



Concrete Cutting • Robotic Demolition • Hydro Demolition

Unit 7 • Concord Business Centre • Concord Road • Acton • London • W3 0TJ

020 8961 0800

office@edd.ltd

WWW.EDD.LTD

Ethical Code of Practice

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12 Jan 2022

Keith Morrow

Managing Director

Managing Director: Keith Morrow

Registered office: Batchworth House, Batchworth Place, Church Street, Rickmansworth WD3 1JE

Registered Number: 2279698 VAT No: 532 4046 77

Ethical Conduct Policy

At Euro Diamond Drilling LTD we are committed to doing the right thing in all aspects of our business. This requires that every day everyone working for us needs to have an unwavering dedication to the highest ethical standards. It is fundamental that every employee and worker carries a share of the responsibility for our conduct and contributes to our success.

Our culture is built on four key values. These shape our behaviour toward customers and toward one another. Together, they drive our organisation forward. The values are:

INTEGRITY

We demand of each other and ourselves the highest standards of individual and corporate integrity. We do the right thing, because it is the right thing to do. It is every employee's responsibility to safeguard organisation assets and foster an environment of trust with our -workers, customers, communities and suppliers. We should always comply with all our organisation policies, meet legal requirements, and create an environment of transparency in which all reporting requirements are met.

EXCELLENCE

We routinely challenge ourselves to improve our products, services and processes. We strive always to understand our customers' businesses and help them achieve their goals. We serve our customers by anticipating and responding to their needs. We are dedicated to diversity, fair treatment, mutual respect and trust. We are committed to producing products and serving our customers with zero harm to people and the environment.

TEAMWORK

We foster an environment that encourages innovation and creativity, and delivers results through collaboration. We practice leadership that teaches, inspires and promotes full participation and career development. We encourage open and effective communications and interaction with all workers and stakeholders, actively working together to keep each other safe and in good health. We believe that none of us is as capable or effective as all of us – and together, there's no limit to what we can achieve.

ACCOUNTABILITY

We honour the commitments we make and take personal responsibility for all actions and results. Our actions match our words, and we demand responsibility – from ourselves and others – in everything we do. We operating on the basis that continuous improvement is an integral part of our culture.

Regardless of our position within the organisation, we share equal accountability for:

- Conducting business with integrity, preserving our strong reputation and expanding our position in the marketplace.
- Fostering an inclusive culture in which we all feel respected and have the opportunity to reach our full potential.
- Providing a healthy and safe work environment, and complying with applicable environmental laws and regulations wherever we operate around the world contributing to the sustainability of the communities in which we live and work.

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Child Labour

The Company will ensure that all relevant legislation and restrictions are adhered to in regards to the use of young workers. We will ensure that the necessary checks are carried out to verify an individual's age and right to work, and that relevant Health and Safety codes are adhered to.

Where required, the Company will ensure that the relevant employment permit is received from the education department of the local council.

We will also carry out spot checks when required and will retain copies of age records within the place of work.

RESTRICTIONS FOR CHILDREN AGED 14 YEARS OLD

There are restrictions that apply to the employment of children aged 14 years old, as follows:-

- You must not work before 7.00 am. or after 7.00 pm. on any day;
- You must not work for more than 2 hours on any day when you are required to be at school;
- You must not work during school hours;
- You must not work for more than 5 hours on a Saturday or on weekdays during school holidays;
- You must not work for more than 2 hours on a Sunday;
- You must not work for more than 4 hours in any day without a rest break of 1 hour.
- You must not work for more than 12 hours in any school week; and
- You must not work for more than 25 hours a week during school holidays.

RESTRICTIONS FOR CHILDREN AGED 15 AND 16 YEARS OLD

There are restrictions that apply to the employment of children aged 15 and 16 years old, as follows:-

- You must not work before 7.00 am. or after 7.00 pm. on any day;
- You must not work for more than 2 hours on any day when you are required to be at school;
- You must not work during school hours;
- You must not work for more than 8 hours on a Saturday or on weekdays during school holidays;
- You must not work for more than 2 hours on a Sunday;
- You must not work for more than 4 hours in any day without a rest break of 1 hour.
- You must not work for more than 12 hours in any school week; and
- You must not work for more than 35 hours a week during school holidays.

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RESTRICTIONS FOR YOUNG WORKERS OVER COMPULSORY SCHOOL LEAVERS AGE

There are restrictions that apply to the employment of young workers over compulsory school leaver's age, as follows:-

- You must not work for more than 8 hours a day;
- You must not work for more than 40 hours a week;
- You must not work for more than 4.5 hours in any day without a rest break of 30 minutes.
- You must have a rest period of not less than 48 hours in each seven day period.

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Anti-Bribery Policy

A) INTRODUCTION

Bribery is, in the conduct of the organisation's business, the offering or accepting of any gift, loan, payment, reward or advantage for personal gain as an encouragement to do something which is dishonest, illegal or a breach of trust.

Bribery is a criminal offence. The Organisation prohibits any form of bribery. We require compliance, from everyone connected with our business, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to us and we have a zero tolerance attitude towards corrupt activities of any kind, whether committed by Euro Diamond Drilling LTD employees or by third parties acting for or on behalf of Euro Diamond Drilling LTD.

B) OFFENCES

It is a criminal offence to:

- offer a bribe;
- accept a bribe;
- bribe a foreign official;
- as a commercial organisation, to fail to prevent a bribe.

You should be aware that if you are found guilty by a court of committing bribery, you could face up to 10 years in prison and/or an unlimited fine. The Organisation could also face prosecution and be liable to pay a fine.

C) PURPOSE

The purpose of this policy is to convey to all employees and interested parties of Euro Diamond Drilling LTD the rules of the Organisation in relation to our unequivocal stance towards the eradication of bribery and our commitment to ensuring that Euro Diamond Drilling LTD conducts its business in a fair, professional and legal manner.

D) DEFINITIONS OF BRIBERY AND CORRUPTION

Corruption is the misuse of office or power for private gain. Bribery is a form of corruption which means in the course of business:

- Giving or receiving money, gifts, meals, entertainment or anything else of value.
- As an inducement to a person to do something which is dishonest or illegal.

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E) SCOPE

This policy applies to all employees of Euro Diamond Drilling LTD, regardless of seniority or site. It also extends to anyone working for or on our behalf e.g. those engaged by us on a self-employed basis or an agency arrangement.

We will encourage the application of this policy where our business involves the use of third parties e.g. suppliers; contractors.

F) POLICY

It is prohibited, directly or indirectly, to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or organisation in order to gain commercial, contractual or regulatory advantage for the Organisation, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

It is also prohibited to act in the above manner in order to influence an individual in his capacity as a foreign public official. You should not make a payment to a third party on behalf of a foreign public official.

If you are offered a bribe, or a bribe is solicited from you, you should not agree to it unless your immediate safety is in jeopardy. You should immediately contact Keith Morrow so that action can be taken if considered necessary. You may be asked to give a written account of events.

If you, as an employee or person working on our behalf, suspect that an act of bribery, or attempted bribery, has taken place, even if you are not personally involved, you are expected to report this to Keith Morrow. You may be asked to give a written account of events.

Appropriate checks will be made before engaging with suppliers or other third parties of any kind to reduce the risk of our business partners breaching our anti-bribery rules.

The Organisation will ensure that all of its transactions, including any sponsorship or donations given to charity, are made transparently and legitimately.

Euro Diamond Drilling LTD takes any actual or suspected breach of this policy extremely seriously and will carry out a thorough investigation should any instances arise.

We will uphold laws relating to bribery and will take disciplinary action against any employee, or other relevant action against persons working on our behalf or in connection with us, should we find that an act of bribery, or attempted bribery, has taken place. This action may result in your dismissal if you are an employee, or the cessation of our arrangement with you if you are self-employed, an agency worker, contractor etc.

Staff are reminded of the Organisation's Whistleblowing Policy which is available in the Employee Handbook, or upon request.

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G) GIFTS AND HOSPITALITY

We realise that the giving and receiving of gifts and hospitality where nothing is expected in return helps form positive relationships with third parties where it is proportionate and properly recorded. This does not constitute bribery and consequently such actions are not considered a breach of this policy.

Gifts include money; goods (flowers, vouchers, food, drink, event tickets when not used in a hosted business context); services or loans given or received as a mark of friendship or appreciation.

Hospitality includes entertaining; meals or event tickets (when used in a hosted business context) given or received to initiate or develop relations. Hospitality will become a gift if the host is not present.

No gift should be given nor hospitality offered by an employee or anyone working on our behalf to any party in connection with our business without receiving prior written approval from Keith Morrow. Similarly, no gift nor offer of hospitality should be accepted by an employee or anyone working on our behalf without receiving prior written approval from Keith Morrow.

A record will be made of every instance in which gifts or hospitality are given or received.

As the law is constantly changing, this policy is subject to review and the Organisation reserves the right to amend this policy without prior notice.

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Anti-Tax Evasion Policy

A) INTRODUCTION

Tax evasion is a criminal offence. The Organisation prohibits any form of tax evasion. Involvement in the criminal facilitation of tax evasion exposes the Organisation and the person facilitating the evasion to a criminal offence. It will also damage our reputation and the confidence of our customers, suppliers and business partners.

Indicators of tax evasion are:-

- a) request for payment by cash;
- b) overly-complex payment mechanisms;
- c) services/goods provided to jurisdictions that do not subscribe to Common Reporting Standards;
- d) transactions involving overly complex supply chains;
- e) transactions involving private banking facilities; and/or
- f) records are incomplete or missing.

Our position is simple: we conduct our business to the highest legal and ethical standards. We will not be party to tax evasion or the facilitation of tax evasion of any form. Such acts would damage our reputation and expose us, and our staff and representatives, to the risk of fines and imprisonment.

We take a zero-tolerance approach to tax evasion facilitation by our people and our third party representatives. We are committed to:

- a) rejecting the facilitation of tax evasion; and
- b) not recommending the services of others who do not have reasonable prevention procedures in place.

We require compliance in regards to this from everyone connected with our business. Integrity and transparency are of utmost importance to us.

B) DEFINITIONS OF TAX EVASION

Tax evasion is the practice of using illegal methods to avoid paying tax. It frequently involves contrived, artificial transactions that serve no purpose other than to reduce tax liability.

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C) POLICY

It is prohibited, directly or indirectly, for any employee or person working on our behalf to take part in any activity relating to tax evasion.

If we suspect that you have taken part in such activity, an investigation will be carried out and, in line with our disciplinary procedure where appropriate, action may be taken against you which may result in your dismissal, or the cessation of our business arrangement with you.

If you, as an employee or person working on our behalf, suspect any activity related to tax evasion or attempted tax evasion has taken place, even if you are not personally involved, you are expected to report this to Keith Morrow. You may be asked to give a written account of events.

D) TRAINING/MONITORING/REVIEW

The Organisation will ensure that it gives all relevant training for staff in relation to financial crime detection and prevention, it will ensure it monitors and enforces compliance with the prevention procedures and regularly review the effectiveness of prevention procedures, refining them where necessary.

E) CONCERNS

Staff are reminded of the Organisation's Whistleblowing policy which is available in the Employee Handbook, or upon request.

Whistle-Blowing Procedure

A) INTRODUCTION

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Under certain circumstances, employees are protected from suffering any detriment or termination of employment if they make disclosures about organisations for whom they work.

B) QUALIFYING DISCLOSURES

Certain disclosures are prescribed by law as “qualifying disclosures”. A “qualifying disclosure” means a disclosure of information that the employee genuinely and reasonably believes is in the public interest and shows that the Organisation has committed a “relevant failure” by:

- a) committing a criminal offence;
- b) failing to comply with a legal obligation;
- c) a miscarriage of justice;
- d) endangering the health and safety of an individual;
- e) environmental damage; or
- f) concealing any information relating to the above.

These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. The Organisation will take any concerns that you may raise relating to the above matters very seriously.

The Employment Rights Act 1996 provides protection for workers who ‘blow the whistle’ where they reasonably believe that some form of illegality, injustice or breach of health and safety has occurred or is likely to occur. The disclosure has to be “in the public interest”. We encourage you to use the procedure to raise any such concerns.

C) THE PROCEDURE

- 1) In the first instance you should report any concerns you may have to Keith Morrow who will treat the matter with complete confidence. If you are not satisfied with the explanation or reason given to you, you should raise the matter with the appropriate official organisation or regulatory body.

If you do not report your concerns to Keith Morrow you should take them direct to the appropriate organisation or body.

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D) TREATMENT BY OTHERS

Bullying, harassment or any other detrimental treatment afforded to a colleague who has made a qualifying disclosure is unacceptable. Anyone found to have acted in such a manner will be subject to disciplinary action.

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Equality & Diversity Policy

A) INTRODUCTION

- 1) We are an equal opportunities employer. We are committed to equality of opportunity and to providing a service and following practices which are free from unfair and unlawful discrimination. The aim of this policy is to ensure that no applicant or member of staff receives less favourable treatment on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation, or is disadvantaged by conditions or requirements which cannot be shown to be relevant to performance. It seeks also to ensure that no person is victimised or subjected to any form of bullying or harassment.

We value people as individuals with diverse opinions, cultures, lifestyles and circumstances. All employees are covered by this policy and it applies to all areas of employment including recruitment, selection, training, deployment, career development, and promotion. These areas are monitored and policies and practices are amended if necessary to ensure that no unfair or unlawful discrimination, intentional, unintentional, direct or indirect, overt or latent exists.

Keith Morrow has particular responsibility for implementing and monitoring the Equality and Diversity in Employment Policy and, as part of this process, all personnel policies and procedures are administered with the objective of promoting equality of opportunity and eliminating unfair or unlawful discrimination.

All employees, workers or self-employed contractors whether part time, full time or temporary, will be treated fairly and with respect. Selection for employment, promotion, training, or any other benefit will be on the basis of aptitude and ability. All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the Organisation.

Equality of opportunity, valuing diversity and compliance with the law is to the benefit of all individuals in our Organisation as it seeks to develop the skills and abilities of its people. While specific responsibility for eliminating discrimination and providing equality of opportunity lies with managers and supervisors, individuals at all levels have a responsibility to treat others with dignity and respect. The personal commitment of every employee to this policy and application of its principles are essential to eliminate discrimination and provide equality throughout the Organisation.

B) OUR COMMITMENT AS AN EMPLOYER

- 1) To create an environment in which individual differences and the contributions of our staff are recognised and valued.

Every employee, worker or self-employed contractor is entitled to a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.

Training, development and progression opportunities are available to all staff.

Equality in the workplace is good management practice and makes sound business sense.

We will review all our employment practices and procedures to ensure fairness.

C) OUR COMMITMENT AS A SERVICE PROVIDER

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- 1) We aim to provide services to which all clients are entitled regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation, offending past, caring responsibilities or social class.

We will make sure that our services are delivered equally and meet the diverse needs of our service users and clients by assessing and meeting the diverse needs of our clients.

This policy is fully supported by senior management and has been agreed with employee representatives

This policy will be monitored and reviewed annually.

We have clear procedures that enable our clients, candidates for jobs and employees to raise a grievance or make a complaint if they feel they have been unfairly treated.

Breaches of our equality and diversity policy will be regarded as misconduct and could lead to disciplinary proceedings.

D) POLICY STATEMENTS

AGE

We will:

- ensure that people of all ages are treated with respect and dignity;
- ensure that people of working age are given equal access to our employment, training, development and promotion opportunities; and
- challenge discriminatory assumptions about younger and older people.

DISABILITY

We will:

- provide any reasonable adjustments to ensure disabled people have access to our services and employment opportunities;
- challenge discriminatory assumptions about disabled people; and
- seek to continue to improve access to information by ensuring availability of loop systems, braille facilities, alternative formatting and sign language interpretation.

RACE

We will:

- challenge racism wherever it occurs;
- respond swiftly and sensitively to racists incidents; and
- actively promote race equality in the Organisation.

GENDER

We will:

- challenge discriminatory assumptions about women and men;
- take positive action to redress the negative effects of discrimination against women and men;
- offer equal access for women and men to representation, services, employment, training and pay and encourage other organisations to do the same; and

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- provide support to prevent discrimination against transsexual people who have or who are about to undergo gender reassignment.

SEXUAL ORIENTATION

We will:

- ensure that we take account of the needs of lesbians, gay men and bisexuals; and
- promote positive images of lesbians, gay men and bisexuals.

RELIGION OR BELIEF

We will:

- ensure that employees' religion or beliefs and related observances are respected and accommodated wherever possible; and
- respect people's beliefs where the expression of those beliefs does not impinge on the legitimate rights of others.

PREGNANCY OR MATERNITY

We will:

- Ensure that people are treated with respect and dignity and that a positive image is promoted regardless of pregnancy or maternity;
- challenge discriminatory assumptions about the pregnancy or maternity of our employees; and
- ensure that no individual is disadvantaged and that we take account of the needs of our employees' pregnancy or maternity.

MARRIAGE OR CIVIL PARTNERSHIP

We will:

- Ensure that people are treated with respect and dignity and that a positive image is promoted regardless of marriage or civil partnership;
- challenge discriminatory assumptions about the marriage or civil partnership of our employees; and
- ensure that no individual is disadvantaged and that we take account the needs of our employees' marriage or civil partnership.

EX-OFFENDERS

We will:

- prevent discrimination against our employees regardless of their offending background (except where there is a known risk to children or vulnerable adults).

EQUAL PAY

We will:

- ensure that all employees, male or female, have the right to the same contractual pay and benefits for carrying out the same work, work rated as equivalent work or work of equal value.

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Bullying & Harassment Policy

All members of staff are entitled to be treated with dignity and respect in their place of work. This means freedom from behaviour by colleagues that can be interpreted as bullying or harassment or that causes offense, and access to redress if such behaviour does arise. It also means standards of everyday behaviour that contribute to a working environment in which mutual respect and individual dignity are maintained.

A) BULLYING AND HARASSMENT

Behaviour can constitute bullying or harassment where: it violates the dignity of a member of staff on the grounds of their age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation (the protected characteristics); or where it creates an intimidating, hostile and degrading, humiliating or offensive environment. Individual or accumulative acts can seriously undermine the dignity, confidence, and work satisfaction to such an extent that it has an effect on job performance, and general happiness both inside and outside work.

Conduct becomes harassment if it persists and it has been made clear that it is regarded as offensive by the recipient or a witness to the conduct, although a single offensive act can amount to harassment if it is sufficiently serious.

Bullying and harassment can be further defined in the following ways:

B) HARASSMENT BASED ON RACE, COLOUR OR ETHNIC ORIGIN

Harassment based on race, colour or ethnic origin is conduct at work directed towards a colleague by another colleague or group of colleagues which is racist in nature, and which is regarded as unwelcome or offensive by the recipient or a witness.

- The following are examples that illustrate such conduct, though this is not an exhaustive list:
- Jokes about race, colour or ethnic origin
- Use of offensive names.
- References to colleagues by offensive racist descriptions.
- Use of offensive or insensitive stereotypes.
- Verbal abuse based on race, colour or ethnic origin.
- Circulation, or display, of offensive material based on race, colour or ethnic origin.
- Detrimental behaviour because of a colleague's race, colour or ethnic origin.

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C) HARASSMENT BASED ON PREGNANCY OR MATERNITY

Harassment based on pregnancy or maternity is conduct at work directed towards a colleague by another colleague or group of colleagues which is based on the pregnancy or maternity of the colleague, and which is regarded as unwelcome or offensive by the recipient or a witness.

The following are examples that illustrate such conduct, though this is not an exhaustive list:

- Jokes about pregnancy or maternity.
- Use of offensive names.
- Use of offensive or insensitive stereotypes.
- Verbal abuse based on pregnancy or maternity.
- Circulation, or display, of offensive material based on pregnancy or maternity.
- Detrimental behaviour because of a colleague's pregnancy or maternity.

D) SEXUAL HARASSMENT

Sexual harassment is conduct directed towards a colleague by another colleague or group of colleagues which is of a sexual nature, or which is based on a colleague's gender, and which is regarded as unwelcome or offensive to the recipient or a witness.

- The following are examples which illustrate such conduct, though this is not an exhaustive list:
- Unwanted physical contact.
- Contact which is intimidating, or physically or verbally abusive.
- Jokes that are based on sexual or gender issues.
- Non-verbal conduct, such as staring or gestures.
- Suggestions that sexual favours may further a person's career, or that refusal may hinder it.
- Sexual advances, propositions, suggestions or pressure for sexual activity at or outside work.

E) HARASSMENT BASED ON DISABILITY

Harassment based on disability is conduct directed towards a colleague by another colleague or group of colleagues which is based on the colleague's disability or association with someone who has a disability and which is unwelcome to the recipient or a witness.

The following are examples which illustrate such behaviour, though this is not an exhaustive list:

- Jokes about disability.
- Use of offensive names.
- Use of offensive or insensitive stereotypes.

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- Verbal abuse based on disability.
- Circulation, or display, of offensive material based on disability.
- Deliberate actions designed to hinder a colleague's ability to undertake his/her duties because of their disability.

F) HARASSMENT BASED ON SEXUAL ORIENTATION OR GENDER REASSIGNMENT

Harassment based on sexual orientation or gender reassignment is conduct directed towards a colleague by another colleague or group of colleagues which is based on the sexuality of the colleague and which is unwelcome by the recipient or a witness.

The following are examples which illustrate such behaviour, though this is not an exhaustive list:

- Jokes about sexuality or gender reassignment.
- Use of offensive names.
- Use of offensive or insensitive stereotypes.
- Verbal abuse based on sexuality or gender reassignment.
- Circulation, or display, of offensive material based on sexuality or gender reassignment.

G) HARASSMENT BASED ON MARRIAGE OR CIVIL PARTNERSHIP

Harassment based on marriage or civil partnership is conduct directed towards a colleague by another colleague or group of colleagues which is based on the marriage or civil partnership of the colleague and which is unwelcome by the recipient or a witness.

The following are examples which illustrate such behaviour, though this is not an exhaustive list:

- Jokes about marriage or civil partnership.
- Use of offensive names.
- Use of offensive or insensitive stereotypes.
- Verbal abuse based on marriage or civil partnership.
- Circulation, or display, of offensive material based on marriage or civil partnership.

H) HARASSMENT BASED ON RELIGION OR BELIEF

Harassment based on religion or belief is conduct directed towards a colleague by another colleague or group of colleagues which is based on the religion or belief of the colleague and which is unwelcome by the recipient or a witness.

The following are examples which illustrate such behaviour, though this is not an exhaustive list:

- Jokes about religions or beliefs.
- Use of offensive names.

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- Use of offensive or insensitive stereotypes.
- Verbal abuse based on religion or belief.
- Circulation, or display, of offensive material based on religion or belief.

I) HARASSMENT BASED ON AGE

Harassment based on age is conduct directed towards a colleague by another colleague or group of colleagues which is based on the age of the colleague and which is unwelcome by the recipient or a witness.

- Jokes about age.
- Use of offensive names.
- Use of offensive or insensitive stereotypes.
- Verbal abuse based on age.
- Circulation, or display, of offensive material based on age.

J) DETRIMENTAL BEHAVIOUR BECAUSE OF AN ASSOCIATION WITH A PROTECTED CHARACTERISTIC

Bullying and harassment may not be based on the fact that a colleague belongs to a particular group, but simply because the individual has been singled out for such treatment or associates with someone of a protected characteristic. For example, this would include claiming someone is gay when they are not or making fun of someone who has a disabled relative. The bullying and harassment may take the following forms, though again this is not intended as an exhaustive list:

- Limiting or withdrawing verbal communication.
- Isolating a colleague by unfriendly behaviour.
- Behaviour designed to belittle or produce anxiety in a colleague.
- Unreasonable scrutiny of work.
- Unreasonable criticism of work, and adopting double standards in expectations of work performance.
- Unreasonable denial of leave and/or special leave requests.
- Unreasonable denial of requests for flexible working.
- Work or staff social activities that deliberately exclude a colleague.
- Jokes or inappropriate humour at the expense of a colleague.

K) STANDARDS OF WORK BEHAVIOUR

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Managing Director

- Courtesy towards colleagues.
- Consideration and understanding of the work demands of colleagues.
- Maintaining a temperate tone, and temperate language, in all verbal and written communication with colleagues.
- Avoidance of the use of foul language.
- Awareness of language and conduct which have the potential to offend a colleague.
- Obtaining the express or implied permission of a colleague before adopting familiarity in conduct or language.

L) WHAT TO DO IF YOU OR A COLLEAGUE IS SUBJECT TO BULLYING OR HARASSMENT

The company is committed to ensuring that there is no harassment or bullying in the workplace. Allegations of harassment will be treated as a disciplinary matter, although every situation will be considered on an individual basis and in accordance with the principles of the grievance and disciplinary procedures, a copy of which is available from Keith Morrow/Director.

1) Informal Complaint

The first step you are encouraged to take is to raise such issues with a senior colleague of your choice (whether or not that person has a direct supervisory responsibility for you) as a confidential helper. However this person cannot be the person who will be responsible for investigating the matter if it becomes a formal complaint.

If you decide you can deal with the inappropriate behaviour informally, for example, if the act concerned is relatively minor, isolated or clearly unintentional. In these situations it is possible that the matter can be resolved immediately by letting your colleague know that the behaviour in question is unacceptable to you and should be avoided in future. If you feel unable to do this verbally, you should hand a written request to your harasser; this is something your confidential helper can assist you with.

2) Formal Complaint

If you feel uncomfortable about raising the issue directly with your harasser or if you consider the behaviour is more serious because it was deliberate, part of a persistent pattern, or serious in nature, or has been repeated despite having discussed a previous incident informally, then you should bring the matter to the attention of Keith Morrow/Director as a formal written complaint and again this is something that your confidential helper can assist you with.

If possible, you should keep notes of the harassment so that the written complaint can include:

- a) the name of the alleged harasser;
- b) the nature of the alleged harassment;
- c) the dates and times when the alleged harassment occurred;
- d) the names of any witnesses; and
- e) any action already taken by you to stop the alleged harassment.

12 Jan 2022

Keith Morrow

Managing Director

Managing Director: Keith Morrow

Registered office: Batchworth House, Batchworth Place, Church Street, Rickmansworth WD3 1JE

Registered Number: 2279698 VAT No: 532 4046 77

On receipt of a formal complaint we will take action to separate you from the alleged harasser to enable an uninterrupted investigation to take place. This may involve a temporary transfer of the alleged harasser to another work area or suspension with contractual pay until the matter has been resolved.

The person dealing with the complaint will invite you to attend a meeting, at a reasonable time and location, to discuss the matter and carry out a thorough investigation. You have the right to be accompanied at such a meeting by your confidential helper or another work colleague of your choice and you must take all reasonable steps to attend. Those involved in the investigation will be expected to act in confidence and any breach of confidence will be a disciplinary matter.

On conclusion of the investigation which will normally be within ten working days of the meeting with you, the decision of the investigator detailing the findings will be sent, in writing, to you.

You have the right to appeal against the findings of the investigator in accordance with the appeal provisions of the grievance procedure.

M) NOTES

- 1) If the decision is that the allegation is well founded, the harasser will be liable to disciplinary action in accordance with our disciplinary procedure. An employee who receives a formal warning or who is dismissed for harassment may appeal by using our capability/disciplinary appeal procedure.
- 2) If you bring a complaint of harassment you will not be victimised for having brought the complaint. However if it is concluded that the complaint is both untrue and has been brought with malicious intent, disciplinary action will be taken against you.

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Environmental Policy

Euro Diamond Drilling LTD is committed to a policy of sound environmental management on its own account and in partnership with clients, designers and other contractors. Our principle goal is to prevent harm to people and damage to the environment or property.

This commitment is driven at all levels of the organisation and we devote time and resources to evaluating and reducing the effects that our work may have on the local environment.

We aim to:

- Establish and maintain working procedures that are environmentally sound.
- Fully integrate these procedures as essential elements of our business.
- Assess the environmental impact of all new works before they start and during their progress.
- Be efficient in the consumption of energy and natural resources, and where possible ensure that materials used can be reduced, recycled, reused, or disposed of safely.
- Make our clients aware of alternative approaches to their projects or changes in materials that would be of greater environmental benefit than those specified.
- Keep abreast of product and procedural developments so that we can continually improve our approach to environmental issues and our environmental footprint.
- Promote the adoption of these principles by any sub-contractors working for us.
- Have emergency procedures that take account of environmental spills and releases, which indicate those that should be reported to the authorities.
- Educate, train and motivate our employees to conduct their activities in an environmentally responsible manner in accordance with this policy.

Keith Morrow has been appointed to take charge of environmental issues for this business. They are responsible for auditing against this policy and for its regular review.

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