

Clad Safety Policy Documents






Workplace: Clad Safety Limited

Document: Bribery and Corruption Policy

Reference: E04

1. We will submit bona fide tenders, intended to be competitive, and that we will not fix or adjust the amount of the tender or the rates and prices quoted by agreement or arrangement with any other person.
2. We will not enter into any agreement or arrangement with any other person with the aim of preventing tenders or commercial transactions being made or as to the fixing or adjusting of the amount of any tender or commercial transaction or the conditions on which any tender or commercial transaction is made.
3. We will not inform any other person of the amount or approximate amount of any tender except where such disclosure was necessary, in confidence, to obtain quotations for insurances and/or performance bonds.
4. We will not cause or induce any person to enter into such agreements or arrangements described above or to inform us of the amount or approximate amount of any rival tenders or pass on the benefit of any inside information about the intentions of any other tenderer.
5. We will not offer or agree to pay or give any money, inducement or consideration directly or indirectly to any person whether a government officer or employee in any commercial organisation for doing or having caused to be done any act or omission in relation to any other tender.
6. We will not falsify or misstate the details of any transaction or document or falsify any of the company's books or records.
7. We will not offer prospective purchasers personal gifts, travel, hospitality or free entertainment on any scale likely to induce actions which are inconsistent with normal commercial practise.
8. We will notify any prospective purchaser where we are aware of any conflict of interest relevant to the proposed transaction.

Signed: 

Designation: Managing Director

Date: 20th April 2021

Approved By: N Trevvett

Version: 1.3

Issue Date: 20th April 2021

Review Date: 20th April 2024



COUNTERFEIT, FRAUDULENT AND SUSPECT ITEMS POLICY AND STATEMENT

Workplace: Clad Safety Limited

Document: Counterfeit, Fraudulent and Suspect Items Policy and Statement

Reference: E05

POLICY


Prevent, detect and dispose of Counterfeit, Fraudulent and Suspect Items (CFSI). Authorised persons carry out these actions as required.

The chart below details the mitigation of risk from each step of the process:

- Purchasing - Suppliers evaluated and approved in-line with a documented process
- Goods Inwards - Incoming product accompanied by certification, which is checked against original Purchase Order. Incoming product inspected for suspect items and validated against purchasing specification in-line with a documented process. Any non-conformance is raised with the supplier and material rejected if necessary
- Testing - Product is tested to meet the requirements of international standards. Product identified as non-conforming is isolated, quarantined and disposed of accordingly
- Goods Outwards - All documentation is checked and approved prior to despatch, and product is certified in line with our ISO9001 accreditation

STATEMENT

At Clad Safety Limited safety is our overriding priority and we regard the co-operation of our supply chain throughout the tiers as essential to maintain the highest standards for all the goods we supply. We understand the potential risks concerning the supply of CFSI within the supply chain, and to this end we only choose suppliers that can demonstrate the quality and source of the goods that we require. All our employees involved in the purchasing of goods have been informed about the potential for CFSI and advised that all goods must be purchased directly from the manufacturers or from agreed and official distribution channels.

Signed: 

Designation: Managing Director

Approved By: N Trevvett

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Workplace: Clad Safety Limited

Document: Business Continuity and Disaster Recovery Policy

Reference: E07

1. Introduction

Clad Safety Ltd is committed to providing the best possible experience to its customers and the best possible relationships with employees, shareholders and suppliers. To ensure the consistent availability and delivery of its products and services, Clad Safety Ltd has developed the following Business Continuity and Disaster Recovery Policy (BC & DR) in support of a comprehensive program for BC & DR and overall business survivability.

The Company, like any other organisation, is exposed to potential risks that could disrupt or destroy critical business functions and/or the production and delivery of Company goods and services. Our strategy for continuing business in the event of an incident is to ensure the safety and security of all employees; and to continue critical business functions, production and delivery of products and services from predefined alternative sites.

2. Purpose and Scope

The purpose of the BC & DR policy is to ensure that all Company business activities can be kept at normal or near-normal performance following an incident that has the potential to disrupt or destroy the Company. The scope of this policy is the entire Company, its subsidiaries, offices and employees in the U.K.

3. Statement of Policy

Each department in the Company is responsible for preparing current and comprehensive Business Continuity Plans (BCP) for its operations. Certain departments, such as Information Technology (IT), are also responsible for Disaster Recovery Plans (DRP) to ensure that any damage or disruptions to critical assets can be quickly minimized and that these assets can be restored to normal or near normal operation as quickly as possible. When a plan is completed, approved and implemented, each plan will include procedures and support agreements which ensure on-time availability and delivery of required products and services. Each plan must be certified annually with the business continuity policy compliance process through the BC & DR Team. Clad Safety Ltd acknowledges that it will use the British Standard, BS 25999, Part 2:2007 as the guidance and structure for its business continuity activities and the ISO/IEC 24762 standard for all comparable disaster recovery activities.

Clad Safety Ltd recognises the importance of an active and fully supported BC & DR program to ensure the safety, health and continued availability of employment of its employees and the production and delivery of quality goods and services for customers and other stakeholders. Clad Safety Ltd requires the commitment of each employee, department and vendor in support of the activities required to protect Company assets, mission, survivability and business continuity.

4. Policy Leadership

Neil Trevvett is designated as the corporate management liaison responsible for the BC & DR program. Resolution of issues in the development of, or support of, all BC & DR plans and associated activities

should first be coordinated with the BC & DR Team and appropriate internal or external organizations before submitting to the corporate management liaison. The issue resolution process is defined in the following section.

5. Verification of Policy Compliance

BC & DR compliance verification is managed by the BC & DR Team with support from other relevant internal departments. Each plan must define appropriate procedures, staffing, tools and workplace planning activities necessary to meet compliance requirements. Plan templates have been developed to facilitate the plan development process, and these templates shall be used for all plans. Detailed policy compliance verification activities are defined by the BC & DR Team and are included in the Appendix at the end of this policy.

BC & DR Compliance Verification is required annually and is facilitated by the BC & DR Team. Waivers for temporary compliance verification may be given if a detailed written waiver request issued by the department manager is approved by the BC & DR Team corporate management liaison. Maximum delay for compliance is one year from the original date of compliance.


6. Penalties for Non-Compliance

In situations where a Company department does not comply with the BC & DR policy, the BC & DR Team will prepare a brief stating the case for non-compliance and present it to the BC & DR corporate management liaison for resolution. Failure to comply with BC & DR policies within the allotted time for resolution may result in verbal reprimands, notes in personnel files, termination and other remedies as deemed appropriate.

7. Planning & Exceptions Control

- All department heads within Clad Safety Ltd are responsible for business continuity (and, where appropriate, disaster recovery) for their area and are required to have a documented BC plan, signed by them and countersigned by the BC & DR corporate management liaison.
- Each department must have a BC & DR coordinator to assist in the implementation and maintenance of BC & DR plans, as well as readiness reporting for that department.
- BC & DR readiness within the Company must be reported on a quarterly basis to the BC & DR corporate management liaison.
- Deviations from this policy must be approved by the BC & DR corporate management liaison and others he/she shall designate. The internal audit department will review policy compliance.

Please see E06 - Business Continuity & Disaster Recovery Plan for further details

Signed: 

Designation: Managing Director

Date: 20th April 2021

Approved By: N Trevvett

Version: 1.3.1

Issue Date: 20th April 2021

Review Date: 20th April 2024



Workplace: Clad Safety Limited

Document: Equal Opportunities & Diversity

Reference: E08

STATEMENT OF POLICY

Clad Safety is an Equal Opportunities Employer. The aim of this policy is to ensure no job applicant or employee receives less favourable treatment on the grounds of gender, race, colour, nationality, marital status, ethnic origin, sexuality, religion, disability or age. All employees will be given equality of opportunity and will be encouraged to progress within the organisation. The company is committed to make the policy fully effective.

IMPLEMENTATION AND MONITORING

Neil Trevvett will be responsible for managing and developing the Equal Opportunities Policy and for giving advice on any matter relating to the policy.

The policy will be monitored and reviewed on a regular basis to make sure that it is as effective as possible, in eliminating discrimination and promoting equality. Statistical information in respect of employees and job applicants will be recorded with reference to gender, race, ethnic origin and disability (for record purposes only). If monitoring reveals under-representation of particular groups, positive action will be taken to redress the imbalance.

1. TRAINING AND EQUAL OPPORTUNITY / DIVERSITY AWARENESS

- All employees will be made aware of the company policy and their co-operation is essential for the success of the policy.
- Staff involved in recruitment and selection will be given on-going training to ensure compliance with the policy.


2. RECRUITMENT

- Selection procedures and job criteria will be constantly reviewed to ensure that individuals are selected, promoted and treated on the basis of their relevant merits and abilities.
- All advertising will be monitored to ensure that discrimination is not present.

3. EMPLOYEE OBLIGATIONS

- All employees are required to take positive action to ensure that the Equal Opportunities Policy is effective. Before making a decision or taking action, consider what the implications are in respect of equality.

Harassment, victimisation and discrimination will not be tolerated and are subject to disciplinary action, which may result in the employee being dismissed.

Signed: 

Designation: Managing Director

Date: 20th April 2021

Approved By: N Trevvett

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Workplace: Clad Safety Limited

Document: General Data Protection Regulation (GDPR) Policy

Reference: E10

INTRODUCTION

We hold personal data about our employees, clients, suppliers and other individuals for a variety of business purposes.

This policy sets out how we seek to protect personal data and ensure that members of staff understand the rules governing their use of personal data to which they have access in the course of their work. In particular, this policy requires staff to ensure that the Commercial Director (CD) be consulted before any significant new data processing activity is initiated to ensure that relevant compliance steps are addressed.

DEFINITIONS

Business Purposes

The purposes for which personal data may be used by us:

Personnel, administrative, financial, regulatory, payroll and business development purposes.

Business purposes include the following:

- Compliance with our legal, regulatory and corporate governance obligations and good practice
- Gathering information as part of investigations by regulatory bodies or in connection with legal proceedings or requests
- Ensuring business policies are adhered to (such as policies covering email and internet use)
- Operational reasons, such as recording transactions, training and quality control, ensuring the confidentiality of commercially sensitive information, security vetting, credit scoring and checking
- Investigating complaints
- Checking references, ensuring safe working practices, monitoring and managing staff access to systems and facilities and staff absences, administration and assessments
- Monitoring staff conduct, disciplinary matters
- Marketing our business
- Improving services

Personal Data

Information relating to identifiable individuals, such as job applicants, current and former employees, agency, contract and other staff, clients, suppliers and marketing contacts.

Personal data we gather may include: individuals' contact details, educational background, financial and pay details, details of certificates and diplomas, education and skills, marital status, nationality, job title, and CV.



Sensitive Personal Data

Personal data about an individual's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership (or non-membership), physical or mental health or condition, criminal offences, or related proceedings—any use of sensitive personal data should be strictly controlled in accordance with this policy.

SCOPE

This policy applies to all staff. You must be familiar with this policy and comply with its terms. This policy supplements our other policies relating to internet and email use. We may supplement or amend this policy by additional policies and guidelines from time to time. Any new or modified policy will be circulated to staff before being adopted.

Who is responsible for this policy?

As our Commercial Director Reggie Trevvett has overall responsibility for the day-to-day implementation of this policy.

OUR PROCEDURES

Fair and lawful processing

We must process personal data fairly and lawfully in accordance with individuals' rights. This generally means that we should not process personal data unless the individual whose details we are processing has consented to this happening.

Responsibilities of the Commercial Director:

- Keeping the board updated about data protection responsibilities, risks and issues
- Reviewing all data protection procedures and policies on a regular basis
- Arranging data protection training and advice for all staff members and those included in this policy
- Answering questions on data protection from staff, board members and other stakeholders
- Responding to individuals such as clients and employees who wish to know which data is being held on them by Alansons Industries Ltd
- Checking and approving with third parties that handle the company's data any contracts or agreement regarding data processing

Responsibilities of the IT Manager:

- Ensure all systems, services, software and equipment meet acceptable security standards
- Checking and scanning security hardware and software regularly to ensure it is functioning properly
- Researching third-party services, such as cloud services the company is considering using to store or process data.



Responsibilities of the Marketing Manager

- Approving data protection statements attached to emails and other marketing copy
- Addressing data protection queries from clients, target audiences or media outlets
- Coordinating with the CD to ensure all marketing initiatives adhere to data protection laws and the company's Data Protection Policy.

The processing of all data must be:

- Necessary to deliver our services
- In our legitimate interests and not unduly prejudice the individual's privacy
- In most cases this provision will apply to routine business data processing activities

Our Terms of Business contains a Privacy Notice to clients on data protection.

The notice:

- Sets out the purposes for which we hold personal data on customers and employees
- Highlights that our work may require us to give information to third parties such as expert witnesses and other professional advisers
- Provides that customers have a right of access to the personal data that we hold about them

SENSITIVE PERSONAL DATA

In most cases where we process sensitive personal data, we will require the data subject's explicit consent to do this unless exceptional circumstances apply, or we are required to do this by law (e.g. to comply with legal obligations to ensure health and safety at work). Any such consent will need to clearly identify what the relevant data is, why it is being processed and to whom it will be disclosed.

ACCURACY AND RELEVANCE

We will ensure that any personal data we process is accurate, adequate, relevant and not excessive, given the purpose for which it was obtained. We will not process personal data obtained for one purpose for any unconnected purpose unless the individual concerned has agreed to this or would otherwise reasonably expect this.

Individuals may ask that we correct inaccurate personal data relating to them. If you believe that information is inaccurate you should record the fact that the accuracy of the information is disputed and inform the CD.

YOUR PERSONAL DATA

You must take reasonable steps to ensure that personal data we hold about you is accurate and updated as required. For example, if your personal circumstances change, please inform the Commercial Director so that they can update your records.



DATA SECURITY

You must keep personal data secure against loss or misuse. Where other organisations process personal data as a service on our behalf, the CD will establish what, if any, additional specific data security arrangements need to be implemented in contracts with those third-party organisations.

STORING DATA SECURELY

- In cases when data is stored on printed paper, it should be kept in a secure place where unauthorised personnel cannot access it
- Printed data should be shredded when it is no longer needed
- Data stored on a computer should be protected by strong passwords that are changed regularly.
- We encourage all staff to use a password manager to create and store their passwords.
- Data stored on CDs or memory sticks must be locked away securely when they are not being used
- The CD must approve any cloud used to store data
- Servers containing personal data must be kept in a secure location, away from general office space
- Data should be regularly backed up in line with the company's backup procedures
- Data should never be saved directly to mobile devices such as laptops, tablets or smartphones
- All servers containing sensitive data must be approved and protected by security software and strong firewall.

DATA RETENTION

We must retain personal data for no longer than is necessary. What is necessary will depend on the circumstances of each case, considering the reasons that the personal data was obtained, but should be determined in a manner consistent with our data retention guidelines.

TRANSFERRING DATA INTERNATIONALLY

There are restrictions on international transfers of personal data. You must not transfer personal data anywhere outside the UK without first consulting the Commercial Director.

SUBJECT ACCESS REQUESTS

Please note that under the Data Protection Act 2018, individuals are entitled, subject to certain exceptions, to request access to information held about them.

If you receive a subject access request, you should refer that request immediately to the CD. We may ask you to help us comply with those requests.

Please contact the Commercial Director if you would like to correct or request information that we hold about you. There are also restrictions on the information to which you are entitled under applicable law.



PROCESSING DATA IN ACCORDANCE WITH THE INDIVIDUAL'S RIGHTS

You should abide by any request from an individual not to use their personal data for direct marketing purposes and notify the CD about any such request.

Do not send direct marketing material to someone electronically (e.g. via email) unless you have an existing business relationship with them in relation to the services being marketed.

Please contact the CD for advice on direct marketing before starting any new direct marketing activity.

TRAINING

All staff will receive training on this policy. New joiners will receive training as part of the induction process. Further training will be provided at least every two years or whenever there is a substantial change in the law or our policy and procedure.

Training is provided through an in-house seminar on a regular basis. It will cover:

- The law relating to data protection
- Our data protection and related policies and procedures.

Completion of training is compulsory.

GDPR PROVISIONS

Where not specified previously in this policy, the following provisions will be in effect on or before 1st January 2020.

Privacy Notice - transparency of data protection

Being transparent and providing accessible information to individuals about how we will use their personal data is important for our organisation. The following are details on how we collect data and what we will do with it:

What information is being collected?

Who is collecting it?

How is it collected?

Why is it being collected?

How will it be used?

Who will it be shared with?

Identity and contact details of any data controllers

Details of transfers to third country and safeguards

Retention period



CONDITIONS FOR PROCESSING

We will ensure any use of personal data is justified using at least one of the conditions for processing and this will be specifically documented. All staff who are responsible for processing personal data will be aware of the conditions for processing. The conditions for processing will be available to data subjects in the form of a privacy notice.

JUSTIFICATION FOR PERSONAL DATA

We will process personal data in compliance with all six data protection principles.

We will document the additional justification for the processing of sensitive data, and will ensure any biometric and genetic data is considered sensitive.

CONSENT

The data that we collect is subject to active consent by the data subject. This consent can be revoked at any time.

CRIMINAL RECORD CHECKS

Any criminal record checks are justified by law. Criminal record checks cannot be undertaken based solely on the consent of the subject.

DATA PORTABILITY

Upon request, a data subject should have the right to receive a copy of their data in a structured format. These requests should be processed within one month, provided there is no undue burden and it does not compromise the privacy of other individuals. A data subject may also request that their data is transferred directly to another system. This must be done for free.

RIGHT TO BE FORGOTTEN

A data subject may request that any information held on them is deleted or removed, and any third parties who process or use that data must also comply with the request. An erasure request can only be refused if an exemption applies.



PRIVACY BY DESIGN AND DEFAULT

Privacy by design is an approach to projects that promote privacy and data protection compliance from the start. The CD will be responsible for conducting Privacy Impact Assessments and ensuring that all IT projects commence with a privacy plan.

When relevant, and when it does not have a negative impact on the data subject, privacy settings will be set to the most private by default.

INTERNATIONAL DATA TRANSFERS

No data may be transferred outside of the EEA without first discussing it with the Commercial Director. Specific consent from the data subject must be obtained prior to transferring their data outside the EEA.

DATA AUDIT AND REGISTER

Regular data audits to manage and mitigate risks will inform the data register. This contains information on what data is held, where it is stored, how it is used, who is responsible and any further regulations or retention timescales that may be relevant.

REPORTING BREACHES

All members of staff have an obligation to report actual or potential data protection compliance failures. This allows us to:

- Investigate the failure and take remedial steps if necessary
- Maintain a register of compliance failures
- Notify the Supervisory Authority (SA) of any compliance failures that are material either in their own right or as part of a pattern of failures

Please refer to our Compliance Failure Policy for our reporting procedure.

MONITORING

Everyone must observe this policy. The CD has overall responsibility for this policy. They will monitor it regularly to make sure it is being adhered to.

CONSEQUENCES OF FAILING TO COMPLY

We take compliance with this policy very seriously. Failure to comply puts both you and the organisation at risk.



CONSEQUENCES OF FAILING TO COMPLY

We take compliance with this policy very seriously. Failure to comply puts both you and the organisation at risk.

The importance of this policy means that failure to comply with any requirement may lead to disciplinary action under our procedures which may result in dismissal. A solicitor in breach of Data Protection responsibility under the law or the Code of Conduct may be struck off.

If you have any questions or concerns about anything in this policy, do not hesitate to contact the CD.

Signed: 

Designation: Managing Director

Date: 20th April 2021

Approved By: N Trevvett

Version: 56000-11

Issue Date: 20th April 2021

Review Date: 20th April 2024



Workplace: Clad Safety Limited

Document: Information Security Policy

Reference: E11

1. INFORMATION SECURITY POLICY STATEMENT

Clad Safety Limited is a privately owned company.

We provide off the shelf workwear, protective equipment and garments for immediate delivery and also manufacture bespoke design workwear to match the specific requirements of our customers in terms of corporate colours and branding.

To this end the company undertakes to:

- Ensure digital information is protected on the company's server network
- Ensure physical security measures are in place
- Confidential data is stored and processed appropriately
- Data and documentation is disposed of safely and securely

1.1 This policy has the endorsement of the Directors of Clad Safety Ltd. This policy will be periodically reviewed by the Managing Director, to ensure that it continues to be relevant to our business.

2. RESPONSIBILITIES

2.1. Managing Director

2.1.1. The Managing Director of Clad Safety Ltd has overall responsibility for Information Security within the company. In particular the he will:

- review the information security policy to ensure the continuing relevance to the company operations
- review the requirements of the business and amend the policy to ensure continuing requirements are met

2.1.2. He shall, from time to time, instruct others to carry out audits or surveillance visits of the activities undertaken by the company in order to assess the effectiveness of these procedures and will maintain the records of such audit or surveillance activity.

2.2. Line Managers

Line Managers have overall responsibility for overseeing that each project undertaken by the company is undertaken in a way that meets the requirements of the policy. They may delegate some or all of the activities to other personnel but retain the overall responsibility.

It is the responsibility of Line Managers to ensure that anyone given delegated responsibility for aspects of information security of any project is adequately trained and experienced to carry out the work.

3. INFORMATION SECURITY POLICY

3.1. Scope

- The head office of Clad Safety Limited
- All staff and contractors of the company

A review of the company's requirements has been undertaken which has identified the following activities as being covered by information security requirements:

- Accounting information
- Marketing database
- CRM databases
- Garment Management System Information
- Backup data
- Laptops and mobile devices
- Wireless network
- VPN
- Email
- Remote Access
- Physical Security

3.2 Risks

3.2.1 The following aspects of the business represent where the Company has identified risks

- Unauthorised access to IT network
- Unauthorised access to paper records
- Unauthorised sharing of sensitive information
- Inappropriate document retention
- Offsite document security

3.3 General Staff Guidelines

3.3.1 Only people who need it for their work should access information covered by this policy

3.3.2 Information should not be shared informally.

3.3.3 Employees should keep all sensitive information secure, by taking sensible precautions and following the guidelines below.

3.3.4 In particular, strong passwords must be used and should never be shared. Passwords are required to be changed every 180 days.

3.3.5 Sensitive information should not be disclosed to unauthorised people, either within the company or externally.



3.3.6 Information should be regularly reviewed and updated if it is found to be out of date. If no longer required, it would be deleted and disposed of.

3.3.7 Secure disposal methods used.

3.4 Information Storage

3.4.1 When information is stored on paper, it should be kept in a secure place where unauthorised people cannot see it.

3.4.2 Where information is usually stored electronically, but has been printed out for some reason: when not in use the paper or files should be kept in a locked drawer or filing cabinet. Printouts should be shredded and disposed of securely when no longer required.

3.4.3 Where information is stored electronically it must be protected from unauthorised access, accidental deletion and malicious hacking attempts. Information should be protected by strong passwords that are changed regularly and never shared between employees. If information is stored on removable media (like a CD or DVD), these should be kept locked away securely when not being used. Information should only be stored on designated drives and servers and should only be uploaded to an approved cloud computing service. Servers containing sensitive information should be sited in a secure location, away from general office space. Information should be backed up frequently. Those backups should be tested regularly, in line with the company's standard backup procedures. Sensitive information should never be saved directly to laptops or other mobile devices like tablets or smart phones. All servers and computers containing data should be protected by approved security software and a firewall.

3.5 Physical Security

3.5.1 The head office building and warehouse is protected by perimeter fencing and gates which are to be secured when the office is un-manned.

3.5.2 CCTV system is in operation and CCTV footage is to be saved and stored appropriately.

3.5.3 Locking up procedures for all building entries to be strictly adhered to.

3.5.4 Software containing sensitive information to be closed when not in use and PC's powered down at the end of the day.

3.5.5 Security alarm system to be activated when building is un-manned.

3.5.6 Sensitive information records to be kept in locked drawers or filing cabinets when not in use.

Signed: 

Designation: Managing Director

Date: 20th April 2021

Approved By: N Trevvett

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Workplace: Clad Safety Limited

Document: Modern Slavery Act 2015 Policy

Reference: E12

COMPLIANCE WITH THE MODERN SLAVERY ACT 2015: POLICY

Clad Safety Ltd is committed to driving out acts of modern day slavery from within its own business and that from within its supply chains. The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organization.

As part of the company's due diligence processes into slavery and human trafficking the supplier approval process will incorporate a review of the controls undertaken by the supplier.

Our recruitment processes are transparent and reviewed regularly. We communicate directly with candidates to discuss job opportunities and to confirm the details of any offer made. We have robust procedures in place for the vetting of new employees and ensure that we are able to confirm their identities and that they are paid directly into an appropriate, personal bank account.

The Company will not support or deal with any business knowingly involved in slavery or human trafficking.

The Company Directors and Senior Management shall take the responsibility for implementing this policy statement.

Signed: 

Designation: Managing Director

Date: 20th April 2021

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Workplace: Clad Safety Limited

Document: Returns Policy

Reference: E13

RETURNS POLICY

We hope that you are delighted with your order. However, if for any reason you are not entirely satisfied, you may return any or all items in their original condition and packaging for a refund within 14 working days from delivery, subject to the following conditions:

- You must inform us of your intention to return the goods to us in writing within 7 days of receiving the goods by sending an email to SALES@CLADSAFETY.CO.UK with a Subject heading of "Order Return". Please include your Order ID in this email and your completed RETURNS FORM which we will send you, and clearly state your reasons (if any) for returning the goods to us. If you wish to return only part of the order then please also clearly state which items you wish to return.
- You must wait for our response by email before returning the goods. We may correspond with you by email to discuss the condition of the goods you wish to return. We will provide you with a Returns Form with a unique Returns Number when we have completed this process with you. You must complete and sign this Returns Form and include it with the package you return to us.
- You must return the goods to us by a registered/recorded delivery service (which requires a signature by the recipient) with suitable carriage insurance to the following address:

Returns Department
Clad Safety Ltd
Bridge House
Wetherby Road
Knaresborough
HG5 8LJ

We cannot accept damaged or lost returns, and reserve the right to refuse your return if you do not send it by registered/recorded mail.

- You must return the goods unused.
- All returned products must be in their original product packaging. If you have opened the product packaging, or you have damaged the packaging so that it cannot be reused, we reserve the right to provide you with a partial refund only. You must retain your original registered/recorded mail receipt in case we require proof of the return in the unlikely event that your return package does not reach us.
- Return carriage is payable by the customer for returns of unwanted items. If an item is faulty Clad Safety will arrange carriage collection by arrangement.

Signed: 

Designation: Managing Director

Date: 20th April 2021

Approved By: N Trevvett

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Workplace: Clad Safety Limited

Document: Cyber Security Policy

Reference: E14

POLICY BRIEF & PURPOSE

Our company cyber security policy outlines our guidelines and provisions for preserving the security of our data and technology infrastructure.

The more we rely on technology to collect, store, and manage information, the more vulnerable we become to severe security breaches. Human errors, hacker attacks and system malfunctions could cause great financial damage and may jeopardize our company's reputation.

For this reason, we have implemented several security measures. We have also prepared instructions that may help mitigate security risks. We have outlined both provisions in this policy.

SCOPE

This policy applies to all our employees, contractors, volunteers, and anyone who has permanent or temporary access to our systems and hardware.

POLICY ELEMENTS

Confidential data

Confidential data is secret and valuable. Common examples are:

- Unpublished financial information
- Data of customers/partners/vendors
- Patents, formulas, or new technologies
- Customer lists (existing and prospective)

All employees are obliged to protect this data. In this policy, we will give our employees instructions on how to avoid security breaches.

Protect personal and company devices

When employees use their digital devices to access company emails or accounts, they introduce security risk to our data. We advise our employees to keep both their personal and company-issued computer, tablet and cell phone secure. They can do this if they:

- Keep all devices password protected.
- Choose and upgrade a complete antivirus software.
- Ensure they do not leave their devices exposed or unattended.

- Install security updates of browsers and systems monthly or as soon as updates are available.
- Log into company accounts and systems through secure and private networks only.

We also advise our employees to avoid accessing internal systems and accounts from other people's devices or lending their own devices to others.

When new hires receive company-issued equipment they will receive instructions for:

- Use of the Anti-Virus and Web Content filtering software
- Use of the password expiration and complexity policy

They should follow instructions to protect their devices and refer to our [Security Specialists/ Network Engineers] if they have any questions.

Keep emails safe

Emails often host scams and malicious software (e.g. worms.) To avoid virus infection or data theft, we instruct employees to:

- Avoid opening attachments and clicking on links when the content is not adequately explained (e.g. "watch this video, it's amazing.")
- Be suspicious of clickbait titles (e.g. offering prizes, advice.)
- Check email and names of people they received a message from to ensure they are legitimate.
- Look for inconsistencies or give-aways (e.g. grammar mistakes, capital letters, excessive number of exclamation marks.)

If an employee is not sure that an email, they received is safe, they can refer to our [IT Specialist.]

Manage passwords properly

Password leaks are dangerous since they can compromise our entire infrastructure. Not only should passwords be secure so they will not be easily hacked, but they should also remain secret. For this reason, we advise our employees to:

- Choose passwords with at least eight characters (including capital and lower-case letters, numbers, and symbols) and avoid information that can be easily guessed (e.g. birthdays.)
- Remember passwords instead of writing them down. If employees need to write their passwords, they are obliged to keep the paper or digital document confidential and destroy it when their work is done.
- Exchange credentials only when necessary. When exchanging them in-person is not possible, employees should prefer the phone instead of email, and only if they personally recognize the person they are talking to.
- Change their passwords every two months.

Remembering many passwords can be daunting. We will purchase the services of a password management tool which generates and stores passwords. Employees are obliged to create a secure password for the tool itself, following the abovementioned advice.

Transfer data securely

Transferring data introduces security risk. Employees must:

- Avoid transferring sensitive data (e.g. customer information, employee records) to other devices or accounts unless necessary. When mass transfer of such data is needed, we request employees to ask our [Security Specialists] for help.
- Share confidential data over the company network/ system and not over public Wi-Fi or private connection.
- Ensure that the recipients of the data are properly authorized people or organizations and have adequate security policies.

Our IT Support Provider need to know about scams, breaches, and malware so they can better protect our infrastructure. For this reason, we advise our employees to report perceived attacks, suspicious emails, or phishing attempts as soon as possible to our specialists. Our IT Support Provider must investigate promptly, resolve the issue, and send a companywide alert when necessary.

Our Security Specialists are responsible for advising employees on how to detect scam emails. We encourage our employees to reach out to them with any questions or concerns.

Additional measures

To reduce the likelihood of security breaches, we also instruct our employees to:

- Turn off their screens and lock their devices when leaving their desks.
- Report stolen or damaged equipment as soon as possible to [HR/ IT Department].
- Change all account passwords at once when a device is stolen.
- Report a perceived threat or possible security weakness in company systems.
- Refrain from downloading suspicious, unauthorised, or illegal software on their company equipment.
- Avoid accessing suspicious websites.

We also expect our employees to comply with our social media and internet usage policy.

Our IT Support Provider should:

- Install firewalls, anti-malware software and access authentication systems.
- Arrange for security training to all employees.
- Inform employees regularly about new scam emails or viruses and ways to combat them.
- Investigate security breaches thoroughly.
- Follow this policies provisions as other employees do.
- Our company will have all physical and digital shields to protect information.



Remote employees

Remote employees must follow this policy's instructions too. Since they will be accessing our company's accounts and systems from a distance, they are obliged to follow all data encryption, protection standards and settings, and ensure their private network is secure.

We encourage them to seek advice from our IT Support Provider.

DISCIPLINARY ACTION

We expect all our employees to always follow this policy and those who cause security breaches may face disciplinary action:


- First-time, unintentional, small-scale security breach: We may issue a verbal warning and train the employee on security.
- Intentional, repeated, or large-scale breaches (which cause severe financial or other damage): We will invoke more severe disciplinary action up to and including termination.

We will examine each incident on a case-by-case basis.

Additionally, employees who are observed to disregard our security instructions will face progressive discipline, even if their behaviour has not resulted in a security breach.

Take security seriously

Everyone, from our customers and partners to our employees and contractors, should feel that their data is safe. The only way to gain their trust is to proactively protect our systems and databases. We can all contribute to this by being vigilant and keeping cyber security top of mind.

Signed: 

Designation: Managing Director

Date: 20th April 2021

Approved By: N Trevvett

Version: 1.3.1

Issue Date: 20th April 2021

Review Date: 20th April 2024



Workplace: Clad Safety Limited

Document: Alcohol and Drugs Policy

Reference: E15

ALCOHOL AND DRUGS POLICY

CLAD SAFETY LTD has drafted this Alcohol and Drug Policy in order to promote a sensible attitude towards alcohol and drugs, and outline its commitment to offer support and assistance to those employees who may need it. It is recognised that, for a variety of reasons, employees could develop alcohol or drug related problems.

CLAD SAFETY LTD is sympathetic to these problems. However, any misuse or abuse of alcohol and drugs presents a serious problem in the workplace. CLAD SAFETY LTD has a responsibility under Health and Safety Law to protect the welfare of all its employees. Employees who drink excessively or take unlawful drugs (including legal highs) are likely to have work accidents, endanger their colleagues, be absent from work, and work less efficiently. For these reasons, the following rules apply to protect our employees from the harmful effects of unlawful drugs and excessive alcohol consumption.

HELP AND ADVICE

When it is known or suspected that an employee has an alcohol or drug related problem, Neil Trevvett is the person designated to provide advice and guidance on how to seek suitable treatment. CLAD SAFETY LTD aims to deal helpfully and sympathetically with any employees' problems with substance dependency. The initial aim of any discussions will be to offer constructive assistance and support. Such discussions will remain strictly confidential.

Appropriate help will be offered to any employee who has an alcohol or drug problem. If this problem affects this employee's conduct or performance at work, and they refuse to accept the guidance and help that is offered, the matter will be referred for action under normal disciplinary procedures. Similarly, any employee who undergoes counselling and rehabilitation, and later suffers a relapse in conduct and performance will, after review and evaluation, be dealt with through disciplinary channels.

COMPANY EXPECTATIONS

The consumption or possession of alcohol or drugs on company premises is strictly forbidden. Staff must never drink alcohol or take drugs (including legal highs) if they are required to drive any vehicles on company business, or when they are on call or operational standby.

Employees must never drink alcohol or consume drugs immediately before coming to work, or be still under the influence during working hours. If an employee comes to work with a hangover and the health and safety of colleagues is compromised, then that employee may also be subject to disciplinary proceedings. The same applies to being under the influence of drugs, or buying, selling or being in possession of illegal substances on company premises.




CLAD SAFETY LTD has no desire to impinge upon any employee's freedom to consume alcohol out of normal working hours and away from company premises. CLAD SAFETY LTD will only deem there to be a problem when, due to the excessive regular consumption of large amounts, an employee's attendance, performance or conduct becomes erratic.

If employees attend social business/client functions outside of working hours and are representing the company, then they are expected to moderate their drinking, and stay well within the legal limit if driving. Consuming drugs on these occasions is strictly forbidden.

CONSEQUENCES OF NON-COMPLIANCE

Failure to adhere to these company expectations will amount to a disciplinary offence and, as such, normal company disciplinary procedures will apply. Should the offence be of a serious nature, then it may be viewed as gross misconduct, resulting in the employee's summary dismissal.

Under such circumstances, CLAD SAFETY LTD reserves the right to escort the employee from its premises for the remainder of the day or work shift. CLAD SAFETY LTD also reserves the right to carry out random alcohol and drug screening tests on employees in the workplace. A positive test result, or unreasonable refusal to take the test, will also be viewed as potential gross misconduct, and result in severe disciplinary action in accordance with the company's disciplinary procedure. Dismissal is a likely outcome in the most serious of cases.

Signed: 

Designation: Managing Director

Date: 20th April 2021

Approved By: N Trevvett

Version: 1.3

Issue Date: 20th April 2021

Review Date: 20th April 2024

Workplace: Clad Safety Limited

Document: Labour Standards Policy

Reference: E16

LABOUR STANDARDS POLICY

Clad Safety Limited (the Company) is a long standing Workwear and PPE manufacturer and distributor, with over 30 years of experience, serving a number of industries including utilities, rail and the emergency services. Resulting from our business operations, the Company acknowledges its obligations towards its employees, stakeholders and the communities in which it works, and has outlined below its policy in relation to labour standards.

This policy is relevant to the Company itself, our contractors, sub-contractors, suppliers, freelancers, members of the public and other parties engaged with the Company's business.

MINIMUM LABOUR STANDARDS

The Company has identified the following compelling reasons to establish a comprehensive system of minimum labour standards to guide its business operations:

1. **Ethical Responsibilities** - the Company acknowledges its obligations towards its employees, stakeholders and the communities in which we work and operate. The Company wishes to carry out work and to do business in an ethical fashion.
2. **Adverse Publicity and Damage to the Company's Reputation** – adverse publicity from the discovery of poor labour standards within the Company's business operations presents reputational and structural risks to the Company not only in terms of revenue, but also in respect of staff recruitment and retention. Poor labour standards can also lead to a loss of trust and confidence with suppliers and also within the wider community. The Company therefore wants to do what is right and be seen to do what is right.
3. **Reduced Quality of Service** – the Company recognises that there is commonly a link between poor labour standards and poor quality of services. To this end, it is in the interest of the Company to ensure that the Company reaches and exceeds minimum labour standards requirements at all times.

To help identify a defined set of minimum labour standards, the Company has referred to the following resources:

Social Accountability International's SA8000 document
The UN's Universal Declaration of Human Rights
European Convention Human Rights
Human Rights Act 1998

These minimum labour standards are:

1. **Child Labour** – the Company does not and will not engage in or support the use of child labour. If the Company engages any young workers (e.g. on work experience), it will ensure that a suitable risk assessment is carried out and that young persons are not exposed to any hazardous conditions, or in any case work more than 8 hours per day. The Company respects and supports children's rights consistent with the United Nations Convention on the Rights of the Child (CRC) and the Children's Rights and Business Principles (CRBP).
2. **Forced or Compulsory Labour** – the Company shall not engage in or support the use of forced or compulsory labour, or bonded or involuntary prison labour. Employees are free to leave after providing reasonable notice in line with their individual contracts of employment.
3. **Health and Safety** – the Company shall provide a safe and healthy workplace environment and shall take effective steps to prevent potential accidents and injuries to employee's health by minimising, so far as is reasonably practicable, and in cooperation with its employees, workers and other members of staff, the causes of hazards inherent in the workplace. All employees will receive safety and job specific health and safety instructions during the course of their employment with the Company. Employees shall have access to clean sanitary facilities and drinking water. Responsibility for implementing the Health and Safety element of this policy is assigned to the Company Human Resources Director. (Please refer to Clad Safety's Health and Safety Policy).
4. **Freedom of Association** – freedom of association is respected and the Company will comply with UK and the Republic of Ireland labour relations legislation (as appropriate) in this regard.
5. **Discrimination** – the Company shall not engage in or support any discriminatory practices in recruitment, remuneration, access to training, promotion, termination or retirement based on gender (including gender reassignment), marital status, family status, religious belief, disability, age, racial grounds (race, colour, nationality or ethnic origin, including membership of the traveller community), sexual orientation or other conditions that could give rise to discrimination. The Company has in place an Equal Opportunities Policy which is provided to all new employees at induction. (Please refer to Clad Safety's Equal Opportunities Policy).
6. **Disciplinary Practices** – the Company shall treat all employees and members of staff with dignity and respect. The Company shall not engage in or tolerate the use of corporal punishment, mental or physical coercion, harassment, intimidation or verbal abuse of personnel. No harsh or inhumane treatment is allowed and the Company shall ensure that no disciplinary procedure is operated.
7. **Working Hours** – the Company shall comply with applicable laws and industry standards on working hours and holiday entitlements. The Company's normal working hours do not exceed 48 hours per week, and overtime hours do not exceed 12 hours per week, with the relevant periods of rest similarly observed. The Company ensures that all employees have the legal right to be employed in the UK or the Republic of Ireland (as appropriate).

8. Remuneration - the Company shall comply with national laws and regulations with regard to wages and benefits. All work related activities are carried out on the basis of a recognised employment relationship established according to national law and practice. All members of staff are remunerated in a way which is in excess of the national minimum wage in the UK or the Republic of Ireland as is appropriate. The Company is committed to the Living Wage for staff other than those on formalised training programmes.


The Company also commits to:

- Compliance with relevant legal and other requirements to which the Company subscribes;
- Ensuring that all our key contractors, sub-contractors and suppliers are aware of this policy; and
- Making available sufficient resources for the implementation of this policy.

REVIEW

The Company commits to periodically reviewing this policy in order to continually improve labour standards within the workplace. The Company shall take into consideration: changes in legislation, legal advice as necessary and any other requirements to which the Company subscribes, to ensure the adequacy, suitability and continuing effectiveness of this policy.

The Company will make this policy publicly available (specifically via our website – www.cladsafety.co.uk) and the policy will also be communicated to Clad Safety's employees in the first instance, and also to all contractors, sub-contractors and suppliers.

Signed: 

Designation: Managing Director

Date: 20th April 2021

Approved By: N Trevvett

Version: 1.3

Issue Date: 20th April 2021

Review Date: 20th April 2024

Workplace: Clad Safety Limited

Document: Social Value Policy

Reference: E17

SOCIAL VALUE POLICY

Clad Safety Ltd are a leading UK supplier of Personal Protective Equipment (PPE) with more than 30 years of experience, operating from our head office in Knaresborough and employing 22 people. The purpose of this policy is to communicate to all Clad Safety's stakeholders our approach to acting in a socially, sustainable, and responsible manner. Whilst we are not bound by the Public Services (Social Value) Act 2012, we recognise its significance and implement the Act into how we do business.

Employment and Skills:

- Providing our employees with new skills for the future.
- Creating employment opportunities within the communities we work.
- We are intent on increasing the diversity of our workforce to improve our own resilience and our ability to innovate.
- Offering apprenticeships, external and in-house training.

Community Engagement:

- Partnering with local and national charities on key themes to deliver additional benefits to the communities in which we work.
- Working with education and training providers to offer curriculum support and work experience opportunities.
- Supporting and encouraging our staff to live healthier lives.

Environment:

- Promoting sustainable and ethical procurement.
- Acknowledging our responsibility to reduce air pollution, noise, and nuisance within our local communities to improve health.
- Using resources efficiently to reduce waste and maximise value.

Compliance, Measurement & Reporting:

- Maintaining clear accountability for delivering this policy.
- Continuously improving our standards, efficiency, and effectiveness.
- Monitoring and reporting our social value impact by using recognised tools.
- Report internally on learning and development, supply chain, diversity and inclusion and workforce inclusion, diversity, and wellbeing, these will be monitored at Company Director level



Clad Safety Ltd intend to use this policy to actively pursue a policy of promoting and implementing social value within our company. We will communicate this policy to our employees, supply chain partners and relevant interested parties and review it on an annual basis.

Signed: 

Designation: Managing Director

Date: 20th April 2021

Approved By: N Trevvett

Version: 1.3

Issue Date: 20th April 2021

Review Date: 20th April 2024

Workplace: Clad Safety Limited

Document: Quality Policy

Reference: E18

QUALITY POLICY

Clad Safety Limited specialises in the supply of corporate apparel, personal and workplace safety equipment in line with the appropriate national and international standards and the management of logo design and application.

The effectiveness of the Quality Management System will be achieved through:

- Consideration of the context of the organization and aligning the Quality Management System with the strategic direction of Clad Safety Limited .
- Satisfying customer and applicable statutory and regulatory requirements
- Management of the organization, along with employee-established quality objectives and defined responsibilities for their fulfillment
- Establishing, applying, maintaining and continual improvement of the effectiveness of Quality Management System in accordance with the international Standard ISO 9001:2015
- Continual enhancement of customers' satisfaction
- Tracking and applying new technologies and educating employees
- Careful selection and assessment of suppliers
- Commitment to increase the quality of products and services in order to completely satisfy customers' expectations
- Making continuous improvement a part of every day and throughout every activity
- Continuously improving the Quality Management System in all process activities of the business.

This company undertakes to supply only safety equipment and/or related services that fully comply with the standards and regulations and claims made relating to those products and/or related services.

Where appropriate, this company will maintain up to date technical files and associated documentation to ensure that regulatory compliance information can be supplied upon request. Where products are sourced from external organisations which hold technical files relating to the products being offered, this company will request confirmation that these files are current, complete, contain appropriate conformity assessment information and, where relevant, regulatory compliance certificates and will take all necessary steps to confirm the validity of the compliance documentation held by that external supplier in respect of the products being sourced.

Where services are provided related to safety equipment sourced from external organisations, this company will maintain approval from the manufacturer that the services provided are assessed and approved by the external organisation.



This Quality Policy is communicated to all persons working for or on behalf of the organization and is made available to the public if requested.

This Policy is endorsed by the Executive Management of Clad Safety Limited .

Signed: 

Designation: Managing Director

Date: 20th April 2021

Approved By: N Trevvett

Version: 2.0-17-IMS

Issue Date: 20th April 2021

Review Date: 20th April 2024



Workplace: Clad Safety Limited

Document: Environmental Policy

Reference: E19

ENVIRONMENTAL POLICY

Clad Safety Limited specialises in the supply of corporate apparel, personal and workplace safety equipment in line with the appropriate national and international standards and the management of logo design and application.

Considering the purpose and context of the organization, and the condition of the environment in which the Clad Safety Limited operates, the management of the organization is committed to the continual improvement of the Environmental Management System, according to compliance obligations, by following the principles and requirements of the ISO 14001:2015 Standard.

The framework for setting environmental objectives is defined in the Integrated Quality and Environmental Manual.

All employees of Clad Safety Limited are acting to protect the environment by preventing and eliminating environmental pollution through:

- Continual education in order to prevent environmental pollution, preserve natural resources, and improve the Environmental Management System
- Continual raising of environmental awareness
- Exploration of new materials with smaller environmental footprints and improvement of hazardous waste management
- Decrease of nonrenewable energy consumption and replacement with renewable energy sources
- Activities that emerge from the context of the organization
- Following environmental procedures in order to decrease environmental pollution, and prevent degradation and damage to the environment
- Decrease of adverse impact on water, soil, air, and biodiversity.

This Environmental Policy is communicated to all persons working for or on behalf of the organization and is made available to the public if requested.

This Policy is endorsed by the Executive Management of Clad Safety Limited.

Signed: 

Designation: Managing Director

Date: 20th April 2021

Approved By: N Trevvett

Version: 1.3-18-IMS

Issue Date: 20th April 2021

Review Date: 20th April 2024



Workplace: Clad Safety Limited

Document: Health and Safety Policy

Reference: E20

HEALTH AND SAFETY POLICY

Clad Safety Limited specialises in the supply of corporate apparel, personal and workplace safety equipment in line with the appropriate national and international standards and the management of logo design and application.

PURPOSE AND SCOPE

Clad Safety Limited recognizes its legal and moral responsibility to provide a safe and healthy workplace and to protect the health, safety and welfare of its employees and other persons at the workplace. Our Policy drives the prevention of injury and illness in our business with the commitment of the Directors and senior management.

HEALTH AND SAFETY OBJECTIVES

- To proactively target known sources of injury and illness and prevent them from occurring
- To provide adequate resources to maintain an effective health and safety program
- To ensure all employees are instructed and trained in organizational health and safety procedures, foreseeable hazards and risk controls
- To comply with the Health and Safety Act and applicable Regulations
- To consult with employees on health and safety issues both directly and through the Health and Safety Committee
- To exercise due diligence by taking reasonable steps to acquire and keep current information on work health and safety matters
- To ensure that all employees and other persons at the workplace take reasonable care for their own health and safety and that of others who may be affected by their actions or omissions
- To establish, implement, maintain and continually improve the effectiveness of health and safety in accordance with the requirements of ISO 45001:2018

Management and all employees are expected to work cooperatively to effectively implement this Policy.

This Health and Safety Policy is communicated to all persons working for or on behalf of the organization and is made available to the public if requested.

This Policy is endorsed by the Executive Management of Clad Safety Limited.

Signed: 

Designation: Managing Director

Date: 20th April 2021

Approved By: N Trevvett

Version: 1.3-19-IMS

Issue Date: 20th April 2021

Review Date: 20th April 2024



Workplace: Clad Safety Limited

Document: Ethical Supply Chain Policy

Reference: E21

ETHICAL SUPPLY CHAIN POLICY

(A) Goods Procured from Outside the UK

Clad Safety believe that a robust and efficient supply chain requires us to have multiple suppliers in different locations around the world, capable of producing the same specification and design of garment, utilising the same fabrics and components. This avoids any risk of non-supply due to lack of resources, local or regional labour issues or weather factors.

We therefore maintain a strong supply chain with approved factories in China, Tunisia, Turkey, Poland (and UK). We work closely with affiliated distributor companies in Australia and New Zealand and Europe under the brand of Uniwear Global www.uniwear-global.com and accredited factory sources and fabric stocks are shared between these companies to ensure a complete back up service in the event of a shortage of supply.

We visit and inspect our suppliers to ensure 100% compliance with relevant local H&S, Social Accountability and Welfare regulations. Before entering into a contract with Clad Safety all suppliers are required to complete a Supplier Questionnaire which covers all aspects of technical and regulatory compliance. This also requires the supplier to maintain confidentiality and not to provide information to any 3rd party regarding the nature of our supply agreements or the names any of our customers or product information which could compromise the integrity of the approved product in the marketplace. Clad Safety operates a strict Ethical Policy following the ETI Base Code and WRAP guidelines. Clad Safety is genuinely concerned to improve the welfare and wellbeing of all our staff and our supply partners.

One prominent supplier is a factory in Tunisia that has been ISO 9001 approved for some 10 years and constantly upgrades all procedures and working methods to ensure best practice in all areas of its operation. The work ethic is strong, absenteeism light and the factory trains and retains its labour by having a good reputation for constant work, on-time wage payments, good working practices and a strong Ethical Trading background. The factory are in the process of becoming BSI certified and are visited by the Fair Wear Foundation, an organisation working with over 120 brands, such as Jack Wolfskin, and industry influencers to improve working conditions where clothing is made.

Clad Safety are committed to ensuring that every product supplied has been produced in a way which fully complies with the ethical standards set out in SA8000 Social Accountability Standard and also that every component in the garment has been checked for and does not contain restricted substances.

Restricted substances can be present in many textile and consumer products, they get into the product predominately from the manufacturing process and are harmful to humans in many different ways. They may be carcinogenic, toxic, cause irritation or allergic reactions to those people sensitive to it. In some cases the history of harm may not be to humans, it may be that it presents a danger to the environment that surrounds

us. Restricted substances can include: Nickel, Formaldehyde, pH, Azo Dyes, Disperse Dyes, Phthalates, PCP's, APEO/NPEO, Flame Retardants, Heavy Metals, Organo Tin Compounds. This list is by no means complete, the product will also determine which restricted substances may be present.

Our own quality procedures are managed and audited annually by ISOQAR. Copies of certificates and other working documents can be provided on request. Overseas suppliers based in Asia are routinely inspected by third party auditors: www.AsiaInspection.com who provide a detailed report showing both the Factory compliance of product quality conformity. Clad Safety are very happy to share the full details of any particular factory audit with its customers or indeed to carry out a new test inspection/audit using an auditor chosen by its customers to ensure absolute transparency and fairness on this point.

Clad Safety treat ethical and social issues as the highest priority and we are fully aware of concerns with the general public surrounding the poor monitoring and control of garment production in the Far East which has led to disastrous consequences in recent years in Bangladesh. Clad Safety have never used any factory which has been involved in child labour or forced labour and has never had to withdraw from a supply agreement due to a failure in ethical or social accountability.

Every new product is subjected to a number of tests (depending on the end use and complexity of the hazards involved). These tests are carried out at an independently accredited laboratory in Leeds called High Street Textile Testing Services Ltd www.hstts.co.uk HSTTS provide comprehensive reporting to relevant BS/EN standards and are always willing to explain the significance of any test result and how to improve the result. Typical tests include ISO5077, ISO105 (C06/E04/X12) 13937, 13934.

Once a new product has been satisfactorily tested and the final spec agreed with both the client and the factory, a sealed sample is held in stock for reference at the factory and at Clad Safety. As further batches are produced, each delivery is QC checked against the sealed sample to ensure that there is no deviation from the agreed standard. Where there is any deviation the batch is quarantined and the supplier is notified immediately and requested to collect the goods and replace without delay.

Clad Safety also requests independent audit information from suppliers, an example of which is attached "Intertek Reports - supplier audit report - Kariwala"

(B) Goods Procured from Inside the UK

Before entering into a contract with Clad Safety all suppliers are required to complete a Supplier Questionnaire which covers all aspects of technical and regulatory compliance. This also requires the supplier to maintain confidentiality and not to provide information to any 3rd party regarding the nature of our supply agreements or the names any of our customers or product information which could compromise the integrity of the approved product in the marketplace. Clad Safety operates a strict Ethical Policy following the ETI Base Code and WRAP guidelines.

Every new product is subjected to a number of tests (depending on the end use and complexity of the hazards involved). These tests are carried out at an independently accredited laboratory in Leeds called High Street Textile Testing Services Ltd www.hstts.co.uk HSTTS provide comprehensive reporting to relevant BS/EN



standards and are always willing to explain the significance of any test result and how to improve the result. Typical tests include ISO5077, ISO105 (C06/E04/X12) 13937. 13934.

Once a new product has been satisfactorily tested and the final spec agreed with both the client and the factory, a sealed sample is held in stock for reference at the factory and at Clad Safety. As further batches are produced, each delivery is QC checked against the sealed sample to ensure that there is no deviation from the agreed standard. Where there is any deviation the batch is quarantined and the supplier is notified immediately and requested to collect the goods and replace without delay.

Signed: 

Designation: Managing Director

Date: 20th April 2021

Approved By: N Trevvett

Version: 1.3.1

Issue Date: 20th April 2021

Review Date: 20th April 2024



Workplace: Clad Safety Limited

Document: Anti-Facilitation of Tax Evasion Policy

Reference: E22

ANTI-FACILITATION OF TAX EVASION POLICY

1. Introduction

The Criminal Finances Act 2017 made it a corporate criminal offence for an entity to fail to prevent the criminal facilitation of tax evasion. Consequently, Clad Safety Ltd has adopted this policy which governs all its business dealings.

This policy should also be read against the background of HMRC's approach to VAT fraud, often known as "missing trader" or "carousel" frauds.

2. Policy statement

The Company is firmly against all forms of tax evasion, whether under UK law or under the law of any foreign country.

Employees, agency workers, consultants and others acting on behalf of the Company must not undertake any transactions which:

- a) Cause the Company to commit a tax evasion offence; or
- b) Facilitate a tax evasion offence by a third party.

The Company is committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter tax evasion facilitation.

The Directors of Clad Safety Ltd are responsible to ensure that this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

3. Facilitation of tax evasion

Tax evasion means an offence of cheating the public revenue by fraudulently evading tax and is a criminal offence. The offence requires an element of fraud which means that there must be deliberate action, or omission with dishonest intent.

This policy applies to all types of tax evasion, regardless of whether it is UK taxes or foreign taxes that have been evaded.

Tax evasion facilitation means being knowingly concerned in, or taking steps with a view to, the fraudulent

evasion of tax (whether UK tax or tax in a foreign country) by another person, or aiding, abetting, counselling or procuring the commission of that offence. Tax evasion facilitation is a criminal offence where it is done deliberately and dishonestly. It is also considered to be tax evasion facilitation if an individual has suspicions that tax evasion could be occurring but does not act on these suspicions.

Tax means all forms of taxation including but not limited to corporation tax, income tax, value added tax, stamp duty land tax, national insurance contributions and includes duty and any other form of taxation (however described).

4. Unacceptable Actions of Employees and Agents

- a) Engage in any form of facilitating tax evasion or foreign tax evasion; or
- b) Aid or abet others in committing a tax evasion offence or foreign tax evasion offence; or
- c) Fail to report promptly any request or demand from any third party to facilitate the fraudulent evasion of tax by another person; or

5. Prevention


The best defence against a charge of tax evasion and its facilitation is the vigilance of our employees and a common-sense approach supported by a clear procedure for reporting anything suspicious. Applying common sense includes being aware of:

- a) commercial relationship being set up outside the scope and process of standard terms and conditions.
- b) unusual payment method; and
- c) unusual relationship between the agent and the third party (usually the customer).

	Activity	Preventive Measures
1	Fraudulent Evasion of VAT	Check genuineness of VAT numbers provided by suppliers
2	Diversion of Supplier Payments	Check bank account details of suppliers and especially any request to change bank details
3	Illicit relationships between individual employees/agents and customers	Check prices and margins agreed, types of goods being sold and ensure every purchase order carries a company reference
4	Irregular Payments or Methods	Ensure that no payments are made in cash or without proper documentation, dual signature authorisation and monitoring of all payments by FD.
5	Physical Theft of the Company's Goods	Regular monitoring of all stock movements and GP margins.



ANTI-FACILITATION OF TAX EVASION POLICY

Signed: 

Designation: Managing Director

Date: 16th June 2022

Approved By: N Trevvett

Version: 1.1.1

Issue Date: 16th June 2022

Review Date: 16th June 2025



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