

Emplink Policies

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Accidents, Incidents, Near Misses/ Close Calls and Dangerous Occurrences Policy

Purpose and Aim

This policy documents our commitment to ensuring all Accidents, Incident, Near Misses, Close Calls, Dangerous Occurrences and Occupational Disease are reported and fully investigate in accordance with (applicable) Legislation and Industry Standards.



By having a robust Policy, Process, Procedure and Training Guide in place our aim is to deal with any Accidents, Incidents, Near Misses, Close calls and Dangerous Occurrences in an appropriate, effective and efficient manner whilst upholding and adhering to Industry Standards and Legislation.

Scope

All Accidents or Incidents, including Near Misses and Close Calls will be reported immediately to the appropriate person by Emplink Workforce Employees and or Candidates (Temporary, Contract and Permanent).

We will report all Accidents, Incidents, Near Misses, Close Calls and Dangerous Occurrences to the Client in a timely manner and will ensure that robust arrangements are in place to provide information for Client driven accident recording systems.

Accident Books will be maintained at all Emplink Workforce Offices and completed (by the appropriate Consultant or Regional manager) when an Accident occurs. All Candidates working at Client sites and offices will complete local Accident Books.

When applicable, the person nominated as responsible for RIDDOR reporting (Reporting of Injuries, Diseases and Dangerous Occurrences) will report any event/ occurrence to the Health & Safety Executive in accordance with the RIDDOR regulations.

Accidents, Incidents, Near Misses, Close Calls and Dangerous Occurrences

affecting Emplink Workforce will be discussed at Management Reviews and Health & Safety Meetings.

Following an investigation into an Accident or Incident, we will publish conclusions, observations and recommendations which will be communicated out to Emplink Workforce employees and Candidates, in order to avoid similar events happening in the future and to learn from previous experiences.



All records shall be kept for a minimum of 10 years, be legible and readily identifiable.

Responsible Parties:

- Directors
- Health & Safety Manager / Representative
- Regional Managers
- Emplink Workforce Employees
- Candidates (Temporary, Contract & Permanent)

Bribery and Corruption Policy

Introduction

Our corporate conduct is based on our commitment to acting professionally, fairly and with integrity. Emplink Workforce does not tolerate any form of bribery and corruption.

The purpose of this policy is to set out the responsibilities of Group functions and business units in observing and upholding our position on bribery and corruption.

This policy applies to Emplink Workforce employees (staff, contract and temporary workers) and extends to all our business dealings with our clients.

We define bribery and corruption as follows:

- the receiving or offering of an undue reward by or to any holder of public office, private employee, colleague, or representative of any

other organisation, designed to influence them in the exercise of their duty, and to incline them to act contrary to accepted standards of honesty and integrity

- the misuse of public office or public power for private gain by offering or promising anything of value, whether directly or indirectly, to a public official or a political candidate, party or party official in order to obtain, retain or direct business, or to secure any improper business advantage. Also included is the demanding or accepting of anything of value by such a person as a condition to conferring an improper business advantage, whether directly or indirectly

Policy

This policy set out our commitment to operate responsibly wherever we work and to engage with our employees and clients to manage the social, environmental and ethical impact of our activities in the different markets in which we operate.

Our first principle is that Emplink Workforce does not engage in bribery or any form of unethical inducement or payment including facilitation payments and 'kickbacks.' All employees are required to avoid any activities that might lead to, or suggest, a conflict of interest with the business of the Company.

Emplink Workforce Bribery and Corruption Policy requires employees:

- Not to offer or make any bribe, unorthodox or unauthorised payment or inducement of any kind to anyone
- Not to solicit business by offering any bribe, unorthodox or unofficial payment to customers or potential customers
- Not to accept any kind of bribe, unorthodox or unusual payment or inducement that would not be authorised by Emplink Workforce in the ordinary course of business
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- To refuse any bribe or unorthodox payment and to do so in a manner that is not open to misunderstanding or giving rise to false expectation; and to report any such offers
- Not to make facilitation payments. These are payments used by businesses or individuals to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has a legal or other entitlement. Emplink Workforce will not tolerate or condone such payments being made unless required for medical or safety emergencies in jurisdictions where such payments are considered normal. Where this occurs, a record of any such payment should be maintained
- To report any breaches of the policy, related principles or standards or of any associated legislation.

Responsibilities

Senior management has the primary responsibility for implementing this policy. The Managing Director and Quality Manager will establish appropriate responsibilities and procedures within their operations. If any instance of bribery or corruption is identified, we will take remedial steps immediately.

Training and communications

We will communicate this policy and relevant guidance to employees across the company, through our established internal communication channels. We will also communicate this policy to our employees, suppliers, and clients. Managers, employees and agents will receive relevant training on how to implement this policy in the scope of their employment with the company.

Raising concerns and seeking guidance

Employees are encouraged to raise concerns about any instance of malpractice at the earliest possible stage to a member of the management team.



Employees will receive the full support of the company when refusing to pay a bribe, even if it may result in the Company losing business.

Monitoring and review

Emplink Workforce management will review the implementation of this policy

in respect of its suitability, adequacy and effectiveness and make improvements as appropriate. It will periodically report the results of this process to the Group Audit Committee, which will make an independent assessment of the adequacy of the policy and disclose any material non-compliance in the Annual Report to shareholders.

Internal controls and audit

Emplink Workforce will maintain accurate records - available for inspection under our internal auditing system - which properly and fairly document all financial transactions. Internal control systems will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

Raising Concerns

Our Raising Concerns policy and guidance is available to any employee who encounters a breach or potential breach of policy. They can report concerns in confidence and without fear of reprisals. All reports raised are taken seriously and, where appropriate, investigated in more depth. No employee is discriminated against in any way as a result of reporting a concern in good faith.

Our policy on bribery and corruption is supported by governance procedures covering monitoring of adherence and record keeping. Any breach of policy by any employee will be considered as grounds for disciplinary action, which may include dismissal.

Corporate Social Responsibility and Sustainability Policy

Introduction

Emplink Workforce (Emplink Ltd) is committed to a policy of corporate social responsibility (CSR) and sustainable development. CSR sets the framework and defines the method in which organisations and businesses must operate to be able to meet ethical, legal, commercial and public expectations that a society has of any organisation. Sustainable development is “development that meets the needs of the present, without compromising the ability of future generations to meet their own needs”.

We expect that everyone working for the company will take responsibility for living up to this commitment. We also require the same from any third parties acting on our behalf. We are dedicated to providing the highest standards of service to our customers. We actively encourage the professional and personal development of our key resource and to uphold the law and legislation that protects and respects the health, safety and wellbeing of all of our employees. Emplink Workforce is committed to strive to achieve environmental and social sustainability for our service. We recognise the importance of delivering an affordable and sustainable service, suitable for current and future needs.

We value the principles of accountability, honesty and integrity in all aspects of our business.

Specific targets:

- Fair treatment of all employees and directors
- Commitment to full legal compliance in all that we do

- Transparency of all our business policies and processes
 - High standards in all matters relating to quality, Health, Safety and Environment
 - Ethical business practices throughout our operations
 - Building a successful business – ensuring that we continue to add to a stable economy
 - Community Investment – ensuring a commitment to improving the local community
 - Protecting the environment – working with our Clients, Candidates and Employees to reduce our carbon footprint, reduce our waste production and increase our active environmental initiatives
 - Providing better prospects for our people – by offering opportunities for our employees continual learning and development
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- Continually evaluating what we do to ensure continual improvement of our business

We have a moral duty to act. It is part of our role within an industry that is important to the success of Britain, both today and in the future. And acting makes good sense, from an ethical and business perspective.

Environmental Policy Statement

At Emplink Workforce we recognise and understand the value of pro-actively monitoring and managing the environmental impact of our operations. We are committed to the continuous improvement of our environmental performance.

In order to fulfil our commitment, we shall:

- Comply with environmental legislation, regulations and Codes of Practice.
- Pursue a sympathetic and planned approach to the identification and control of operations that have the potential for environmental harm. Develop and implement objectives and targets and monitor their success.
- Identify and manage significant environmental aspects and impacts of operational development projects, work activities, plant and equipment used and disposal of waste.
- Promote the conservation, and sustainable use, of natural resources to minimise environmental pollution and to promote energy efficiency in all of our own work activities, and those of our sub-contractors, where engaged.
- Ensure our staff and contractors are aware of their role and responsibilities in managing the environmental aspects of our operations.
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- Provide suitable resources to ensure the development and maintenance of the environmental management system on a corporate and local level.
- Respond sensitively and speedily to external and internal environmental feedback and the needs and concerns of communities and interested parties.

Responsibility: The Managing Director, assisted by the management team, shall continually monitor the implementation and application of our Environmental Policy.

We shall communicate this policy to our staff by displaying a copy at each of our locations, briefing the policy during the induction process and issuing a copy to affected parties as appropriate.



Monitoring and Review: The Managing Director, assisted by the management team, shall regularly monitor compliance of this policy and associated objects, and will review this on an annual basis or sooner if appropriate.

Equal Opportunities & Diversity Policy

General

Emplink Workforce Limited is positively committed to a policy of equal opportunities for all employees, workers and applicants and shall adhere to such a policy at all times and will review on an on-going basis on all aspects of recruitment to avoid unlawful or undesirable discrimination. Emplink Workforce Limited will treat everyone equally irrespective of sex, sexual orientation, marital status, age, disability, race, colour, ethnic or national origin, religion, political beliefs or membership or non-membership of a Trade Union and places an obligation upon all staff to respect and act in accordance with the policy. Emplink Workforce Limited is committed to providing training for its entire staff in equal opportunities practice.

Emplink Workforce Limited shall not discriminate unlawfully when deciding

which candidate/temporary worker is submitted for a vacancy or assignment, or in any terms of employment or terms of engagement for temporary workers. Emplink Workforce Limited will ensure that each candidate is assessed only in accordance with the candidate's merits, qualification and ability to perform the relevant duties required by the particular vacancy.

Emplink Workforce Limited will not accept instructions from clients that indicate an intention to discriminate unlawfully.

Sex and Race Discrimination

Unlawful sex or race discrimination occurs in the following circumstances:

Direct Discrimination

Under the Sex Discrimination Act 1975 and the Race Relations Act 1976 direct discrimination occurs where one individual treats another individual less favourably on grounds of their sex or race than he treats or would treat other persons.

It is unlawful for a recruitment consultancy to discriminate against a person on the grounds of their sex, colour, race, nationality, ethnic or national origins: -

- in the terms on which the recruitment consultancy offers to provide any of its services;
- by refusing or omitting to provide any of its services;
- in the way it provides any of its services..

Direct discrimination would also occur if a recruitment consultancy accepted and acted upon a job registration from an employer that states that certain persons are unacceptable because of their sex, colour, race, nationality, or ethnic or national origins, unless one of the exceptions applies.

Indirect Discrimination

A claim of indirect discrimination arises when an employer applies a requirement or condition generally, but which is such a proportion of persons from one racial group who can comply with it is considerably smaller than the proportion of persons not of that racial group who can comply with it.

Indirect discrimination would also occur if a recruitment consultancy accepted and acted upon an indirectly discriminatory instruction from an

employer.

Emplink Workforce Limited will not discriminate unlawfully when selecting candidates or temporary workers for submission or a vacancy or assignment or in any terms of employment or terms of engagement for temporary workers.

If the vacancy falls within the definition of a genuine occupational qualification or any other statutory exception Emplink Workforce Group will not deal further with the vacancy unless the client provides written confirmation of the genuine occupational qualification.

Disability and Discrimination

Under the Disability Discrimination Act 1995, disability discrimination occurs if for a reason which relates to the disabled person's disability an individual:

- Treats them less favourably than he treats, or would treat others to whom that reason does not or would not apply, and,
- The employer cannot show that the treatment in question is justified.

- Treats him less favourably than he treats, or would treat others to whom that reason does not or would not apply, and,

The employer cannot show that the treatment in question is justified.

Emplink Workforce Limited will not discriminate against a disabled job applicant or employee on the grounds of disability -

- In the arrangements i.e. application form, interview and arrangements for selection for determining to whom a job should be offered; or



- In the terms on which employment or engagement of temporary workers is offered; or
- By refusing to offer, or deliberately not offering the disabled person a job for reasons connected with their disability; or
- In the opportunities afforded to the person for receiving any benefit, or by refusing to afford, or deliberately not affording him or her any such opportunity; or
- By subjecting him or her to any other detriment (detriment will include refusal of training, transfer, demotion, reduction of wage; or harassment).

Emplink Workforce Limited will accordingly make career opportunities available to all people with disabilities and every practical effort will be made to provide for the needs of staff, candidates and clients.

Wherever possible Emplink Workforce Limited will make reasonable adjustments to hallways, passages and doors in order to provide and improve means of access for disabled employees and workers. However, this may not always be feasible.

Age Discrimination

Emplink Workforce Limited will encourage clients not to include any age criteria or other subjective criteria in job specifications and every attempt will be made to persuade clients to recruit on the basis of competence and skill and not age.

Emplink Workforce Limited is committed to recruiting and retaining employees whose skills, experience, and attitudes are appropriate to the requirements of



the various positions regardless of age.

As far as is reasonably possible and in the most exceptional circumstances no age requirements will be stated in any job advertisements on behalf of the company.

Emplink Workforce Limited will request age as part of its recruitment process but information will not be used in any detrimental way and is for compilation of personal data, which the company holds on all employees and workers.

Complaints and Monitoring Procedures

Emplink Workforce Limited has in place procedures for dealing with complaints of discrimination. These are available from the Director and will be made available immediately upon request.

Part-time Workers

This Equal Opportunities Policy also covers the treatment of those employees and workers who work on a part-time basis. Emplink Workforce Limited recognises that it is an essential part of this policy that part time employees are treated on the same terms as full time employees (albeit on a pro rata basis) in matters such as rates of pay, holiday entitlement, maternity leave, parental and domestic incident leave and access to Emplink Workforce Limited's pension scheme. Emplink Workforce Limited also recognises that part time employees must be treated the same as full time employees in relation to training and redundancy situations.

Harassment Policy

Emplink Workforce Limited is permitted to providing a work environment free from unlawful harassment. Our interpretation of what constitutes as harassment is behaviour that is likely to cause offence, distress, alienation or inappropriate and unwanted attention.

Harassment because of race, colour, creed, sex, sexual orientation, marital status, national origin or ancestry, physical or mental disability, age or religion or any other basis protected by legislation is unlawful and will not be tolerated by Emplink Workforce Limited.

This policy prohibits unlawful harassment by any employee or worker of Emplink Workforce Limited.

Examples of prohibited harassment are:-

- Verbal or written conduct containing derogatory jokes or comments,
- Slurs or unwanted sexual advances
- Visual conduct such as derogatory or sexually orientated posters, Photographs, cartoons, drawings or gestures,
- Physical conduct such as assault, unwanted touching, or any interference, because of sex, race or any other protected basis,
- Threats and demands submit to sexual requests as a condition of continued employment or to avoid some other loss, and offers of employment benefits in return for sexual favours
- Retaliation for having reported or threatened to report harassment.



If you believe that you have been unlawfully harassed, you should make an immediate report to a Director followed by a written complaint as soon as possible after the incident. Your complaint should include:

- Details of the incident
- The name or names of the individual or individuals involved
- The name or names of any witness or witnesses

Emplink Workforce Limited will undertake a thorough investigation of the allegations. If it is concluded that unlawful harassment has occurred, remedial action will be taken.

Any employee who Emplink Workforce Limited finds to be responsible for unlawful harassment will be subject to the disciplinary procedure and any sanction may include termination.

Gender Reassignment Policy

Emplink Workforce Limited recognises that any employee or worker may wish to change their gender during the course of their employment with the Company.

Emplink Workforce Limited will support any employee or worker through the reassignment provided that full medical counselling has been undertaken and Emplink Workforce Limited has access to any relevant medical reports.

Emplink Workforce Limited will make every effort to try and protect the employee or worker undergoing reassignment within the work place.

All employees and workers will be expected to comply with Emplink



Workforce Limited's policy on harassment in the workplace. Any breach of such a policy will lead to the appropriate disciplinary sanction.

Where an employee is engaged in work where the gender change imposes genuine problems Emplink Workforce Limited will make every effort to reassign the employee or worker to an alternative role in the Company.

Any employee or worker suffering discrimination as the result of their gender reassignment should make recourse to the Company's grievance procedure.

Any discrimination complaint will be investigated fully.

Complaints and Monitoring Procedures

Emplink Workforce has in place procedures for monitoring compliance with this policy and for dealing with complaints of discrimination. These are available from Emma Finlay and will be made available immediately upon request.

Any discrimination complaint will be investigated fully

Health & Safety Policy Statement

Here at Emplink Workforce the Health & Safety of all of our employees and Candidates is our number one priority. Through the way we conduct ourselves and work, we continually demonstrate our commitment to maintaining and improving health & safety throughout our business as a whole.

This policy also reflects our commitment to ensuring health and safety at work is paramount and that effective, pro-active and robust health and safety measures actively contribute to the success of Emplink Workforce as a whole.



We, as a business, shall ensure the health & safety of all of our employees and Candidates in addition to the health & safety of persons who are not in direct employment but persons who may be affected by our operations.

Our underpinning belief is that all workplace injuries and instances of occupational ill health are preventable and as such we implement a robust health & safety policy in order to minimise any risks associated with our work and wherever possible eliminate them.

We also

- Provide suitably trained and competent specialist resources to our Clients

- Provide adequate instruction and training on the health & safety issues which may affect employees and Candidates, as well as the safe working practices that should be followed
- Work with our Clients to ensure that all PPE, equipment & plant is suitable and adequately maintained
- Encourage the safe handling and use of any hazardous substances
Ensure Senior management demonstrates leadership in health & safety at all times
- Develop innovative health & safety practices as well as consistently encourage, develop and review Best Practice internally as well as externally
- Engage with Clients and partners to drive improvements in health & safety as well as to meet and achieve our health and safety expectations

We also believe that the promotion of a positive health and safety culture



within Emplink Workforce is a mutual objective for both management and employees at all levels.

With this in mind Emplink Workforce will endeavour to:

- Provide and maintain a health working environment, taking into account legislative requirements
- Regularly consult with employees and representatives regarding health and safety matters
- Hold regular meetings to allow health and safety matters to be discussed
- Provide means for employees to feedback to management regarding health and safety issues
- Improve the way in which accidents and incidents are investigated and closed out
- Continue to monitor compliance with our management systems and supporting documentation via inspection and audit

- Ensure systems are in place so people will be empowered to raise health and safety concerns with management

Responsibility: The Company Director will continually monitor the implementation and application of this Health and Safety Policy during regular meetings and ensure adequate financial resources are available for health and safety together with appropriate competence and expertise.

We will communicate this policy to all our staff by displaying a copy at each of our locations, briefing the policy during the induction process and issuing a copy to affected parties as appropriate.

Equally we will regularly update our staff on our health and safety performance together with the outcome of all accidents and incidents so that lessons can be learnt to prevent reoccurrence.



Monitor and Review: The Managing Director of Company, assisted by the Management team will regularly monitor compliance of this policy and associated objectives and will review this on an annual basis or sooner as appropriate.