

Clad Safety Policy Documents



Workplace: Clad Safety Limited

Document: Bribery and Corruption Policy

Reference: E04

1. Purpose

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the Company's business is conducted in a socially responsible manner.

2. Policy statement

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption. We are 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 bribery.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and a fine. If we are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

3. Scope

3.1 Who is covered by the policy?

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

This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as employees in this policy).

This policy covers:

- Bribes;
- Gifts and hospitality;
- Facilitation payments;
- Political contributions;
- Charitable contributions.



3.2 Bribes

Employees must not engage in any form of bribery, either directly or through any third party (such as an agent or distributor).

3.3 Gifts and hospitality

Employees must not offer or give any gift or hospitality:

- Which could be regarded as illegal or improper, or which violates the recipient's policies
- Unless approved in writing by the managing director

Employees may not accept any gift or hospitality from our business partners:

- If it is in cash
- If there is any suggestion that a return favour will be expected or implied
- Unless approved in writing by the managing director

If it is not appropriate to decline the offer of a gift, the gift may be accepted, provided it is then declared to the managing director and donated to charity.

3.4 Political Contributions

We do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

3.5 Charitable contributions

Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the managing director. All charitable contributions should be publicly disclosed.

4. Your responsibilities

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify the managing director as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred, or may occur in the future.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

5. Record-keeping

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



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

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

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

6. How to raise a concern

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries or concerns, these should be raised with the managing director.

7. What to do if you are a victim of bribery or corruption

It is important that you tell the managing director as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

8. Protection

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

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

9. Training and communication

Training on this policy forms part of the induction process for all new employees. All existing employees will receive regular, relevant training on how to implement and adhere to this policy. In addition, all employees will be asked to formally accept conformance to this policy on an annual basis.

Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

10. Who is responsible for the policy?



The managing director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Managers have primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

11. Monitoring and review

Management will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

This policy does not form part of any employee's contract of employment and it may be amended at any time.

Signed: 

Designation: Managing Director

Date: 28th March 2025

Approved By: N Trevvett

Version: 2

Issue Date: 28th March 2025

Review Date: 28th March 2026



COUNTERFEIT, FRAUDULENT AND SUSPECT ITEMS POLICY AND STATEMENT

Workplace: Clad Safety Limited

Document: Counterfeit, Fraudulent and Suspect Items Policy and Statement

Reference: E05

Purpose

The purpose of this policy is to define how Clad Safety Limited manage the risk of Counterfeit Fraudulent and Suspect Items (CFSI) from entering the supply chain.

The aim is to establish and maintain robust arrangements and culture, to mitigate the risk of CFSI impacting Clad Safety Limited, our customers and interested parties.

Scope

This policy applies to all persons involved in the specification, sourcing, purchase, receipt, inspection, and despatch of goods.

Policy

Clad Safety Limited will mitigate the risk of CFSI entering the supply chain by ensuring all 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. 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 approved source of the goods that we require.

- employees involved in the purchasing of goods are aware about the potential for CFSI
- suppliers are evaluated and approved through a documented process
- incoming product accompanied by certification 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
- product may be tested to meet the requirements of international standards. Product identified as non-conforming is isolated, quarantined and disposed of accordingly
- All documentation is checked and approved prior to despatch, and product is certified in line with our ISO9001 accreditation

Signed: 

Designation: Managing Director

Date: 28th March 2025

Approved By: N Trevvett

Version: 1.3

Issue Date: 28th March 2025

Review Date: 28th March 2026

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 our Business Continuity & Disaster Recovery Plan for further details.

Signed: 

Designation: Managing Director

Date: 28th March 2025

Approved By: N Trevvett

Version: 2

Issue Date: 28th March 2025

Review Date: 28th March 2026

Workplace: Clad Safety Limited

Document: Equal Opportunities & Diversity Policy

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 age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (Protected Characteristics). 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

- Mr R 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: 28th March 2025



Approved By: N Trevvett

Version: 2

Issue Date: 28th March 2025

Review Date: 28th March 2026

Workplace: Clad Safety Limited

Document: General Data Protection Regulation Policy

Reference: E10

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: 28th March 2025

Approved By: N Trevvett

Version: 2

Issue Date: 28th March 2025

Review Date: 28th March 2026

Workplace: Clad Safety Limited

Document: Information Security Policy

Reference: E11

Statement of Policy

1. Clad Safety Limited (the Employer, we or our) is committed to the highest standards of information security and treats data security and confidentiality extremely seriously.
2. This Policy and the rules contained in it apply to all staff of the Employer, irrespective of seniority, tenure and working hours, including all employees, directors and officers, consultants and contractors, temporary and agency workers, trainees, casual and fixed-term staff, apprentices, interns and any volunteers (Staff or you).
3. All Staff must familiarise themselves with this Policy and comply with its terms.

Purpose of Policy

4. In relation to personal data, under the UK General Data Protection Regulation (the UK GDPR), the Employer must:
 - a) ensure the security of personal data, including protection against any unlawful or unauthorised data processing and accidental loss, damage or destruction, by utilising appropriate technical or organisational measures;
 - b) demonstrate the consideration and integration of data compliance measures into the Employer's data processing activities, by implementing appropriate technical or organisational measures; and
 - c) be able to demonstrate the use and implementation of such appropriate technical or organisational measures.
5. The purpose of this Policy is to:
 - a) protect against any potential breaches of confidentiality;
 - b) protect the Employer's informational assets and IT systems and facilities against any loss, damage or misuse;
 - c) supplement the Employer's Data Protection and Security Policy in ensuring that Staff are aware of and comply with UK laws and the Employer's policies and procedures on the processing of personal data; and
 - d) raise awareness of and clarify the responsibilities and duties of Staff in respect of information security, data security and confidentiality.
6. This is a statement of policy only and does not form part of your contract of employment. The Employer may amend this Policy at any time, in our absolute discretion, and we will do so in accordance with our data protection and other obligations.

A new copy of the Policy will be circulated whenever it is changed.

7. For the purposes of this Policy:

- a) Business Information means any of the Employer's business-related information other than personal data about customers, clients, suppliers and other business contacts;
- b) Confidential Information means any trade secrets or other confidential information (belonging to the Employer or third parties) processed by the Employer;
- c) Personal Data means any information that relates to an individual who can be identified from that information, either directly or indirectly; and
- d) Sensitive Personal Data means information about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership (or non-membership), health, sex life, sexual orientation, genetic information or biometric information (where this is used to identify an individual).

Roles and Responsibilities

8. All Staff have a responsibility for information security. The Employer's Data Protection Officer (DPO) has overall responsibility for this Policy. Specifically, they must:

- a) implement and maintain this Policy;
- b) monitor potential and actual security breaches;
- c) ensure Staff are aware of their responsibilities in relation to information security and confidentiality; and
- d) ensure compliance with the UK GDPR and all other relevant legislation and guidance.

Scope of This Policy

9. This Policy covers all written, verbal and digital information held, used or transmitted by or on behalf of the Employer, irrespective of media. This includes, but is not limited to:

- a) paper records;
- b) hand-held devices;
- c) telephones;
- d) information stored on computer systems; and
- e) information passed on verbally.

10. The information covered by this Policy may include:

- a) Personal Data relating to Staff, customers, clients or suppliers;
- b) other Business Information; and
- c) Confidential Information.

11. This Policy supplements the Employer's Data Protection and Security Policy and other policies relating to data protection, internet, email and communications, and document retention, including the Employer's:

The content of these policies must be considered and taken into account alongside this Policy.

General Principles

12. All information must be:

- a) treated as commercially valuable; and
- b) protected from loss, theft, misuse or inappropriate access or disclosure.

13. Through the use of appropriate technical and organisational measures all Personal Data, including Sensitive Personal Data, must be protected against:

- a) unauthorised and/or unlawful processing; and
- b) accidental loss, destruction or damage.

14. Staff and line managers should discuss what security measures (including technical and organisational measures) are appropriate and which exist to protect any information accessed by Staff in the course of employment.

15. Any information, apart from Personal Data, is owned by the Employer and not by an individual or team.

16. Any information must only be used in connection with work being undertaken for the Employer. It must not be used for any other personal or commercial purposes.

17. Any Personal Data must only be processed for the specified, explicit and legitimate purpose for which it is collected.

Information Management

18. Any Personal Data must be processed in accordance with:

- a) the data protection principles;
- b) the Employer's policies on data protection generally (including the Data Protection and Security Policy); and
- c) the Employer's other relevant policies.

19. All Personal Data collected, used and stored must be:

- a) adequate, relevant and limited to what is necessary for the relevant purposes; and
- b) kept accurate and up to date.

20. The Employer will take appropriate technical and organisational measures to ensure that Personal Data is kept secure and protected against unauthorised or unlawful processing, and against accidental loss, destruction or damage. These measures include:

- a) The encryption of Personal Data.
- b) Dual-factor authentication.
- c) The use of strong passwords.

21. Any Personal Data and Confidential Information must not be kept any longer than is necessary and will be stored and destroyed in accordance with our policies on data retention.

Human Resources (HR) Information

22. Due to the internal confidentiality of personnel files, access to these files and any information contained therein is limited to the HR Department. Non-HR Staff are not authorised to access HR information, except as provided for in any individual roles.

23. Personnel information must also be kept strictly confidential by any Staff involved in:

- a) the recruitment process;
- b) a management role; or
- c) a supervisory role.

24. Under the UK GDPR and other relevant legislation, Staff may ask to see their personnel files and obtain access to any other Personal Data about them.

Access to Offices and Information

25. All office doors, office keys and access codes must, at all times, be kept secure. Office keys and access codes must at no time be given to or communicated to any third parties.

26. All documents containing and any equipment displaying Confidential Information should be placed and positioned so that anyone passing by cannot see them (e.g. through office windows or glass doors).

27. Any visitors must:

- a) sign it at reception;
- b) be accompanied by Staff at all times; and
- c) not be left alone in areas or situations where they may have access to Confidential Information.

28. Meetings with visitors must, where possible, take place in meeting rooms. If a visitor meeting takes place outside a meeting room, in an office or other room containing Employer information, steps must be taken to ensure no Confidential Information is visible and accessible to the visitors.

29. All paper documents, backup systems and devices containing Confidential Information must be securely locked away:

- a) whenever desks are unoccupied; and
- b) at the end of the working day.

Computers and IT

30. Where available on our systems, password protection and encryption must be used to maintain confidentiality.

31. All computers and other electronic devices must be password protected. Such passwords must be changed regularly and must not be recorded anywhere (e.g. written down) or made available to others.

32. To minimise the risk of accidental loss or disclosure, all computers and other electronic devices must be locked when not in use, including when left unattended at a desk.

33. All data held electronically must be securely backed up as soon as possible in accordance with the Employer's internal backup procedure.

34. Confidential Information must not be copied onto removable hard drives, CDs or DVDs, floppy disks or memory sticks, without the express permission of the IT Department. Any Personal Data held on such devices must, as soon as possible, be transferred to the Employer's computer network to be backed up and then deleted from the device.

35. Staff must:

- a) ensure that they do not introduce viruses, malware or malicious codes onto the Employer's systems.
- b) not install or download from the internet any software without it first being checked for viruses.

Staff should speak to the IT Department for more information and guidance on appropriate steps to be taken to ensure compliance.

Communications and Transfer of Information

36. When speaking in public places (e.g. when speaking on a mobile phone), Staff must take care in maintaining confidentiality.

37. Confidential Information must be marked 'strictly private and confidential' and circulated only to those who need to know the information in the course of their work

38. Confidential Information must not be removed from the Employer's offices (and systems) unless required for authorised business purposes, and then only in accordance with the subsequent paragraph.

39. If the removal of Confidential Information from the Employer's offices is permitted, all reasonable steps must be taken to maintain the confidentiality and integrity of the information. This includes, but is not limited to, Staff ensuring that Confidential Information is:

- a) stored with strong password protection, with devices and files kept locked when not in use;
- b) not transported in see-through or other unsecured bags or cases, when in paper copy;
- c) not read in public places when working remotely (e.g. in waiting rooms or on trains); and
- d) not left unattended or in any place where it is at risk (e.g. in airports or conference centres).

40. Care must be taken to verify all postal and email addresses before any information is sent to them. Particular care must be taken when checking and verifying email addresses where auto-complete features may have inserted incorrect email addresses.

41. Before being sent by email or recorded delivery, all sensitive or particularly confidential information should be encrypted.

Personal Email and Cloud Storage Accounts

42. Personal email accounts (e.g. Google, Hotmail and Yahoo) and cloud storage services (e.g. Google Drive, iCloud and OneDrive) are vulnerable to hacking and do not provide the same level of security as the services provided by the Employer's IT systems.

43. Staff must not use personal email accounts or cloud storage accounts for work purposes.

44. If large amounts of data need to be transferred, Staff should speak to the IT Department.

Working From Home

45. Unless required for authorised business purposes, and then only in accordance with the subsequent paragraph, Staff must not take information home with them.

46. Where information is permitted to be taken home, Staff must ensure that appropriate technical and practical measures are in place within the home to maintain the continued security and confidentiality of that information. In particular, all Confidential Information and Personal Data must be:

- a) kept in a secure and locked location, where it cannot be accessed by others (including family members and guests); and
- b) retained and disposed of in accordance with paragraph 21 above.

47. Staff must not store any Confidential Information on their home computers or other devices (e.g. laptops, PCs or tablets).

Transfers to Third Parties

48. Third party service providers should only be engaged to process information where appropriate written agreements are in place to ensure that they offer appropriate data protection, confidentiality and information security protections and undertakings. Care must be taken to consider whether any such third party service providers will be considered data processors for the purpose of the UK GDPR.

49. Staff involved in the process of setting up new arrangements or altering existing arrangements with third parties should speak to and consult with the DPO for more information and guidance.

International Data Transfers

50. There are restrictions on (onward) transfers of Personal Data to international organisations outside of the UK. Staff may only transfer Personal Data outside the UK (including to international organisations outside the UK) if there are sufficient and adequate protections in place. Before making any transfers, Staff should speak to, and seek written authorisation from, the DPO.

51. For more information, see the Employer's Data Protection and Security Policy available from the DPO. If you have any questions or concerns please contact the DPO or Legal Department.

Training

52. The Employer will provide training on the concepts and measures contained in this Policy to all Staff as part of the induction process and at regular intervals thereafter or whenever there is a substantial change in the law or our policies and procedures.

53. Training is provided through seminars or workshops. The completion of such training is compulsory. The Employer will continually monitor training needs but if you feel that you need further training on any aspect of the relevant law or this Policy, please contact the DPO.

Reporting Data Breaches

54. All Staff are under an obligation to report actual or potential data protection compliance breaches to enable the Employer to:

- a) investigate the breach and take any necessary remedial actions;
- b) maintain a register of compliance breaches; and
- c) make any applicable notifications (e.g. to the Information Commissioner's Office).

55. For more information on the Employer's reporting procedure, contact the DPO.

Consequences of Non-Compliance

56. The Employer takes compliance with this Policy very seriously and failure to comply with this Policy puts Staff and the Employer alike at significant risk.

57. Due to the importance of this Policy, failure to comply with any of its procedures and requirements may result in disciplinary action and dismissal.

58. If you have any questions or concerns about anything in this Policy, please contact the DPO at reggie.trevvett@cladsafety.co.uk.

Signed: 

Designation: Managing Director

Date: 28th March 2025

Approved By: N Trevvett

Version: 2

Issue Date: 28th March 2025

Review Date: 28th March 2026



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: 28th March 2025

Approved By: N Trevvett **Version:**

1.3

Issue Date: 28th March 2025

Review Date: 28th March 2026

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 several industries including Utilities, Rail and 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 operate ethically.
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 concerning staff recruitment and retention. Poor labour standards can also lead to a loss of trust and confidence with suppliers and 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 set out below in our code of conduct:

ETHICAL CODE OF CONDUCT

The purpose of our Code of Conduct is to outline our expectations for our suppliers and how we expect to work together to meet these, it is our responsibility to make sure that the human rights of every worker in our supply chain are respected and protected.

We believe that the application of this Code of Conduct enables real and practical steps to be taken towards improving social conditions in our supply chains. Where differences or conflicts arise, and the provisions of law and the code address the same subject, suppliers must apply the provision which affords greater protection to workers.

SUBCONTRACTING

CLAD Safety is committed to being part of a socially and environmentally responsible supply chain; all production of CLAD Safety goods must be in pre-approved factories and any use of subcontractors must be highlighted before production with written consent given by CLAD Safety ahead of order raising.

The below code sets the minimum standards required for all our product suppliers and their factories concerning workers safety and human rights, employment and working conditions. The provisions mirror the Ethical Trading Initiative (ETI) Base Code. The ETI Base Code is a private code agreed amongst ETI business, NGO and Trade Union members. It draws on the conventions of the International Labour Organisation. It is an easy and accessible standard against which CLAD Safety can assess progress on labour rights through our supply chains.

Our code consists of 9 key areas:

1. Employment is freely chosen No forced labour or modern slavery
2. Freedom of Association and the right to Collective Bargaining
3. Safe and Healthy working conditions
4. Child labour shall not be used
5. Fair wages and benefits
6. Working hours are lawful
7. No Discrimination is practiced
8. Regular Employment
9. Respectful treatment of workers

This Base Code and the principles of implementation which go with it are also available in several other languages from the ETI web site www.ethicaltrade.org

EMPLOYMENT IS FREELY CHOSEN

Forced, bonded, indentured and prison labour, slavery, or trafficking of persons in any form is expressly prohibited.

All work shall be voluntary, and workers shall be free to terminate their employment upon reasonable notice without penalty. Workers shall not be required to pay any fees, expenses, or deposits for their employment. Holding, confiscating, or destroying original worker identification documents, passports, travel papers or other personal documents is prohibited. Workers' freedom of movement.

Inside the place of production or business partner-provided facilities, including worker accommodation, and access to toilets and drinking water should not be restricted.

FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING

Workers without distinction have the right to join or form trade unions of their choosing and to bargain collectively. All suppliers to CLAD Safety shall respect the right of workers to freedom of association and collective bargaining as far as permitted by the law of the country in which they operate. Where the right to freedom of association and collective bargaining is restricted under national law, Business Partners shall facilitate and not hinder the development of parallel means for collective bargaining and organization.

WORKING CONDITIONS ARE SAFE AND HYGIENIC

All suppliers to CLAD Safety shall provide a safe and hygienic working environment in safe and secure buildings, following all relevant legislation, regulations, and directives in the country/countries in which they operate. Workers shall receive regular and recorded health and safety training to prevent accidents and injury.

This includes access to clean drinking water, clean toilets, and facilities for food storage as well as protection from fire (emergency exits, first aid equipment), accidents and toxic substances. These standards shall also apply to residential facilities for employees. Information must be available in the primary language of employees and in written form.

The company observing the code shall assign responsibility for health and safety to a senior management representative.

CHILD LABOUR SHALL NOT BE USED

There must be no child workers in any facilities supplying products to CLAD Safety.

Proof of age must be reviewed prior to employment and relevant documentation maintained. Suppliers to CLAD Safety shall install and implement a child repatriation policy, which covers the costs of any child found to be performing work in their facilities to be able to return home and attend school until they reach the legal adult age.

Young persons must not work overtime, be employed in hazardous conditions or work at night. Suppliers can only employ young workers if the working conditions do not interfere with compulsory education laws.

The following are the definitions to be used for the above:

'Child': Any person less than 15 years of age unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age shall apply.

'Young Person': Any worker over the age of a Child as defined above and under the age of 18.

'Child Labour': Any work by a Child or Young Person younger than the age(s) specified in the above definitions, which does not comply with the provisions of the relevant ILO (International Labour) Standards, and any work that is likely to be hazardous or to interfere with the Child's or Young Person's education, or to be harmful to the Child's or Young Person's health or physical, mental, spiritual, moral or social development.

LIVING WAGES ARE PAID

Wages and benefits paid for a standard working week meet, at a minimum, national legal standards, or industry benchmark standards, whichever is higher in any event wages should always be enough to meet basic needs and to provide some discretionary income.

All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time they are paid.

Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned.

WORKING HOURS ARE LAWFUL

Working hours must comply with national laws or the benchmark industry standards, whichever offers greater protection. Normal working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week. Working hours in any seven-day period shall not exceed 60 hours unless there are exceptional circumstances.

In such cases the following conditions must be met:

- This is permitted by national law.
- This is permitted by a collective agreement freely negotiated with a worker' organisation representing a significant portion of the workforce.
- Appropriate safeguards are taken to protect Workers' health and safety; and

- The Employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents, or emergencies.
- Over time must be used responsibly, considering the extent, frequency and hours worked by individual workers and the workforce as a whole.
- One day off shall be guaranteed for every seven days OR where allowed by national law, two days off in every 14-day period.

All overtime working shall be voluntary, should not be demanded on a regular basis, should not exceed 12 hours per week and be compensated at a premium rate. Employees must be compensated for overtime at the rate legally required in the country of manufacture or, in those countries where such laws do not exist, at a rate exceeding the regular hourly compensation rate.

NO DISCRIMINATION IS PRACTISED

All employees shall be treated equally, CLAD Safety recognise and respect cultural differences. Decisions about hiring, remuneration, benefits, work assignments, discipline and termination must be based on the ability to perform a job and not on personal characteristics or beliefs. There is no discrimination in hiring, compensation, access to training, promotion, termination, or retirement based on race, caste, national origin, religion, ages, disability, gender, marital status, sexual orientation, union membership or political affiliation.

REGULAR EMPLOYMENT IS PROVIDED

Wherever reasonably practicable, all workers should enjoy security and stability of employment and regularity of income. Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided.

NO HARSH OR INHUMANE TREATMENT IS ALLOWED

Employees must be treated with respect, dignity and be employed in a workplace free of harassment, abuse, and degrading treatment. No employee will be subject to physical, sexual, mental or any other form of abuse or harassment or corporal punishment.

MONITORING

New First Tier Production Sites

The implementation of compliance to the above Code is measured through our auditing requirements, we require our suppliers to ensure any factories we use are audit annually through CLAD Safety approved 3rd Parties these are SEDEX, BSCI and WRAP.

Suppliers must ensure they are transparent during the audit process and provide full and accurate records.

Full audits must be shared with CLAD Safety, follow up only/ corrective action plan reports alone will not be accepted.

If a site does not have an ethical assessment that meets CLAD Safety minimum assessment requirements, they must arrange a new assessment at Supplier/Factory's cost. This may impact any new supplier sign off for order placement.

Assessment Methodology

SMETA ethical auditing protocol is our preferred monitoring standard.

Assessments must be either unannounced or semi announced (with a minimum 3-week window)

We do not accept announced audits.

Sedex

CLAD Safety are members of Sedex, we use this tool to assist in our management of ethical audits and risk management across our supply chain. All suppliers we work with will need to ensure that their production facilities are registered on Sedex system, linked to CLAD Safety, with complete SAQ and audits available.

Engagement and Continuous Improvement

CLAD Safety will continue to work with Suppliers who strive for continuous improvement. Where an existing supplier is not meeting the minimum requirements of the ETI base code we will support the supplier in developing an action plan with sensible timescales for improvements.

Collaboration is an essential tool to drive improvements within the supply chain. We will always look to work together with all interested to support the factory management team to ensure improvements are sustainable.

Each supplier should have at least one member of staff who has responsibility for managing ethical trade requirements.

CLAD Safety expects its suppliers to take responsibility for implementing these areas throughout their own supply chain and business operations. All local staff working on CLAD Safety production should understand ETI base code requirements on working conditions, UK Modern Slavery Act requirements and local (country and regional) laws pertaining to employee rights and employers' obligations.

Our priority is always to support factories in resolving issues, but we will not continue to work with them indefinitely if there is no willingness on their part to address any issues and improve.

Signed: *N Trevvett*

Designation: Managing Director

Date: 28th March 2025

Approved By: N Trevvett

Version: 2

Issue Date: 28th March 2025

Review Date: 28th March 2026

Workplace: Clad Safety Limited

Document: Social Value Policy

Reference: E17

Our commitment to the principles of Corporate Social Responsibility goes beyond just a good business sense. It's a reflection of our core values and the belief that we can make a positive impact on the world. Social value is a concept that has been at the heart of our work since CLAD Safety was founded over 35 years ago, we understand that our business and activities have direct and indirect impacts on our stakeholders, the environment, and local communities, and we strive to ensure these impacts are recognised, understood by the full team and as far as reasonably practicable leave a positive lasting impression.

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.

Responsible Business

We are committed to the practice of responsible corporate behaviour and through our business practices, we seek to protect and promote the human rights and basic freedoms of all its employees. Further, CLAD Safety is committed to protecting the rights of all of those whose work contributes to the success of the Company, including those employees and our supply chain.

We maintain clear accountability for delivering this policy and continuously improving our standards of efficiency and effectiveness. To support this we will:

- Build and maintain the highest standards amongst our suppliers
- Operate in a way that safeguards against unfair business practices
- We believe that a responsible approach to developing relationships between companies and the communities they serve, global or local, is a vital part of delivering business success
- All the laws that regulate and apply will be complied with
- All groups and individuals with whom we have a business relationship will be treated in a fair, open, and respectful manner
- Allow our customers to give feedback on our performance and ensure that all customer comments are analysed, responded to, and where appropriate, acted upon
- An Action Plan will be developed to ensure continuous improvement is achieved

Equality, Diversity and Inclusion

We aim to eliminate discrimination on any grounds and promote equality of opportunity in the supply chain. No worker should be discriminated against based on age, gender, race,

sexual orientation, religion or beliefs, gender reassignment, marital status or pregnancy. All workers should be treated equally.

Workers with the same experience and qualifications should receive equal pay for equal work.

CLAD Safety does not accept any corporal punishment, harassment in any form, or bullying in any form. Further information can be found in our Equality and Diversity Policy.

CLAD Safety is opposed to the use of slavery in all forms; cruel, inhuman, or degrading punishments; and any attempt to control or reduce freedom of thought, conscience, and religion.

The Company will ensure that all of its employees, agents and contractors are entitled to their human rights as set out in the Universal Declaration of Human Rights and the Human Rights Act 1998.

CLAD Safety will not enter into any business arrangement with any person, company or organisation which fails to uphold the human rights of its workers or who breaches the human rights of those affected by the organisation's activities.

Employment and Skills

All employees are provided with the opportunities to upskill, learn, and develop within the business, this could be through role related mandatory training and personal development.

- Providing our employees with new skills for the future by partnering with an external learning provider
- 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

Supply Chain Management

CLAD Safety are members of Sedex and have been since 2016, we are committed to sourcing responsibly and having an ethical and sustainable supply chain.

In 2023 we partnered with Verisio, a supply chain management platform that is now supporting us go beyond an audit, to map our supply chain, increase transparency, assess and manage risk.

Living Wage Employer

CLAD Safety are committed to our status as a Living Wage employer.

Community Engagement Programme

We recognise that we play an important role in our local communities, and we aim to make the communities in which we operate better places.

- 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.
- Actively donate to local charities / non-profit organisations within our community
- Supporting and encouraging our staff to live healthier lives.

Environment

We are fully committed to managing our impact on the environment in a responsible manner. We aim to continually improve our performance, prevent pollution wherever possible and comply with all applicable laws, regulations, and industry standards.

To ensure we are doing this effectively we became members of Planet Mark in 2024 who will be supporting us on part of this journey. Key focuses for us are:

- Manage our processes so as to avoid/minimize waste.
- Work to minimise our use of energy
- Ensure all employees have appropriate training and an awareness of this policy so that it is implemented effectively
- Avoid the use of toxic materials and chemicals
- Assess actual and potential environmental effects of all activities in all parts of the business
- Adopt best processes and select the best practicable environmental option
- Review, monitor, and audit compliance to standards and guidelines including assessing the impact on business activities
- Strive for continuous improvement

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: 28th March 2025

Approved By: N Trevvett

Version: 2

Issue Date: 28th March 2025

Review Date: 28th March 2026

Workplace: Clad Safety Limited

Document: Quality Policy

Reference: E18

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: 28th March 2025

Approved By: N Trevvett

Version: 2

Issue Date: 28th March 2025

Review Date: 28th March 2026

Workplace: Clad Safety Limited

Document: Environmental Policy

Reference: E19

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: 28th March 2025

Approved By: N Trevvett

Version: 2

Issue Date: 28th March 2025

Review Date: 28th March 2026

Workplace: Clad Safety Limited

Document: Health and Safety Policy

Reference: E20

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: 28th March 2025

Approved By: N Trevvett

Version: 2

Issue Date: 28th March 2025

Review Date: 28th March 2026

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Workplace: Clad Safety Limited

Document: Ethical Supply Chain Policy

Reference: E21

Our policy and related guidance are designed to ensure we meet our compliance obligations while also supporting our stakeholders in meeting theirs.

At the core of our mission is the goal to enhance the working lives and productivity of our customers by providing innovative and protective clothing solutions. We believe in delivering high-quality, compliant products that are ethically sourced through a responsible and sustainable supply chain.

We are committed to using our network to improve compliance, quality, and ethical practices in the areas where we operate.

What is Ethical Trade?

Ethical trade is about having confidence that the products and services we buy have not been made at the expense of workers in global supply chains enjoying their rights. It encompasses a breadth of international labour rights such as working hours, health and safety, freedom of association, and wages. Ethical trade involves companies taking a series of recognised steps to identify problems and improve working conditions, with a focus on continuous improvement over time.

- Ethical Trade Initiative

Our Policy

We take great pride in being a company that values the well-being and rights of all our employees, supply chain partners, and the communities we operate in. We are committed to preventing any form of modern-day slavery or human trafficking and are dedicated to creating a safe and healthy supply chain. We firmly believe in promoting the rights of our workers to freedom of association and collective bargaining, and we strive to create a diverse and inclusive workforce. Our values align with the principles outlined in the UN Guiding Principles on Business and Human Rights, and we are proud to support our Diversity, Equality & Inclusion Policy, which further underscores our commitment to creating a fair and just workplace for all.

Although we are not currently members of the Ethical Trading Initiative (ETI), we have committed ourselves to adopting the principles of its base code into our own standards of practice. Our code of conduct has been aligned with the ETI base code, and we remain steadfast in our efforts to implement these principles into our everyday operations.

Application of this Policy

All CLAD colleagues must read, apply, and comply with this Policy and guidance to uphold our commitment to promoting the well-being, dignity, and human rights of our employees, supply chain partners, and communities. Together, we can create a safe, fair, and inclusive work environment where everyone feels valued and respected.



Signed: *N. Trevvett*

Designation: Managing Director

Date: 28th March 2025

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Workplace: Clad Safety Limited

Document: Responsible Sourcing Policy

Reference: E23

ANIMAL WELFARE

CLAD Safety expects all Suppliers to uphold this policy as a minimum or to have a similar policy of their own whichever affords the greater social, environmental, or animal welfare protection. Suppliers are responsible for communicating this policy, ensuring compliance, and carrying out due diligence in any factories or subcontractors making goods for CLAD.

CLAD firmly believes it is not acceptable for animals to suffer in the name of fashion or cosmetics. No animals should be slaughtered specifically to produce products made for CLAD Safety any animal materials used must be by-products of the meat industry.

Animal products and synthetic materials made to look like animal products must be clearly labelled as faux on the product description and care label to avoid confusion.

The Supplier must as a minimum requirement comply with national laws and industry standards related to Animal Welfare. Suppliers must respect animal welfare and work progressively towards adopting healthy and humane practices towards animals based under industry best practice standards, based on the Five Freedoms.

1. freedom from hunger and thirst.
2. freedom from discomfort.
3. freedom from pain, injury, and disease.
4. freedom to express normal behaviour.
5. freedom from fear and distress.

Certification standards that adopt the Five Freedom principles while tracing to farm or source enable validation of the above.

BANNED MATERIALS

The following materials and processes do not comply with our business principles for animal welfare and therefore must not be used in CLAD Safety products.

ENDANGERED SPECIES

Materials derived from vulnerable or endangered species appearing on either the International Union for the Conservation of Nature (IUCN) or the Convention of International Trade in Endangered Species (CITES) lists must not be used in products sold to CLAD Safety.

Bone, Horn, Shell, and Teeth, including pearls and coral must not be used in CLAD Safety products.

FUR

CLAD Safety is a fur free company. All real fur or pelts are banned. This includes both farmed fur and fur which may be a by-product of the meat industry, Mongolian Lambs Fur, Karakul, or any other skin materials that are the products of unnatural abortions.

LEATHER & SKIN

CLAD Safety do not accept the use of any skins from animals that have been boiled or skinned alive nor will we use Karakul, Slink or other leathers that are from unborn animals.

CLAD Safety prefer to use leather and skins sourced from tanneries which have undergone third-party independent audit assessing their environmental performance, such as Leather Working Group or ISO14001

All leather, hair on hide or hair on skin used in our products is required to be sourced as the by-product of meat production.

FEATHERS & DOWN

We condemn sourcing feather or down from birds that have been plucked whilst alive.

CLAD Safety encourage suppliers to use synthetic alternatives to feathers and down in their products. Only products from suppliers that can provide Responsible Down Standard (RDS) and Traceable Down Standard (TDS) certified down, can be used in our products.

ANGORA

Angora and other rabbit hair must not be used in the CLAD Safety products.

MOHAIR

Mohair wool must not be used in CLAD Safety Products

WOOL

We encourage our mills to source Merino wool from farmers who do not practice mulesing.

CLAD Safety require that all sheep and lamb wool must be sourced from producers with good animal husbandry, as defined in the Five Freedoms.

CLAD Safety encourages all suppliers to source wool from certified farms where standards are in place (for example the Responsible Wool Standard.)

CASHMERE

Cashmere fibres must be obtained from animals where good animal welfare practices are used, as defined by the Freedoms stated above. These must only be procured from producers with

ecologically sustainable farming practices with a focus on avoiding land degradation. CLAD Safety place a preference for cashmere fibres sourced through an approved responsible Standard such as The Good Cashmere standard.

COTTON

CLAD Safety prohibits the use of cotton sourced from Uzbekistan, Turkmenistan, and the Xinjiang Uygur Autonomous Region (XUAR) in China in all products. This is as a result of documented human rights concerns, including the occurrence of child labour and forced labour in the harvesting of cotton.

CLAD Safety have identified the following as high risk and does not source in these regions. Can you confirm you do not source in the following areas?

Afghanistan, Belarus, Central African Republic, DR Congo, Crimea, Cuba, Iran, Iraq, Libya, North Korea, Russia, Somalia, Sudan, Republic of South Sudan, Syria, Venezuela, Yemen, Zimbabwe, Occupied Territories and Golan Heights, Uzbekistan, Turkmenistan, and Xinjiang Uygur Autonomous Region (XUAR) in China

OTHER RAW MATERIALS

WOOD AND PAPER BASED PRODUCT

CLAD Safety are working to ensure no ancient or endangered forests are used in any of our wood-based products, including in packaging and trims. All CLAD Safety wood-based products should originate from FSC or PEFC certified sources. For packaging Suppliers should give preference to paper-based packaging with high-recycled content, specifically post-consumer waste content.

PLASTIC BASED PACKAGING

CLAD Safety are working towards minimising the environmental impact of our products by prioritising fibres which have a reduced impact on the environment.

Where there is no suitable alternative to using plastic for packaging suppliers will firstly ensure that the amount used is kept to a minimum and not considered to be excessive.

All plastic packaging that is used on CLAD products must be composed of a minimum of 30% recycled plastic from accredited GSR (Global Recycled Standard) and where possible RCS (Recycled Claim Standard)

TRANSPARENCY AND MONITORING

Suppliers are expected to implement and maintain the necessary systems to ensure compliance to this Policy, along with transparency to CLAD Safety on fibre compositions of all materials and country of origin.

Suppliers are expected to keep up-to-date and accurate records of how materials have been sourced and all accreditations, where known across their supply chain as well as carrying out their own due

diligence to verify that sourcing information is correct. Where requested, Suppliers should provide information on the traceability of the materials and all relevant certifications. All materials which can be certified according to relevant responsible sourcing standard need to be accompanied with full chain of custody certification. CLAD Safety will not accept any falsified documentation or misleading claims.

If the Supplier becomes aware of a breach of the Code, in any part of the supply chain, the Supplier must immediately notify CLAD Safety sourcing team at purchasing@cladsafety.co.uk and disclose all relevant information to allow the team to accurately assess the problem. The Supplier will cooperate with CLAD's sourcing team and implement all measures necessary to resolve the issue at their own expense.

CLAD Safety are committed to continually developing and improving the relationships with Suppliers. If you are in doubt about any of the standards in the code, please do not hesitate to contact our sourcing team at purchasing@cladsafety.co.uk.

Failure to comply with the terms of this Policy will be considered a material breach of this Policy and without limiting or affecting any other right or remedy available to it, CLAD Safety may terminate any Supplier agreement at any time if Supplier is in breach of this Code -

1. The five freedoms were developed by the UK's Farm Animal Welfare Committee and have been adopted as the foundation of higher animal welfare standards globally. These higher welfare standards are referenced throughout this policy under the term "good animal husbandry".
<https://www.animalhumanesociety.org/health/five-freedoms-animals>
2. Mulesing involves cutting away flesh from a sheep's rump, often without anaesthetic, in an attempt to produce a smooth wool-free area that is less attractive to flies.
3. Textile Exchange's Responsible Wool Standard promotes good animal welfare, traceability, and responsible land management practices among wool producers
<https://textileexchange.org/standards/responsible-wool/>

Signed: 

Designation: Managing Director

Date: 28th March 2025

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Workplace: Clad Safety Limited

Document: Chemical Compliance Policy

Reference: E24

CLAD Safety's Chemical Compliance Policy is the minimum standard that all factories, suppliers, licensees, partners, and any associated subcontractors (referred to in this Policy as "Suppliers") must meet. CLAD Safety expect Suppliers to continually adopt this Policy and ensure that the standards set out in this Policy are implemented.

RESTRICTED SUBSTANCES LIST

Eliminate Harmful Chemicals

As CLAD Safety continues to build its sustainability commitment, we aim to reduce environmental impact and eliminate the use of harmful chemicals to protect worker/consumer health and the environment.

Compliance to Global Legislations

CLAD Safety align their Restricted Substance List (RSL) with REACH ANNEX XVII and Proposition 65 to ensure the legislative and regulatory requirements of global trading territories CLAD Safety sells within are met, these outline the acceptable limits of potentially toxic or harmful substances which can be present in finished products. CLAD Safety expects all our suppliers (including brands) to supply products that comply with these applicable global legislative and regulatory requirements and take responsibility for keeping up to date with any legislative changes. Suppliers should be risk-assessing all materials and product for compliance as part of product development process.

The full list of Restricted substances can be found in the links below:

REACH <https://echa.europa.eu/regulations/reach/understanding-reach>

California Prop 65 <https://oehha.ca.gov/proposition-65>

The CLAD Safety RSL

- Applies to all fabrics, components, products, and packaging.
- Details the global requirement for restricted substances and respective limits in finished goods.
- CLAD Safety accepts alternative to testing demonstration of compliance; Oekotex, Bluesign.

If you become aware that ANY Product(s) may or do contain any restricted substance(s), please notify CLAD Safety immediately at purchasing@cladsafety.co.uk

You will be required to provide evidence that the levels used are within the limits imposed within Annex XVII as well as an explanation of why you cannot find a suitable substitute for such substances. If you do use any substances of concern, then we prefer to work with you to either eliminate the use of such substances or to find safer alternatives for use in CLAD Safety products.

CLAD Safety Actions on Chemical Failures

CLAD Safety will not accept products, which fail to comply with our RSL and reserves the right to:

- a) Reject non-compliant products and require a replacement with compliant products.
- b) Require re-working of the products to comply with the CLAD Safety RSL.
- c) Test and/or conduct a product recall.
- d) Cancel any undelivered order/s.
- e) Discount / price reduction of delivered orders.
- f) Apply service credits,
- g) Apply monetary deductions including but not limited to covering the cost of paying fines to an enforcement authority.
- h) Account for any lost profits incurred by CLAD Safety including but not limited to as a result of a Product recall and making goodwill payments.
- i) Destroy or safely dispose of products (at supplier's cost).
- j) Reject stock (supplier to arrange and pay for the cost of storage and collection).
- k) Recover associated costs from suppliers.

Signed: 

Designation: Managing Director

Date: 28th March 2025

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Workplace: Clad Safety Limited

Document: Whistleblowing Policy

Reference: E25

At CLAD Safety we are committed to conducting our business with honesty and integrity in accordance with the highest standards. However, like any organisation, we are aware that there is a risk of wrongdoing normal practice occurring, from time to time.

Encouraging a culture of openness is important to us and we encourage our employees and those with whom we do business to raise any concerns they may have in relation to any wrongdoing or malpractice. This policy establishes the means to notify us about any such concerns.

If there is any practice or behaviour that you reasonably consider constitutes unlawful activity that we should know about, please use the procedure set out in this policy document. The reporting of genuine concerns will not adversely affect your employment or business relationship with CLAD Safety.

What is whistleblowing?

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities.

This policy will apply in cases where you genuinely and in good faith believe that one of the following sets of circumstances is occurring, has occurred or may occur within CLAD Safety and that it is in the public interest for such circumstances to be disclosed:

- financial or accounting fraud, corruption, bribery, or other financial impropriety;
- significant deficiencies or material weaknesses in the company's system of internal controls or any other significant weakness related to auditing or accounting matters which may have a material effect on the company's financial statements;
- the improper use of confidential or commercially sensitive information;
- the improper use of insider information for dealing in the shares of any company whose shares are listed on a recognised stock exchange;
- the failure to disclose information or the destruction of documents which should be disclosed to others in the company or any applicable regulatory body;
- a criminal offence or a failure to comply with legal obligations;
- the health and safety of any individual has been, is being or is likely to be endangered;
- a failure to comply with CLAD Safety's policies, procedures, or internal controls; or
- the deliberate concealment of information relating to any of the above.

Reporting Procedures

Any person concerned about wrongdoing or malpractice involving or relating to CLAD or its dealings with customers, suppliers or business partners should follow the procedure set out below.

Anyone raising a genuine concern using the process set out in this policy document will not under any circumstances suffer any form of detriment or disadvantage as a result of having raised their concern.

All concerns properly raised under this policy will be treated seriously and in confidence. Unless required to do so as a matter of law, CLAD Safety will not disclose any information, other than in accordance with the terms of this policy, without the prior consent of the person who raised the concern.

Who does this policy apply to?

This policy is designed to provide guidance to directors, employees, suppliers, and contractors, who may, from time to time, feel that they need to raise certain issues relating to CLAD with someone in confidence. Employees should be aware that this policy is separate and distinct from the Grievance Procedure. If you have a complaint about your own personal circumstances you should use the grievance procedure which can be found in our Employee handbooks.

How to raise a concern

The Whistleblowing process should be used only to raise concerns about malpractice or wrongdoing within CLAD Safety. Clad Safety employees:

Stage 1 -

Tell your immediate supervisor or line manager. You should raise any concern with your immediate supervisor/line manager in the first instance. If your supervisor/line manager is not contactable, your concern relates to him/her, or it is inappropriate to involve him/her for some other reason, you should go directly to stage 2 in the escalation process.

Stage 2 – Either email or contact any of the Whistleblowing Officers below via the e-mail address whistleblowing@cladsafety.co.uk all matters will be dealt with in confidence, additional contact details;

Commercial Director Reggie Trevvett reggie.trevvett@cladsafety.co.uk Sourcing & Sustainability Manager Gemma Goodacre gemma.goodacre@cladsafety.co.uk

All the above can also be contacted at;

CLAD Safety Limited, Bridge House, Wetherby Rd, Knaresborough HG5 8LJ

All correspondence should be marked 'Strictly private and confidential - to be read by addressee only'.

Policies - Template WHISTLEBLOWING POLICY

E: sales@cladsafety.co.uk W: cladsafety.co.uk T: 0800 161 3661

Persons other than CLAD Safety Employees

Please follow the process from stage 2 as described above for CLAD Safety employees.

Dealing with a concern

If a concern is raised at any stage of the above, the following commitments will be made;

The concern will be acknowledged within 5 working days by the recipient and a meeting arranged with the employee/person as soon as practicably possible but no longer than 10 working days after the concern has been raised. You are entitled to bring a colleague to this meeting, but that colleague must respect the confidentiality of the process.

A full investigation will be carried out; actions and feedback reported within 3 months of the initial concern.

Raising Concerns Anonymously

You may raise your concern anonymously and can do so by writing to the above address to one of the listed Whistleblower Officers, however please make sure you detail clearly what your concern is so that the matter can be investigated by the most appropriate person.

While we do hope you feel you are able to talk to someone within the company, we do recognise in some circumstances you may wish to seek further advice from outside the organisation.

Protect is a UK charity who aim to stop harm by encouraging safe whistleblowing. They offer a free, confidential advice line which can be reached through the link below or by the phone number provided:

<https://protect-advice.org.uk/advice-line/>

Tel; 020 3117 2520

Signed: 

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