have the right to complain to the Information Commissioner. This can be done by contacting the Information Commissioner's Office directly. Full contact details including a helpline number can be found on the Information Commissioner's Office website (www.ico.org.uk). This website has further information on rights and obligations.

Subject access requests

Data subjects can make a 'subject access request' ('SAR') to find out the information Galtec holds about them. This request must be made in writing to the Director of Finance who will coordinate a response. The company must respond within one month unless the request is complex or numerous in which case the response period can be extended by a further two months.

There is no fee for making a SAR. However, if the request is manifestly unfounded or excessive the company may charge a reasonable administrative fee or refuse to respond to the request.

11) Anti-Bribery and Corruption Policy

It is Galtec's policy to conduct all of its business in an honest and ethical manner. The company takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all business dealings and relationships wherever the company operates as well as implementing and enforcing effective systems to counter bribery.

The company will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which it operates. However, the Company remains bound by the laws of the UK, including the Bribery Act 2010, in respect of its conduct both at home and abroad.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if the company is found to have taken part in corruption it could face an unlimited fine, be excluded from tendering for contracts and face damage to its reputation. The company therefore takes its legal responsibilities very seriously.

In this policy, 'third party' means any individual or organisation an employee comes into contact with during the course of their work for the company, and includes actual and potential customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

This policy applies to all individuals working at Galtec irrespective of role or level and includes permanent and temporary staff, contractors, volunteers and those who undertake marketing, promotion or distribution on behalf of the company, or any other person associated with the company (collectively referred to as 'workers' in this policy).

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

Under the Bribery Act 2010 it is an offence to:

- Offer, promise or give a bribe (even if it is not accepted);
- Request, agree to receive, or accept a bribe;
- Bribe of foreign public official; and/or
- Fail to prevent bribery by any person performing services on Galtec's behalf

Procedure

Gifts and hospitality

This policy does not prohibit normal and appropriate hospitality or token gifts (given and received) to or from third parties.

The giving (or receipt) of gifts or hospitality is *not* prohibited, if the following requirements are met:

- it may not be construed as being an offer of inducement or bribery to influence a business transaction, or in explicit or implicit exchange for favours or benefits
- it complies with local law;
- it is given in the company's name, not in a worker's;
- it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- it is appropriate in the circumstances. For example, in the UK it is customary for small gifts to be given at Christmas time;
- taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;
- it is given openly, not secretly; and
- gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of a Director.

All workers must report to the Director of Finance any offer of gifts or services by customers, suppliers, distributors and any other such persons having a similar connection with the company. Workers must not accept or agree to accept such offers (where the value exceeds £50) without the prior written agreement of the Director of Finance.

It is appreciated that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered. A worker who is in any doubt about the appropriateness of giving or receiving a gift should consult their manager.

What is not acceptable?

It is not acceptable for a worker (or someone on their behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;

- accept payment from a third party that a worker suspects is offered with the expectation that it will obtain a business advantage for them;
- accept a gift or hospitality from a third party if the worker knows or suspects that it is offered or provided with an expectation that a business advantage will be provided by the company in return;
- threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy.

Facilitation payments and kickbacks

Galtec does not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. They are not commonly paid in the UK, but are common in some other jurisdictions in which the company may operate.

If a worker is asked to make a payment on behalf of the company, they should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. They should always ask for a receipt which details the reason for the payment. If a worker has any suspicions, concerns or queries regarding a payment, they should raise these with their manager.

Kickbacks are typically payments made in return for a business favour or advantage. All workers must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by the company.

Donations

Galtec does not make contributions to political parties. The company only makes charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of a Director.

Worker's Responsibilities

It is the duty and responsibility of all Galtec workers to take whatever reasonable steps are necessary to ensure compliance with this policy and to prevent, detect and report any suspected bribery or corruption. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Workers must notify their manager as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if a customer or potential customer offers the worker something to gain a business advantage with the company, or indicates to a worker that a gift or payment is required to secure their business.

Any worker who breaches this policy will face disciplinary action, which could result in dismissal on the grounds of gross misconduct. The company reserves the right to terminate its contractual relationship with third parties if they breach this policy. The company is also committed to reporting matters to appropriate external government departments, regulatory agencies, or the police where appropriate.

Record-Keeping

The company will keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

Workers must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.

Workers must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with the company's expenses policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as customers, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

Raising a Concern

Workers are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If they are unsure whether a particular act constitutes bribery or corruption, or if they have any other queries, these should be raised with the worker's manager or a Director.

It is important that a worker informs their manager as soon as possible if they are offered a bribe by another party, are asked to make one, suspect that this may happen in the future, or believe that they are a victim of another form of unlawful activity.

Any knowledge or suspicion that another worker has plans to offer, promise or give a bribe, or to request, agree to or accept a bribe in connection with Galtec's business should immediately be reported to a Director or to the Chairperson of the Board of Directors.

Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrong doing, are sometimes worried about possible repercussions. The company aims 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.

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

12) MODERN SLAVERY AND HUMAN TRAFFICKING

Introduction

Modern slavery is the illegal exploitation of people for personal or commercial gain, often in horrendous conditions which the victim cannot escape. Businesses have a key part to play in the effort to tackle this crime and protect vulnerable workers from exploitation.

At Galtec we recognise that slavery and human trafficking are significant human rights issues and are committed to taking appropriate and proportionate steps to mitigate the risk of these occurring within our business and supply chain. We do not want to be knowingly or unknowingly complicit in this crime and believe as a business we should act responsibly, so although we do not meet the transparency requirements of the Modern Slavery Act 2015 we choose to voluntarily produce this statement outlining our approach to tackling modern slavery and protecting vulnerable workers.

The Board of Directors is responsible for the contents of this statement that will be reviewed and updated as necessary. The Board also oversees procedures to prevent modern slavery and ensure that risks are properly investigated across our operations in line with general business risk management and governance.

Our business

Galtec was established in 1988 by Tony and Terry Galvin and continues to operate by the family values instilled by the brothers. Founded on long term relationships we have a reputation for delivering a quality product based on a fair and reliable service, and believe in treating all our stakeholders in a fair and respectful manner. We will not tolerate illegal practices in our own business or in our supply chains.

Galtec's main focus is the provision of groundworks and civil engineering services for leading house builders and property developers in the UK. We also have an evolving small works business and an in-house training centre. As a medium-sized company operating regionally within the construction industry, the key areas of our operation that could be affected by slavery and human trafficking are our directly hired employees, agency workers working on our behalf, subcontractor operatives working on site with us, and the workforce of our supply chain who supply materials to our business.

Our Policies

We treat all of our stakeholders, including employees, suppliers, subcontractors, business partners and customers in a fair and respectful manner and uphold all basic human rights. Galtec is committed to creating an environment of equality, dignity and respect that promotes open communication and allows for free discussions of any work related problems. All workers, suppliers and subcontractors are encouraged to raise any concerns or

suspicions at the earliest possible stage and without fear of detrimental treatment.

We outline expectations of behaviour in our staff Code of Conduct and have a number of policies in place that underpin our commitment to operating ethically including Equality and Diversity, Dignity at Work, Grievance, Health and Safety, Data Protection and Anti-bribery and corruption. All of these policies were reviewed and updated, or introduced, as part of the roll-out of our Staff Handbook in 2018.

Our Procedures

Our own business

We do not employ anyone below the age of 16 in any of our business operations, including on our sites. As a reputable UK business, we ensure that as a minimum we comply with all relevant employment legislation, including legislation upholding minimum pay levels, legally mandated benefits, working conditions and working hours. We make employees aware of their terms and conditions of employment via contracts of employment which were reviewed and updated in 2018.

We verify that all employees have the right to work in the UK upon commencement of employment. We use employment agencies infrequently and when we do we typically engage with a local office of a reputable national business who warrant they have procedures for ensuring that labour supplied are eligible to work in the UK.

We ensure employees' bank account details provided for payment of wages matches the name of the employee and where there are discrepancies, or where an alternative arrangement is requested, we seek supportive evidence to ensure the employee is not subject to modern slavery.

The Board of Directors, who are responsible for understanding and overseeing general business risk prevention and remediation, are committed to self-development to enhance their individual and collective skills and knowledge. To this effect a number of Director training events were delivered during 2018 with more still planned. The Board is further strengthened by a non-executive Director acting as Chair and by an independent Adviser to the Board who is retained on an ongoing basis.

Our suppliers and subcontractors

All of our suppliers and subcontractors are either UK entities or are UK offices of large international companies. We look to develop long term and mutually beneficial relationships with our suppliers, built on respect and honesty. In many cases we are required to procure products via our clients' nominated suppliers as part of the agreed trading terms.

We procure all of our directly sourced materials from UK based organisations that are required to comply with UK laws on forced labour. We understand that the majority of goods we buy are produced either in the UK or in jurisdictions that have well established frameworks for stakeholder protections. However it is possible that a small number of goods we purchase or components within goods we buy originate from geographies that do not have such well-established frameworks. We do not condone the sale and use of materials that have been obtained or manufactured from an illegal or unauthorised source.

We do not knowingly make demands of suppliers or sub-contractors that might lead them to violate human rights, for example incentivising (whether directly or via our Buying staff performance measures) short turnaround production/delivery of materials, or procurement of the lowest cost products.

Looking forwards

At Galtec we recognise the need to continue to improve our understanding of the risk of modern slavery within our business and supply chain. As part of our commitment to this, and to improving our mitigation, the Board of Directors has identified the following areas of focus going forward:

Introducing more rigor with regard to the selection and due diligence of suppliers of directly-sourced materials, particularly where we are procuring outside of our client's nominated supplier list, and where they are supplying raw materials that may be sourced from outside of the UK

Increasing awareness of the risks of modern slavery by relevant members of staff, particularly those involved in supply chain management

Introducing more rigor with regard to the selection and due diligence of subcontractor's with respect to both provision of labour and the purchase of materials for use on our sites

Ensuring *all* employment agencies with whom we engage have satisfactory procedures for ensuring that labour supplied are eligible to work in the UK and that they comply with relevant employment legislation.

Introducing a Whistleblowing policy and information for staff about the Modern Slavery Helpline

We also recognise the benefit of working collaboratively with others, including industry bodies, our clients and our supply chain to improve industry-wide labour standards and will embrace opportunities to do so.

13) WHISTLE-BLOWING POLICY

Galtec is committed to the highest possible standards of openness, probity and accountability and seeks to conduct its affairs in a responsible manner.

The Public Interest Disclosure Act 1998, is an Act which protects employees and/or workers who 'blow the whistle' about wrongdoing. It gives legal protection to employees and/or workers against being dismissed or penalised by their employer as a result of disclosing certain serious concerns provided that they are disclosed under procedures identified below. It is a fundamental term of every contract of employment that an employee and/or worker will faithfully serve his or her employer and not disclose confidential information about the employer's affairs. However, where an individual discovers information that they reasonably believe shows malpractice/wrongdoing within their work environment (and it is in the public interest) then they should be able to speak out without fear of reprisal or unfair treatment.

Normally any concern about a workplace situation should be raised with the employee's immediate manager. This means that problems can be identified and resolved quickly within the Company. It is recognised, however, that because of the seriousness and sensitivity of some issues, together with the knowledge of who the employee and/or worker thinks may be involved in wrongdoing, this may be difficult or even impossible, and therefore it may be necessary for the disclosures to be made independently of line management.

It should be emphasised that this policy is intended to assist employees and/or workers (including volunteers) who believe they have discovered malpractice or serious wrongdoing provided that they make the disclosure in accordance with the policy. In so doing, it seeks to protect employees and/or workers from reprisal.

SCOPE OF POLICY

This policy is intended to meet the requirements of the Public Interest Disclosure Act 1998. It is not designed to question financial or business decisions taken by the Company nor may it be used to raise any personal grievance or reconsider matters that have already been addressed under harassment, health and safety, grievance or disciplinary procedures (unless it is in the public interest). Nor is it to be used for the personal gain of the employee and/or worker in making a disclosure. Individuals who make disclosures outside the arrangements set out here will not be protected under this policy and may not be protected under the Act.

This policy is intended to cover incidents that are in the public interest that, happened in the past, is happening now or is believed will happen in the near future.

They might include:

- A criminal offence or a breach of law
- Health and safety risks, including risks to third parties as well as colleagues
- Risk of or actual damage to the environment
- A miscarriage of justice, or cover up of wrongdoing
- Any form of unethical conduct

This is not intended to be a comprehensive list and any matters raised under this policy will be considered seriously.

SAFEGUARDS

Protection

This policy is designed to offer protection to those employees/workers who disclose such concerns provided the disclosure is made:

- in accordance with the procedures laid down;
- in good faith;
- in the reasonable belief of the individual that the information, and any allegation it contains, is substantially true; and
- in the reasonable belief of the individual making the disclosure that it tends to show one or more of the offences or breaches listed above ('a relevant failure').

Confidentiality

Galtec will treat all such disclosures in a confidential and sensitive manner. Every effort will be made to keep the identity of the individual making the allegation confidential so long as it does not hinder or frustrate any investigation. However, the individual making the disclosure may need to provide a statement as part of the evidence required.

Anonymous Allegations

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less powerful, but they will be considered at the discretion of the Company.

In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the issues raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from alternative credible sources.

Untrue allegations

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. The individual must show that he/she held the belief, and that it was a reasonable belief in the circumstances at the time of disclosure. If, however, the investigation shows that an individual has made malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against the individual concerned.

MAKING A DISCLOSURE

Galtec is committed to taking all concerns raised under this policy seriously and to treating any team member who makes a disclosure with respect and dignity.

Concerns should be raised either verbally or in writing in accordance with the procedure outlined below. Galtec will investigate concerns raised internally and assess what action, if any, should be taken. The individual will be informed of who will be handling the matter, the anticipated timescales for response, and whether their assistance is needed – this may include asking them how they think the matter might best be resolved. The individual will be advised on progress and will be provided with feedback where this does not infringe upon the confidentiality and data protection rights of others.

It is important that an employee and/or worker who makes a disclosure keeps an accurate record of their concerns and the steps they have taken to resolve them. The record of events should be factual and not influenced by personal opinions or feelings. A record of any written or verbal communication sent or received, whether as a result of an internal or external disclosure should also be kept.

PROCEDURE

- Raising a concern internally

Concerns should be raised internally with the Director of Finance in the first instance and as soon as possible after the concern has arisen. If the employee/worker feels unable to do this, or the disclosure is about the Director of Finance, then this should be raised with another Director in the business.

- Escalating a concern internally

If the concern has been raised with a Director but the employee/worker feels it has not been addressed in a reasonable timeframe, or is not satisfied with the response, they should escalate their concerns to the Non-Executive Director.

- Raising or escalating a concern to a regulator

Employees and/or workers are encouraged to use the Company's internal procedures for making a disclosure. If, however, the individual feels their

concern has not been addressed in reasonable time or feels unable to raise their concern at any level in the Company they can raise their concern outside of work. This should be with a prescribed person or body that has the authority to investigate, such as the Health and Safety Executive. A list of prescribed bodies can be found at www.gov.uk the employee/worker may also make a disclosure to their legal adviser or MP. Advice and support may be sought from the individual's professional association or trade union. If they haven't already, the individual is encouraged to inform the Company of their actions.

- Raising or escalating a concern externally – going public

An employee/worker considering 'going public' with a concern should seek advice from their professional association or trade union before taking action. Without clear evidence of first raising the concern internally or with a regulator, this action would only be considered appropriate and protection provided under the terms of Public Interest Disclosure Act (PIDA) in the most extreme circumstances. In particular, careful consideration should be given as to whether such a disclosure might then breach the confidentiality and rights of others.

HELP AND ADVICE

There may be times when employees and/or workers are not sure whether to raise concerns about practices or behaviour. There are a number of possible sources of help including:

- Colleagues
- The Board of Directors
- Their professional association
- Protect, formerly Public Concern at Work

There is a range of further sources of information and advice including those listed below.

Useful contacts:

Protect, formerly Public Concern at Work - www.pcaw.org.uk, Helpline: 020 3117 2520

Health and Safety Executive: www.hse.gov.uk , Helpline: 0300 0031647

The Competition and Markets Authority:
www.gov.uk/government/organisations/competition-and-markets-authority,
Cartels hotline: 0800 085 1664

Construction Industry Council: www.cic.org.uk, Hotline: 020 3738 6000

Modern Slavery Helpline: www.modernslaveryhelpline.org, Hotline: 08000 121700.