













**Health and Safety
Policy**

Part 1

Issue 12 – August 2023

Policy Review Record

Date	Issue	Comment / Amendment	Reviewed By	Signature
July 17	01-04	Doc History Archived	C. Turner	
August 18	05	Policy Review	N. Kwarteng-Ababio	
November 18	06	Removal of Quality Statement as this is now contained within BS EN 1090 and ISO 9001 Documentation Manual; added coordinators to Employee Safety Responsibilities	C. Turner	
August 19	07	Inclusion of quality policy now contained within BS EN 1090 and ISO 9001 Documentation Manual and business continuity; amended CSR, CFSI, MSHT statements	N. Kwarteng-Ababio	
March 20	08	Review of quality policy. Inclusion of drugs and alcohol policy. Inclusion of infectious diseases in the workplace policy.	N. Kwarteng-Ababio	
August 20	09	Policy Review. Inclusion of anti-slavery and human trafficking, equality and diversity policies	N. Kwarteng-Ababio	
August 21	10	Inclusion of COVID-19 statement within health and safety policy.	N. Kwarteng-Ababio	
August 22	11	Annual Review and amendment to include Welding Fume Control within arrangements.	N. Kwarteng-Ababio	
December 22	12	Inclusion of Energy Saving and Energy Awareness Policy	N. Kwarteng-Ababio	
August 23	13	GDPR/Info Security, Anti-Fraud Policy and Right to Work Policy included	N. Kwarteng-Ababio	

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Appendices

Employee Safety Responsibilities

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Employee Safety Responsibilities Matrix

Responsibilities for Product Safety

Foreword

Delphini Ltd recognises and accepts the responsibilities within its undertaking to provide a safe environment for all of its employees, contractors, visitors and members of the public. Every aspect of Delphini Ltd must have a responsible and thorough approach to safety, with safety being integrated into all aspects of its work.

Delphini Ltd, through its management team, strives to provide a safe and pleasant environment for staff, visitors, contractors and customers. Throughout all projects to improve and develop Delphini Ltd, continuous improvement in safety performance will remain a priority. Delphini Ltd will work and co-operate with all parties to develop and maintain a positive safety culture.

We encourage all to safeguard their own and others safety by evaluating the risks encountered and to adopt sensible precautions to remove or minimise risk. With regard to Delphini Ltd employees, as your employer, Delphini Ltd must carry out assessments of the risks that you may face. I encourage you to inform your manager of any safety concerns that you may have.



Dave Cormack
Managing Director
August 2023

1.0 The Philosophy of the Board

The Board of Delphini Ltd is responsible, within the terms of the appropriate legislation, for the safety of its employees, visitors and customers. It accepts that the avoidance of accidents involving injury and the consequential human suffering is a common interest to all. Great importance is attached to safety with the commitment to play an influential role in providing a safe working environment.

Safety should be an integrated function of management and each manager/employee should be accountable for the safety performance of his/her department/work area. The active co-operation and understanding of all staff are a vital aspect of the organisation's safety element. The Board believes that all accidents are preventable and that their occurrence demands investigation and timely action. In particular the Board seeks to comply with the spirit as well as the letter of current safety legislation, approved codes of practice and authoritative guidance literature.

Delphini Ltd Directors will also actively ensure that it discharges its duties with regard to health and safety management by:

- Accepting formally and publicly their collective role in providing safety leadership within the organisation.
- Each member of the Board accepts their individual role in providing safety leadership for their organisation.
- All decisions will reflect its safety intentions, as articulated in the safety policy statement of intent.
- The Board recognises its role in engaging the active participation of employees in improving safety.
- The Board will ensure that it is kept informed of, alert to, relevant safety risk management issues.
- The Board agree that safety is a key area of management demanding the control and application of modern management techniques.

2.0 General Statement of Intent

2.1 Health, Safety and Welfare

Delphini Ltd recognises that high standards of health, safety and welfare are an integral element of a successful and efficient business. The management of this key performance indicator is therefore central to our strategy for the wellbeing of both the Company and its employees.

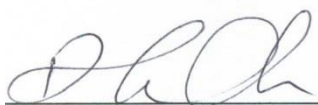
We acknowledge Health, Safety and Welfare are a management responsibility and are of equal importance to all other parts of the business. It is to be actively pursued through the continuing development of employee competence and the provision of expert advice to achieve progressive improvements in Health, Safety and Welfare performance. As a company we are committed to ensuring compliance with the requirements of The Health and Safety at Work Act etc 1974 and other such relevant Health and Safety legislation that may from time to time be introduced.

We will therefore ensure, so far as is reasonably practicable that: -

- All relevant statutory requirements are observed and are treated as the minimum standards to be applied to any work activities.
- Health, safety and welfare considerations are included in our business planning and decision making. Thus, ensuring a safe and healthy working environment along with safe methods of work and conditions provided, adopted and managed.
- Adequate information, instruction, training and supervision is to be provided so that through the use of formal risk assessment and the communication of the control measures to be adopted, to eliminate or reduce risk, individuals are made aware of the potential hazards they may face as a consequence of their work and work of others.
- Plant, equipment and materials provided for work that is to be undertaken will be fit for purpose and adequately maintained so as to be free from unnecessary risk.
- Employees and Sub-Contractors are actively encouraged to participate in health and safety, raise safety concerns and submit ideas and suggestions for improving standards, thereby facilitating co-operation between individuals, groups and the management team.
- The immediate and underlying causes of work-related injuries and near misses will be identified and the necessary preventive action implemented to prevent a re-occurrence. This will include, as a last option, the provision and use of the correct personal protective equipment to ensure employees health and safety.
- Adapt our operating procedures for COVID-19 in line with government and industry best-practices
- Health and safety will never be compromised for other company objectives.

To assist in the promotion of a positive Health, Safety and Welfare culture the Company will establish objectives; develop, implement and maintain management controls; instigate sound communication of information on safety and health; monitor; audit and review matters of Health and Safety & Welfare. In pursuance to that Health, Safety and Welfare will therefore be regularly reviewed at a senior level.

This Policy will be reviewed and developed periodically to ensure it remains effective and any necessary amendments will be communicated to all employees.



Dave Cormack
Managing Director
August 2023

2.2 Worksafe Policy

Delphini Ltd actively encourages any employee or sub-contractor to decline to carry out any working activity, if they feel it is not safe to do so.

Delphini Ltd shall ensure that no employee or sub-contractor shall be penalised for highlighting safety concerns or refusing to work on the grounds of health and safety.

Joint consultation will be held between management and employees including any appointed safety representatives, to resolve any problems which may arise.

Information will be provided to employees on subjects relevant to any consultation that they will be involved with such as the planning of health and safety training; and risk and hazards involved during the course of their work.

To resolve problems both parties, if necessary, will jointly seek expert impartial advice.

Employees who feel that problems are not being satisfactorily resolved by line management should highlight such concerns to a through the normal lines of communications however this does not affect employees' rights to contact the Health and Safety Executive independently.

Consultation will be undertaken if a decision is to be made involving work equipment, processes or organisation that could affect the health and safety of employees. Information will be provided, and a chance will be given to the employees to express their views on the subject. These will all be taken into account before a decision is reached.

If any Delphini Ltd employee or sub-contractor has any concern with regard their health and safety, or that of others, they should inform their manager/supervisor immediately (or as soon as it is safe to do, dependent upon the circumstances) and if he or she is not available, then they must report to an alternative person in authority. The process for dealing with all health and safety concerns is illustrated in the H&S Concerns Flow Chart (HS37).



Dave Cormack
Managing Director
August 2023

2.3 Environmental Policy

Delphini Limited is committed to ensuring, insofar as is reasonably practicable, that its own operations and activities over which it exerts an influence take account of and employ techniques and materials designed not to harm the environment.

In carrying out its working operations Delphini recognise the importance of maintaining and protecting the environment. The company recognises that effective management of our environment makes good business sense and will be a fundamental and integral part of our business strategy.

To ensure we achieve these standards, procedures will be implemented to include the following:

- Being aware of how our activities impact upon the environment and seek to minimise adverse effects by means of the best available techniques, not entailing excessive cost (BATNEEC) or if required by the client BAT (Best Available Technique). This will be achieved through a policy of continual improvement in equipment, site management, the disposal of wastes and general operation of the business.
- Complying with our legal responsibilities and playing our part in influencing future legislation if / when the opportunity arises.
- Conserving the use of resources, particularly those which are scarce or non-renewable, including the following:
 - To avoid waste and encourage conservation, re-use and recycling, e.g., chipping, composting and waste disposal management etc.
 - To reduce air, land and water pollution, e.g., use of toxic chemicals, motor exhaust etc.
 - The choice of materials best suited for a particular use shall be decided upon with due consideration as to the sustainability of their sources.
- Being sensitive to the environmental concerns of our neighbours and the communities through which we operate and responding to them.
- Requiring our suppliers and contractors to have a proper regard for our Environmental Policy for the goods and services they provide for us.
- Communicating this policy to our staff, suppliers and customers (and any other interested parties, upon request) and seeking their help to implement it.

This policy will be reviewed on an annual basis.



Dave Cormack
Managing Director
August 2023

2.4 Counterfeit, Fraudulent & Suspect Items

Introduction

Delphini Ltd is a SME and family company founded in 2001. The company was founded by David Cormack with his father-in-law and father. Both remain an integral part of the business today. Martin Hale is the Financial Director and George Cormack is retained, after retirement as a technical consultant. There are currently three generations of the family working at Delphini Ltd.

Delphini Ltd promotes awareness of the proliferation of counterfeit, fraudulent and suspect items (CFSI) and we are committed to preventing such items getting into our facilities, processes and services.

Counterfeit

Items intentionally manufactured or altered to imitate a legitimate product in order to pass themselves off as genuine. Counterfeit product can be deficient materially or inability to reliably function to the specified conditions.

Fraudulent

Fraudulent items are misrepresented with intent to deceive, including items with incorrect identification or false certifications. They may also include items sold by entities that have acquired the legal right to manufacture a specified quantity of an item but produce a larger quantity than authorized and sell the excess as legitimate inventory.

Suspect

An item about which there is an indication by visual inspection, testing, or other preliminary information that it may not conform to accepted standards, specifications and/or technical requirements and there is a suspicion that the item may be counterfeit, fraudulent, or non-conforming.

Additional information or investigation is needed to determine whether the suspect item is acceptable, non-conforming, counterfeit or fraudulent

Item

This can be a product and can also be a service.

What can we do?

Our business is based on the safety of the products and services we supply. We understand the legal requirements of compliance and we are committed in providing quality products that are 100% compliant to all UK & EN Regulations.

Supply Chain

We use approved suppliers only and request an EC Declaration of Conformity, material certificates and original manufacturer's details where possible.

When a specific brand is required, we order direct from the manufacturer or from a known agent.

Delphini Ltd have suitably qualified and experienced staff that will review and verify through inspection, bought in goods before they are sold on or incorporated into a Delphini project or process.

CE Marking

Many of the goods we sell or purchase fall under EC directives and should be CE marked or supplied with an EC Declaration of Conformity.

What is the CE mark?

- Shows the manufacturer has checked that these products meet EU safety, health or environmental requirements
- Is an indicator of a product's compliance with EU legislation
- Allows the free movement of products within the European market

By placing the CE marking on a product, a manufacturer is declaring, on his sole responsibility, conformity with all of the legal requirements to achieve CE marking. The manufacturer is thus ensuring validity for the product to be sold throughout the European Economic Area (EEA). This also applies to products made in third countries which are sold in the EEA and Turkey.

CE marking does not mean that a product was made in the EEA, but states that the product is assessed before being placed on the market.

It means the product satisfies the legislative requirements to be sold there.

It means that the manufacturer has checked that the product complies with all relevant essential requirements, for example health and safety requirements.

If you are a manufacturer, it is your responsibility to:

- Carry out the conformity assessment
- Set up the technical file
- Issued the EC Declaration of Conformity (DoC)
- Place the CE mark on the product

As a distributor we must check the presence of both the CE marking and the necessary supporting EC Declaration of Conformity.

As an importer, importing a product we have to check that the manufacture outside of the EU has undertaken the necessary steps, and check the documentation is available

Trade Associations

As members of the Lifting Equipment Engineers Association (LEEA) and the International Cargo Handling Co-ordination Association (ICHCA) we can gain and share knowledge of CFSI items.

Each association has direct contact with government executive bodies such as HSE, MCA, Trading Standards as well as other associations, companies and manufacturers. Product warnings must be shared with staff via notice boards, toolbox talks and emails.

Communication with Staff

It is essential that staff recognize and understand the risks associated with CFSI. This document must be available in the staff handbook for reference.

General

We must all be vigilant to the risk of using CFSI and question anything that appears doubtful.

Ensure that the process of initially selecting and approving a supplier is robust

Apply robust monitoring of the supply chain by documenting non-conformances to ensure continuing understanding and compliance.

Never assume that you will always get the correct product/service, request certification and complete a thorough inspection.

In the event of suspect or counterfeit products being found Delphini shall initiate the non-conformity process as per our Quality Assurance Manual and the items should be quarantined.

The items should be quarantined and not returned to the supplier to prevent them re-entering the supply chain.



Dave Cormack
Managing Director
August 2023

2.5 Corporate and Social Responsibility Policy

1. Introduction

Delphini Ltd is a SME and family company founded in 2001. The company was founded by David Cormack with his father-in-law and father. Both remain an integral part of the business today. Martin Hale is the Financial Director and George Cormack is retained, after retirement as a technical consultant. There are currently three generations of the family working at Delphini Ltd.

We believe that the way we do business, based on the values, principles and goals of a family company and the pride we instil on getting things right has been instrumental to our growth and success. We are a small company, but we have the ability and resources to service our contracts, provide personal but professional customer service and have a commitment to safety and quality.

Our business is based on the safety of the products and services we supply. We understand the legal requirements of compliance and we are committed in providing quality products that are 100% compliant to all British Standards and UK & EN Regulations and laws.

Our team is qualified and trained and are a massive part of our on-going success. Our staff and engineers are empowered and encouraged to ensure that jobs are finished on time and safely. We encourage open dialogue between engineers and management and foster an atmosphere where our employees can discuss concerns such as customer service, efficiency and safety.

We also believe that it is essential to build long term partnerships with our suppliers, supporting companies with similar principles as our own.

We support charities and sporting teams that have an impact on our community bringing our name and principles to the community as a whole.

2. Our Values

Our business behaviour is governed by our core values, our values are the basis of our thinking and the way we act. They:

- Make it possible to conduct our business and decide quickly and efficiently with the least possible level of bureaucracy
- Determine the way we do business, the way we work together and the way we want to be perceived by our surroundings

Our values are:

Honesty

We are honest by being true to ourselves and approach our surroundings in the same way. We look at our business honestly and ensure that we identify problems so they can be addressed and not hidden.

We respect and work to the laws of the land and understand our position within the community and our responsibility to our shareholders and employees.

Responsibility

We are responsible when acting with respect for the interests of our customers, suppliers, employees, and neighbours. We are always accountable for our actions.

Efficiency

We are efficient by taking the necessary time to plan properly as thorough preparation takes us towards our goals. Once the decision has been taken, we execute fast and communicate accurately.

Pride

We are passionate by believing and taking pride in what we do. We influence our surroundings internally as well as externally by showing that we care about the company, our job, co-workers, and customers.

Professionalism

We are professional in our work and dealings. We will always provide our customers with the best solution taking into consideration regulatory compliance, safety, and service. We will always do what we say and uphold our integrity.

Safety

We will conduct our business to ensure the safety of our employees, customers, and the community as a whole. We will ensure that all regulatory safety and environmental standards are upheld.

The H&S Supervisor / Advisor shall be named as the Social Value Champion (SVC). The responsibilities of the SVC shall include:

- The Values Champions support the rollout and embedding of the company's Values and Behaviours.
- Raising awareness of culture and values across the business, the SVC will provide ideas and feedback on values-related development sessions and communication plans; and reflect the needs and experience of site teams on the ground.

3. The Policy

We will uphold our values in all aspects of our business and encourage and train our employees to understand and adopt the company's values.

We recognise that our social, economic and environmental responsibilities to our stakeholders are integral to our business. We aim to demonstrate these responsibilities through our actions and within our corporate policies.

We take seriously all feedback that we receive from our customers and employees and, where possible, maintain open dialogue to ensure that we fulfil the requirements outlined within this policy.

We shall be open and honest in communicating our strategies, targets, performance and governance to our stakeholders in our continual commitment to sustainable development.

We shall provide, and strive to maintain, a clean, healthy and safe working environment. The safety of our employees, customers, and the wider community we affect is paramount.

We are focused on improving the quality of life within our local and wider communities. Integration between Delphini employees and local action/charity groups is actively promoted, along with a broader perspective on our daily actions – business and personal.

We shall strive to improve our environmental performance through implementation of our Environmental policies

We shall ensure a high level of business performance while minimising and effectively managing risk.

We will register and resolve customer complaints in accordance with our quality plan.

We shall operate an equal opportunities policy for all present and potential future employees

We will offer our employees clear and fair terms of employment and provide resources to enable their continual development

We shall maintain a clear and fair employee remuneration policy and shall maintain forums for employee consultation and business involvement

We shall provide safeguards to ensure that all employees are treated with respect and without sexual, physical or mental harassment

We shall uphold the values of honesty, professionalism, and fairness in our relationships

We will operate in a way that safeguards against unfair business practices through implementation of our Bribery policy.

We shall operate within the law and will not engage in tax evasion or the facilitation of tax evasion in the UK or overseas.

We shall encourage suppliers and contractors to adopt responsible business policies and practices for mutual benefit.

The Directors are responsible for the implementation of this policy and will make the necessary resources available to realise our corporate responsibilities. However, the responsibility for our performance to this policy rests with all employees throughout the company.



Dave Cormack
Managing Director
August 2023

2.6 Anti-Bribery Policy

1. Introduction

The Company is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. This Policy outlines the Company's position on preventing and prohibiting bribery in accordance with the Bribery Act 2010. The Company will not tolerate any form of bribery by, or of, its employees, agents or consultants or any person or body acting on its behalf. Senior management is committed to implementing effective measures to prevent, monitor and eliminate bribery.

2. Scope of this Policy

This Policy applies to all employees and officers of the Company, and to consultants, contractors, and agents acting for, or on behalf of, the Company ("associated persons") within the UK and overseas. Every employee and associated person acting for, or on behalf of, the Company is responsible for maintaining the highest standards of business conduct. Any breach of this Policy is likely to constitute a serious disciplinary, contractual or even criminal matter for the individual concerned and may cause serious damage to the reputation and standing of the Company.

The Company may also face criminal liability for unlawful actions taken by its employees or associated persons under the Bribery Act 2010. All employees and associated persons are required to familiarise themselves and comply with this Policy, including any future updates that may be issued from time to time by the Company.

This Policy covers:

- a) The main areas of liability under the Bribery Act 2010;
- b) The responsibilities of employees and associated persons acting for, or on behalf of, the Company; and
- c) The consequences of any breaches of this Policy.

3. The Bribery Act 2010

The Company is committed to complying with the Bribery Act 2010 in its business activities in the UK and overseas. Under the Act, a bribe is a financial or other type of advantage that is offered or requested with the:

- a) Intention of inducing or rewarding improper performance of a function or activity; or
- b) Knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.

A relevant function or activity includes public, state or business activities or any activity performed during a person's employment, or on behalf of another company or individual, where the person performing that activity is expected to perform it in good faith, impartially, or in accordance with a position of trust.

A criminal offence will be committed under the Act if an employee or associated person acting for, or on behalf of the Company:

- a) Offers, promises, gives, requests, receives or agrees to receive bribes; or
- b) Offers, promises or gives a bribe to a foreign public official with the intention of influencing that official in the performance of his/her duties (where local law does not permit or require such influence); and The Company does not have the defence that it has adequate procedures in place to prevent bribery by its employees or associated persons.

Prosecution and Penalties

If an individual is found guilty of a bribery offence, tried as a summary offence, they may be imprisoned for up to 12 months and fined up to £5,000. Someone found guilty on indictment, however, faces up to 10 years' imprisonment and an unlimited fine.

The crime of a commercial organisation failing to prevent bribery is punishable by an unlimited fine.

All employees and associated persons are required to comply with this Policy, in accordance with the Bribery Act 2010.

4. What is prohibited

The Company prohibits employees or associated persons from offering, promising, giving, soliciting or accepting any form of bribe. The bribe might be cash, a gift or other inducement to, or from, any person or company, whether a public or government official, or a private person or company, regardless of whether the employee or associated person is situated in the UK or overseas. The bribe might be made to ensure that a person or company improperly performs duties or functions (for example, by not acting impartially or in good faith or in accordance with their position of trust) to gain any commercial, contractual or regulatory advantage for the Company in either

obtaining or maintaining Company business, or to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

This prohibition also applies to indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance, for example through consultants, contractors or sub-contractors, advisors, customers, suppliers or other third parties.

5. Records

Employees and where applicable, associated persons, are required to take particular care to ensure that all company records are accurately maintained in relation to any contracts or business activities, including financial invoices and all payment transactions with clients, suppliers and public officials.

Due diligence should be undertaken by employees and associated persons prior to entering into any contract, arrangement or relationship with a potential supplier of services, agent, consultant or representative.

Employees and associated persons are required to keep accurate, detailed and up-to-date records of all corporate hospitality, entertainment or gifts accepted or offered.

6. Corporate Entertainment, Gifts, Hospitality & Promotional Expenditure

6.1 Provision

Principle

The Company permits corporate entertainment, gifts, hospitality and promotional expenditure that is undertaken:

- a) For the purpose of establishing or maintaining good business relationships;
- b) To improve the image and reputation of the Company or;
- c) To present the Company's goods or services effectively

provided that it is:

- a) Arranged in good faith, and
- b) Not offered or promised to secure an advantage for the Company or any of its employees or associated persons or to influence the impartiality of the recipient.

The Company will authorise only reasonable, appropriate and proportionate entertainment and promotional expenditure.

This principle applies to employees and associated persons, whether based in the UK or overseas.

Procedure

Employees and, where relevant, associated persons should submit requests for proposed hospitality and promotional expenditure well in advance of proposed dates to a Director.

Employees are required to set out clearly:

- a) The objective of the proposed client entertainment or expenditure.
- b) The identity of those who will be attending.
- c) The organisation that they represent; and
- d) Details and rationale of the proposed activity.

The Company will approve business entertainment proposals only if they demonstrate a clear business objective and are appropriate for the nature of the business relationship. The Company will not approve business entertainment where it considers that a conflict of interest may arise or where it could be perceived that undue influence or a particular business benefit was being sought for example, prior to a tendering exercise.

If an employee or associated person wishes to provide gifts to suppliers, clients or other business contacts, prior approval from a Director is required, together with details of the intended recipients, reasons for the gift and business objective. These will be authorised only in limited circumstances and will be subject to a cap of £50 per recipient.

The company understands that in certain circumstances low value gifts to customers, whilst in the course of a normal working relationship can occur and are entirely appropriate. Such gifts given out of common courtesy such as water, non-alcoholic beverages, tea, coffee, snacks or similar value items are not considered by the company to be covered by this policy.

Personal Friendships

It is recognised that where a business relationship has developed into a personal friendship, which exists outside the working environment, then personal presents are likely to be exchanged e.g., birthdays, Christmas, retirements. This is permissible provided that:

- a) Gifts are paid for by the individual.
- b) The employee informs his / her manager.
- c) Gifts are not offered or promised to secure an advantage for the Company or any of its employees or associated persons or to influence the impartiality of the recipient.

6.2 Receipt

Principle

The Company permits the acceptance of corporate entertainment, gifts and hospitality within reasonable limits provided that it is:

- a) Offered in good faith, and

- b) Not accepted in order for the provider to secure an advantage or to influence the impartiality of the recipient.
- c) Reported to a director.

6.2.1 Gifts

A gift is defined as any item or goods, or any service, which is provided by a third party for personal benefit at less than its commercial value. The only exceptions to this definition are merchandise samples, which are given to an employee for a bona fide business purpose.

Any gift, reward or entertainment received or offered by clients, public officials, suppliers or other business contacts should be reported immediately to a Director. In certain circumstances, it may not be appropriate to retain such gifts or be provided with the entertainment and employees and associated persons may be asked to return the gifts to the sender or refuse the entertainment, for example, where there could be a real or perceived conflict of interest.

The following types of gifts must not be sought or accepted:

- a) Cash, in any currency.
- b) Personal gifts received at home or at work.
- c) Gifts delivered to a hotel room to "welcome" on arrival.
- d) Payment by suppliers to subsidise events or visits.

Exceptions to the above are:

- a) Low value "promotional gifts" e.g., calendars, diaries inscribed with the donor's name.
- b) Traditional gifts e.g., flowers, fruit and confectionery of a reasonable value during prolonged absence from work, or birth of a child, or wedding etc.
- c) Gifts of a reasonable value intended to be shared by staff e.g., confectionery.

6.2.2 Personal Friendships

It is recognised that where a business relationship has developed into a personal friendship, which exists outside the working environment, then personal presents are likely to be exchanged e.g., birthdays, Christmas, retirements. This is permissible provided that:

- a) Gifts are paid for by the individual.
- b) The employee informs his / her manager.
- c) Gifts are not offered or promised to secure or receive an advantage for the Company or any of its employees or associated persons or to influence the impartiality of the recipient.

6.2.3 Travel / Accommodation Expenses

The following may not be accepted:

- a) Payment of abnormal business travel / accommodation expenses.
- b) Visits to any location when not necessary for a genuine business purpose.
- c) Travel / accommodation costs for family members.

6.2.4 Entertainment

The following may not be accepted:

- a) Use of donor's property and vehicles unless they are used in the ordinary course of business.
- b) Any type of level of entertainment, which is outside the bounds of, accepted business hospitality.
- c) Extension of business trips abroad for leisure purposes paid for by the host.

However, entertainment which is within the bounds of accepted business hospitality is acceptable, but permission must be sought by a director prior to attending any such hospitality.

7. Charitable Events

The company understands that entertainment can be offered in the form of organised charitable events. Such events may require sponsorship, donation of gifts and receipt of gifts through raffles, lotteries and auctions.

Involvement of such events by a registered charity is acceptable, however the spirit of this policy should be adopted, and prior approval must be gained from a Director.

Employees and, where relevant, associated persons should submit requests for proposed charitable event expenditure well in advance of proposed dates to a Director.

This policy recognises the hard work of charities and encourages the support of such organisations, but care must be taken to ensure that involvement does not breach this policy.

8. Conflict of Interest

Employees must not directly or indirectly maintain any outside business or financial interest or engage in any outside business or financial activity which conflicts with the interest of the Company, or which interferes with their ability to fully discharge their duties as employees.

Employees are required to disclose in writing to a Director any propriety or other financial interests that they may have in any organisation with which the Company does business with or with which it is in competition within order that a determination

may be made as to whether any conflict of interest arises. Reference should also be made to Conditions of Employment.

Employees that deal with outside organisations in the purchase of products, materials or services or who are in a position to influence such purposes should have no propriety or other financial interest either in those organisations furnishing such products, materials, or services or in any transaction for the furnishing of such products, materials or services.

This Policy is not intended to restrict investment or require disclosure of any investment by any employee in shares or any other security of any company listed on the stock exchange or regularly traded by national securities dealers provided that such investment does not exceed one per cent of the market value of the outstanding securities of such company.

9. Reporting Suspected Bribery

Principle

The Company depends on its employees and associated persons to ensure that the highest standards of ethical conduct are maintained in all its business dealings. Employees and associated persons are requested to assist the Company and to remain vigilant in preventing, detecting and reporting bribery.

Employees and associated persons are encouraged to report any concerns that they may have to a Director as soon as possible. Issues that should be reported include:

- a) Any suspected or actual attempts at bribery.
- b) Concerns that other employees or associated persons may be being bribed;
or
- c) Concerns that other employees or associated persons may be bribing third parties, such as clients or government officials.

Procedure

Any concerns should be brought to the attention of a Director to allow employees to record any incidents of suspected bribery. Any such reports will be thoroughly and promptly investigated in the strictest confidence. Employees and associated persons will be required to assist in any investigation into possible or suspected bribery.

Employees or associated persons who report instances of bribery in good faith will be supported by the Company. The Company will ensure that the individual is not subjected to detrimental treatment as a consequence of his/her report. Any instances of detrimental treatment by a fellow employee because an employee has made a report will be treated as a disciplinary offence. An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a

person in authority such as a manager, employees and associated persons should not agree to remain silent. They should report the matter to a Director.

Action by the Company

The Company will fully investigate any instances of alleged or suspected bribery. Employees suspected of bribery may be suspended from their duties while the investigation is being carried out. The Company will invoke its disciplinary procedures where any employee is suspected of bribery, and proven allegations may result in a finding of gross misconduct and immediate dismissal. The Company may terminate the contracts of any associated persons, including consultants or other workers who act for or on behalf of the Company who are found to have breached this policy.

The Company may also report any matter to the relevant authorities. The Company will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

10. Review of procedures and training

The Company will regularly communicate its anti-bribery measures to employees and associated persons. Refer to the relevant section in the Staff Handbook. The Directors are responsible for the implementation of this policy.

The Directors will monitor and review the implementation of this policy and related procedures on a regular basis, including reviews of internal financial systems, expenses, corporate hospitality, gifts and entertainment policies.

Employees and those working for, or on behalf of, the Company are encouraged to contact a Director with any suggestions, comments or feedback that they may have on how these procedures may be improved.

The Company reserves the right to amend and update this Policy as required.

11. Breach of Policy

Failure to comply with this Policy will constitute a breach of regulations and appropriate disciplinary action may be taken as specified in the Company's Disciplinary Procedures, which may in some instances lead to dismissal.



Dave Cormack
Managing Director
August 2023

2.7 Quality Statement

The company are committed to providing our customers with, on time and a competitive cost, a fault free and reliable service.

Safety plays an increasing vital role in the way companies are managed. In order to maintain profitability and dependability, you require a supplier that understands your individual needs, and provides the right products and advise quickly and efficiently.

Delphini can provide the equipment and solutions you need – when you need it – tested, certified equipment that is totally reliable.

We have developed a range of products and services that is ideally suited for the needs of industry. Our workshop and stores, based in Tilbury, can supply, manufacture and test all types of lifting equipment as well as supply fabrication and machined components.

Our Engineers are fully trained, with many years of experience and are equipped to solve problems on site.

To achieve this, we continually review and improve our management system and its processes. Measurable objectives are set by the management, and it is essential that an effective Quality Assurance system is developed, implemented and constant improvements made to the system, which is able to satisfy BS EN ISO 9001 2015, interested parties and our customer requirements.

We understand customer needs and expectations continually change, there for we must work closely with current and potential customers to meet these changes in order to offer suitable products/services ahead of our competition.

The procedures and practices outlined in the Quality Documentation are there for that purpose and to ensure staff understanding of meeting customer, statutory and regulatory requirements.

This is to provide confidence to our customers and therefore the implementation of the Quality Policy is mandatory on all our employees.



Dave Cormack
Managing Director
August 2023

2.8 Business Continuity Plan

1. Introduction

The Company recognises that in the event of major failure due to fire, flood, theft or other forces outside of our control, effective planning is key to ensuring business continuity.

This plan cannot cover all eventualities but does cover those that we perceive to be most likely, taking into consideration the environment, locality and business type.

2. Scope of this Plan

This Plan covers Office, Stores and Workshop functions. It is considered that Site Service engineers can work effectively from their vehicles once supervisor - office functions have been restored.

3. Assessment

Office

IT and communication have been identified as the main drivers for business continuity.

Communication:

Customers, suppliers and support companies must be able to communicate with staff. Most communication is carried out via telephone and email.

Email communication is accessed via office PCs and mobile devices.

IT:

Information on financial, operational, stock, health & Safety and human resources are key as access for day-to-day operations is required.

Stores

Access to stock, stock records, equipment as well as a suitable safe place to accept and make deliveries has been identified as the main drivers for business continuity.

Stock & Stock Records:

Stock records are kept on the company's IT system. Access to stock is as important as knowing what stock is on the premises. Stock can be replaced but the details must be identified for this to happen.

Equipment:

Equipment such as tools and fixing are required for some Site Service jobs. However key materials and equipment is stored on company vans.

Stores Area:

An area to store, accept supplier deliveries and to despatch goods is required. The area must be under cover and secure with suitable means of loading i.e., a forklift truck.

Workshop

A safe secure undercover area with 415V & 240V power outlets with steel work equipment have been identified as the main drivers for business continuity. The area must be in the same location as the stores to allow for material deliveries and dispatch of completed goods.

Equipment:

Welding plant, oxy/acetylene, drilling and cutting gear is required for a minimum of two welders for the continued production of steelwork jobs.

Workshop Area:

It is key that the area be adjacent to or close to the stores area. The area must have suitable lighting and be safe and secure. Access must be via a front opening roller shutter type door to allow materials and finished items to be moved. Suitable power for the equipment must be in place.

Financial

It is recognised that the financial wellbeing of the company has an overriding importance to the continued running of the business.

Access to debtor and creditor information as well as historic accounts, PAYE and tax issues are key.

4. What Could Happen

Fire

Theft

Flood

Terrorism / attack

Unable to access the building (other reasons such as industrial dispute in the Port or very poor weather)

Disease outbreak

5. What is in Place

Insurance

The company will hold the following insurance policies:

Combined Commercial Insurance including Buildings, Contents and Business Interruption.

Directors & Officers Insurance with Legal Cover.

Fire

A Fire Risk Assessment in accordance with PAS79 will be completed by a competent person. The recommendations of this assessment will be implemented.

Fire detection and fire extinguishers shall be checked on a six-monthly basis, the company will have a trained Fire Warden to complete this function.

Fire extinguishers are to be serviced yearly in accordance with BS5306 by a BAFE certified company.

The company's hot work procedures call for all hot works to be finished 30minutes before the workshop is vacated and 1 hour before the main building is locked. A fire check is completed within that hour.

Combustible materials are segregated as much as possible and flammable liquids and gas are stored in approved containers.

Disease outbreak

The company has a specific infectious disease policy that covers disease outbreak in a much greater detail.

The Company has a duty of care to maintain a healthy and safe working environment. This includes taking steps to minimise the risk of employees contracting an infectious disease from colleagues and customers.

To this end the Company will:

- Promote awareness and understanding of the issues and concerns relating to the transmission of infectious diseases in the workplace.
- Provide information on the nature and spread of common infectious diseases, including how to identify the symptoms and signs and the procedures to be followed in the event of individual illness or an outbreak affecting a significant number of employees.
- Take decisions to exclude persons who may have or deemed to have an infectious disease with the interest to protect the health of other Delphini employees.

Maintenance

The company shall ensure that the buildings are regularly maintained and checked. All companies used for maintenance shall be competent.

Electrical work shall be completed in accordance with the IET Wiring Regulations 17th Edition (BS 7671:2008).

Drain and down pipes are checked yearly to ensure that blockages are cleared.

Security

The company pays for and has the benefit of Port of Tilbury security via main entrance access, CCTV cameras & mobile patrols.

The company has a burglar alarm installed and serviced by an NSI approved company.

CCTV Cameras which can be accessed remotely are also installed.

Storage

All items that could be affected by flood are either stored on the top floor area or stored on pallets to raise them off the floor.

Human Resources

The company issues all staff the following:

Employment Contract
Staff Handbook
Employment and Policies Procedures

All members of staff are aware of their responsibilities to the company as part of their employment. The company also recognises that all employees should be treated fairly, within the law and in accordance with the procedures laid down in the above documents.

6. The Plan

Office

Communication:

All key email addresses are to be transferred to Microsoft Exchange and are to be backed up to a cloud-based server. This allows for access to the email accounts from any mobile device or new PC. Passwords to the email's accounts are to be stored in a secure section of the server for access by directors when required.

Telephones:

The main company telephone number can be diverted using the VOIP account to any mobile or other landline. Also, an answering service can be started again using the VOIP app.

Passwords and account details are to be stored in a secure section of the server for access by directors when required.

IT:

All business operations, job records, sales records, stock records, accounts records, communications, quotations are to be entered onto the company server at least daily. Storage of company information is not allowed on individual computer drives.

The server is to be backed up instantaneously over the cloud and be available remotely using suitable secure software.

Where information cannot be stored on a computer, paperwork is to be stored in lockable fireproof cabinets. Where practical, paperwork that is critical is to be scanned onto the server as a backup.

Directors and senior staff are to assess the amount of time that the office is not able to function. This assessment is to also include the possibility of staff working from home and or a temporary office.

Stores

Directors and senior staff are to assess the amount of time that the stores are not able to function. This assessment is to also include any damage to stock and equipment and or missing stock and equipment.

Directors and senior staff are to assess any goods that were due to be despatched or had just been received.

Agreement is to be made with nominated approved suppliers to instigate the following:

Delivery of sales orders direct to customers, utilizing Delphini paperwork (emailed).

Purchase of consignment stock.

Identification of consumables that can be held in stock for collection by service staff.

Agreement is to be made with nominated transport suppliers to instigate the following:

Collection of goods from suppliers for delivery.

Acceptance of Delphini goods and equipment for storage, logistics, and delivery to customer.

Directors and managers are to identify alternative storage premises. This may include temporary containerized storage and or storage of equipment in service vehicles.

Workshop

Directors and senior staff are to assess the amount of time that the workshop is not able to function. This assessment is to also include any damage to work in progress, steel / profile stock and equipment.

Directors and senior staff are to assess the work in progress and any damage to the same and contact customers accordingly.

Agreement is to be made with nominated approved suppliers to manufacture goods on the company's behalf. In such cases materials will be supplied delivered direct to the supplier premises to reduce costs.

Directors and managers are to identify alternative workshop premises. This may include temporary rental of premises and hire of equipment etc from approved suppliers.

7. Communication to the Outside World

It is clear that supplier, customers, insurers, bankers, accountants etc need to be kept informed of any occurrence that will affect the business.

The directors will meet to decide how and when it is applicable to inform various organisations. In the event of minor occurrences, it may be possible to continue business with little affect. Major occurrences will impact the company's business more.

It is important in such instances that staff know that the directors must guide the company and that guessing, and gossip could undermine the business and their future.

8. Assessment and Trial

Clearly a full trial of a major incident is not possible with the resources of the company or in fact necessary. However, this document has been reviewed following a minor flood of the stores and workshop area which enabled us to assess this plan.

We found that no stock was damaged, this was due to the general good housekeeping procedures followed by the Stores Supervisor, all goods stored at floor level were on pallets which kept them above the floodwater.

Office staff could function using mobile devices and the telephones were easily diverted using the VOIP app.

The main email addresses were remotely monitored, and a temporary auto responder was set up.

The workshop was little affected, and staff were employed on several site jobs within the Port to make best use of their time. As such the company suffered very little financially.

The assessments in this plan were found to be adequate as were the precautions in place to avoid other incidents.

9. Corona Virus Assessment

Unfortunately, the current Corona virus pandemic and subsequent shutdown has forced all the country and much of the world to put in place plans such as this, in a way not previously imagined.

A separate Covid action plan has been developed and will be released to all staff. However, the following assessment has been made:

Office

Communication:

Many staff have been furloughed on the Government JRS however staff that are working are doing so from home laptops. Access to all company information is possible via cloud-based systems in place. Further efforts to digitalise all documents and not accept of documents in paper form, particularly in accounts related functions are being implemented. This includes an automated system to transfer and save emailed invoices and statements.

Microsoft Exchange is working well and Microsoft Teams and to a lesser degree Zoom is being used often.

Telephones:

The main company telephone number is being diverted using the VOIP system and key staff have the mobile app or have their desk VOIP phones at home.

IT:

The recent transfer to cloud-based systems for Sage and existing system for server documents is fully integrated and working well.

A digital manufacturing workshop job board “CRM” is being developed to enable seamless integration with staff working from home and the office.

Future IT investment has been identified in the areas of an App or web-based RAMs system and a digital / mobile time card system to replace paper or pdf documents currently being used.

Stores

Stores is still functioning using emailed pdf documents for delivery notes and inline booking systems.

Workshop

Deliveries, manufacture, and despatches are being planned through the CRM job board system. No issues have been identified.

Site Service

Where required to work on essential projects and sites our site service operations are working normally. RAMs and timesheets in a form of an App or web-based system would be more efficient and reduce the need for paper documents.

2.9 Drugs and Alcohol Policy

This statement sets out Delphini's Policy in respect of any employee or contractor carrying out safety critical activities or Sentinel Competence Card holders whose proper performance of their duties is or may be impaired as a result of drinking alcohol or taking drugs. Acts of Parliament, Regulations, Codes of Practice, Guidelines and readily available education materials support it including:

- Transport and Works Act 1992
- Health and Safety at Work etc Act 1974
- Road Traffic Act 1988
- Misuse of Drugs Act 1971
- Management of Health Safety at Work Regulations 1999

Provided that employees and contractors adhere to the provisions of this policy and fully co-operate with the Company's pre-employment, planned, unannounced or "for cause" alcohol and drugs screening arrangements they will normally be able to demonstrate compliance with the above statutory provisions.

Co-operate with the Delphini planned, unannounced or "for cause" alcohol and drugs screening arrangements

Policy

Delphini will take all reasonable steps to ensure that employees/contractors are made aware of the contents of this statement together with relevant sections of Acts of Parliament and the implications therein. Furthermore, as a reasonable employer we will have in place procedures to prevent, so far as is reasonably practicable, an offence under the above-mentioned Statutory Provisions and a process to measure the effectiveness of such procedures.

It is a requirement that no employee or contractor shall:

- Report or endeavour to report for duty having just consumed alcohol or being under the influence of drugs.
- Report for duty in an unfit state due to the use of alcohol or drugs
- Be in possession of drugs or alcohol in the workplace, including locker rooms or in vehicles
- Consume alcohol or drugs whilst on duty.

Alcohol Consumption Guideline

The Statutory Guidelines enforced by the Police for the maximum amount of alcohol in the bloodstream is 80mg/100ml of blood.

Prohibited drugs

Include as a minimum the following drugs or drug groups: -

- Cannabis
- Cocaine
- Amphetamines
- Barbiturates
- Benzodiazepines
- Dextrapropoxyphene
- Methadone
- Opiates

It should also be noted that the abuse of other legal substances such as glue or solvents is prohibited under this Policy.

In addition, many medicines obtained with or without prescription can affect performance at work and employees must not report for duty if affected by such medicines. Examples include Tranquillisers, Sleeping Pills, and Antihistamines for Hay Fever and some cough/cold remedies.

On being prescribed medicines individuals must always seek advice from their doctor as to the effect the medicine may have on their performance. In the case of non-prescribed medicines always read the instructions carefully and seek the advice of a pharmacist.

Employees should contact their manager / HSQE Advisor in confidence if they believe they have or are developing alcohol or drugs related problems.

Employees should contact their manager / HSQE Advisor in confidence if they believe a work colleague has alcohol or drugs related problems which may compromise safety.

Should an employee be found in breach of this Policy normal disciplinary procedures may result in charges of Gross Misconduct and dismissal. In the case of a “relevant person” who is found to be in breach of this Policy it should be stressed that only in exceptional circumstances will summary dismissal not be applied.

Should subcontractor personnel be found in breach of this Policy the individual will be prohibited from further work with Delphini.

Delphini will ensure that details of the individual and breach of this Company’s Alcohol and Drugs Policy are reported immediately to Network Rail/London Underground Ltd as required by their standards and reserves the right to inform the Police of any such behaviour or of any suspicions in respect of the use or possession of illegal substances.

Any employee who has declared an alcohol or drugs dependency problem will be assisted wherever possible by Delphini to address the problem. However, any such declaration will not confer immunity from disciplinary action for any breach of this Policy.

Any employee / contractor who refuses to take a drug and alcohol test, then the test will be treated as a positive result.



Dave Cormack
Managing Director
August 2023

2.10 Infectious Diseases in the Workplace Policy

1. Introduction

The Company has developed this policy on minimising the risk of infectious diseases spreading in the workplace through effective prevention and management.

The policy seeks to ensure that employees are aware of the issues relating to infectious diseases at work and provides guidelines for managers and others on minimising the risk of employees contracting diseases through work and on dealing with infections if contracted. Infectious diseases can be airborne (for example, corona virus, meningitis or TB), blood borne (for example, hepatitis) and faecal oral borne (for example, gastroenteritis).

Infectious diseases that are new and spread quickly may impact on us as individuals, the Company's operations. It is important that we take measured and appropriate preventative actions to ensure that we remain safe and well and to ensure business continuity as far as is practicable. In such circumstances, the Company will closely monitor the situation and take appropriate action which may include:

- Working from home where this is practical.
- Self-quarantine in accordance with advice as provided by the Department of Health and the Health Protection Agency.
- Reducing all non-essential travel where possible.

2. Business case

Infectious diseases emerge and spread quickly across the world as a result of global travel and other interconnections. Workplaces are an effective incubator for disease, particularly if hygiene and infection control is poor or if employees go to work when sick.

Infectious diseases can have a potentially significant impact on the business. An employee off sick with a flu-related illness is typically absent for six days; with other viruses such as the corona virus, the period of infection and recovery is longer.

3. Minimising the risk of disease transmission

The Company has a duty of care to maintain a healthy and safe working environment. This includes taking steps to minimise the risk of employees contracting an infectious disease from colleagues and customers.

To this end the Company will:

- Promote awareness and understanding of the issues and concerns relating to the transmission of infectious diseases in the workplace.
- Provide information on the nature and spread of common infectious diseases, including how to identify the symptoms and signs and the procedures to be followed in the event of individual illness or an outbreak affecting a significant number of employees.

4. Standard hygiene practices at work

The Company will develop routine procedures for hygiene control, taking into account professional guidelines and advice from statutory bodies, such as the Department of Health and the Health Protection Agency.

The Company will take steps to raise employees' awareness of these procedures through education, training materials and induction sessions.

Employees are encouraged to adopt effective hand hygiene practices including: Frequently and thoroughly clean hands with an alcohol-based hand sanitizer or, ideally, soap and water. Wash thoroughly for a minimum of thirty seconds.

When coughing and sneezing cover mouth and nose with flexed elbow or tissue – throw tissue away immediately and wash hands.

Avoid touching your eyes, nose or mouth.

Avoid close contact with anyone who has a fever or cough.

If you feel you are suffering from flu-like symptoms such as respiratory symptoms, fever, cough, shortness of breath or breathing difficulties contact your local health advisory service. Seek advice from the NHS advice line on 111.

5. When employees have contracted infectious diseases

Employees with infectious diseases will not be excluded from work, nor have their duties restricted, provided they are physically and mentally fit for work and their continued attendance in the workplace does not present a significant risk of disease transmission to other employees or customers.

The decision as to whether or not an employee with an infection should stay away from the workplace will take into account:

- How the infection is transmitted and the ease of transmission.
- The typical duration of the infection; and
- The potential harm that the infection can cause to other employees and customers.

Employees have a responsibility to minimise the risk of disease transmission to work colleagues and customers and are expected to perform good hygiene control measures and use personal protective equipment where provided.

6. Personal protective equipment

Employees issued with personal protective equipment to minimise the risk of work-related infection should use it appropriately and clean their hands immediately after removing items such as gloves and facemasks.

7. Disease outbreak

In the event of a disease outbreak affecting a significant number of employees, managers and other designated employees will monitor and coordinate activities to control the outbreak. The work of this group will include developing work rules in the event of an outbreak, including exclusions/restrictions from work and the reassignment of duties.



Dave Cormack
Managing Director
August 2023

2.11 Equality and Diversity Policy

Delphini is committed to encouraging diversity and eliminating discrimination in both its role as an employer and to support our clients' policies. Delphini aims to create a culture that respects and values each other's differences, which promotes dignity, equality and diversity, and that encourages individuals to develop and maximise their true potential. We are committed wherever practicable to achieving and maintaining a workforce that broadly reflects the local community in which we operate.

Our policy is designed to ensure that current and potential workers are offered the same opportunities regardless of race, nationality, ethnic origin, age, religion or belief, sex, sexual orientation, marital status, domestic circumstances, disability, pregnancy, gender reassignment, civil partnership or any other characteristic unrelated to the performance of the job. We seek to ensure that no one suffers, either directly or indirectly, as a result of unlawful discrimination. This extends beyond the individual's own characteristics, to cover discrimination by association and by perception.

Delphini will not tolerate discrimination either direct or indirect, which can take different forms, for example:

- treating any individual less favourably than others on grounds of a protected characteristic (sex, race, marital status, religion or belief, sexual orientation, disability, age, pregnancy, gender reassignment or civil partnership)
- expecting a person, solely on the grounds stated above, to comply with requirements that are different to the requirements for others, for any reason whatsoever
- imposing on an individual requirement that are in effect more onerous than they are on others. This would include applying a condition (which is not warranted by the requirements of the position) which makes it more difficult for members of a particular group to comply than others not of that group
- harassment i.e., unwanted conduct which has "the purpose, intentionally or unintentionally, of violating dignity, or which creates an intimidating, hostile, degrading, humiliating or offensive environment" for the individual
- victimisation – i.e., treating a person less favourably because he or she has committed a "protected act". "Protected acts" include previous legal proceedings brought against the employer or the perpetrator, or the giving of evidence at a disciplinary or grievance hearing or at tribunal or making complaints about the perpetrator or the employer or their alleged discriminatory practices.
- discrimination by association, i.e., someone is discriminated against because he/she associates with someone who possesses a protected characteristic
- discrimination by perception, i.e., discrimination on the grounds that the person is perceived as belonging to a particular group, e.g., sexual orientation, religion or belief, irrespective of whether or not this is correct
- any other act or omission of an act, which has the effect of disadvantaging one person against another, purely on the above grounds.

Responsibility for this policy

The Directors have ultimate responsibility for this policy.

The overall responsibility for implementing and monitoring the effectiveness of this policy rests with the Senior Management of Delphini.

Managers and supervisors have a crucial role to play in promoting equality of opportunity in their own areas of responsibility.

All staff, irrespective of their job or seniority, will be given guidance and instruction, through our induction and other training, as to their responsibility and role in promoting equality of opportunity and not discriminating unfairly or harassing colleagues or job applicants, nor encouraging others to do so or tolerating such behaviour. Disciplinary action, including dismissal, may be taken against any employee found guilty of unfair discrimination or harassment.



Dave Cormack
Managing Director
August 2023

2.12 Anti-Slavery and Human Trafficking Policy

Slavery is illegal and a violation of human rights. There are many forms of Modern Slavery including forced labour, child labour, exploitation, being controlled by an employer, debt bondage, being physically constrained, being sold or treated as a commodity and having restrictions on freedom of movement. These acts involve a person losing their freedom by being exploited by another for personal or commercial gain.

This company has a zero-tolerance approach to Modern Slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships. We will implement and enforce effective systems and controls to ensure Modern Slavery is not taking place in our own business and supply chains.

We are committed to ensuring our business is transparent, as such we will comply with the disclosure obligations under the Modern Slavery Act 2015.

This company expects our contractors and suppliers to uphold high standards in all business practices; as part of the contracting processes, we include prohibitions against the use of staff sourced from forced, compulsory or trafficked labour, anyone held in slavery or servitude. We expect their suppliers to hold these high standards. We will be auditing our higher risk suppliers, as determined by our predetermined criteria.

This policy applies to all persons working for, or on behalf of this company, in any capacity. This includes but does not limit the policy applicability to, employees, agency workers, temporary staff, agents, contractors, external consultants and third-party representatives. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

All employees are responsible for the prevention, detection and reporting of Modern Slavery in any part of our business or supply chains is. Employees are required to avoid any activity that might lead to a breach of this policy, and the Modern Slavery Act 2015.

You must notify your manager 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.

Employees are encouraged to raise concerns about suspicions of Modern Slavery in any parts of our business or supply chains at the earliest possible stage. All employees shall be briefed of this policy/ anonymous reporting procedures during their induction and given an awareness training. If you are unsure whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply

Our zero-tolerance approach to Modern Slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them. Suppliers are asked to comply with our Anti-Slavery and Human Trafficking policy from the onset of the relationship. Suppliers who are unwilling to comply will not be on boarded.

Any employee who breaches this policy will face disciplinary action. This could result in action up to dismissal. We may terminate our relationship with other employees, suppliers and any other associates working with us if they breach this policy.



Dave Cormack
Managing Director
October 2022

2.13 Whistleblowing Policy

A whistleblower as defined by this policy is an employee of who reports an activity that he/she considers to be illegal or dishonest to one or more of the parties specified in this Policy. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management are charged with these responsibilities.

Examples of illegal or dishonest activities are violations of legislation, local laws industry standards or other fraudulent financial reporting.

If an employee has knowledge of or a concern of illegal or dishonest fraudulent activity, the employee is to contact his/her immediate supervisor or the Director. The employee must exercise sound judgment to avoid baseless allegations. An employee who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination of employment.

Whistleblower protections are provided in two important areas -- confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defence. The Company will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes he/she is being retaliated against must contact the Director immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

Employees with any questions regarding this policy should contact the Managing Director or Operations Manager.



Dave Cormack
Managing Director
August 2023

2.14 Energy Saving and Energy Awareness Policy

Delphini Limited is committed to saving energy and is fully aware of the impact that fossil fuel energy has on both the environment and our business costs.

In carrying out its working operations Delphini recognise the importance of maintaining and protecting the environment. The company recognises that effective energy management makes good business sense and will be a fundamental and integral part of our business strategy.

To ensure we achieve these standards, procedures will be implemented to include the following:

- Conserving the use of resources, particularly those which are scarce or non-renewable, by;
- Renewing company plant and vehicles to ensure fuel efficiency. This will include site plant that can be electric or hybrid rather than fully petrol/diesel.
- When considering hired in plant, solar and or hybrid plant will be chosen where practical.
- Company vehicle “pooling” and combined vehicle deliveries will be considered on all site jobs to reduce carbon emissions from vehicles.
- Diesel / petrol plant use will be monitored to ensure that engines are not left running unnecessarily.
- Deliveries to our depot / workshop and to customers will be planned to ensure that energy saving is considered, to avoid multiple journeys where unnecessary.
- All office and workshop lighting will be changed to LED and timers will be placed on all lights where possible.
- Nightly energy checking will be put in place to ensure that lights are switched off and that office machines and plant are taken off standby and switched off at the mains when not in use.
- Requiring our suppliers and contractors to have a proper regard for our Energy Saving and Energy Awareness Policy for the goods and services they provide for us.
- Communicating this policy to our staff, suppliers and customers (and any other interested parties, upon request) and seeking their help to implement it.
- Assessing energy consumption and energy costs on a twelve monthly basis to understand the impact of this policy and to identify ways to reduce our energy usage and associated costs.



Dave Cormack
Managing Director
August 2023

2.15 Ethical and Sustainable Procurement Policy

Delphini Ltd is committed when purchasing goods and/or services to select those which are produced and delivered without abuse or exploitation of persons involved and have the least negative impact on the environment; as far as is reasonably practicable.

Where a supplier demonstrates evidence of a breach of these conditions then the company will take steps to inform the supplier of the alleged non-conformance and the need to take corrective actions to meet the required conditions; giving a reasonable time deadline for such. Where the supplier fails to meet these requirements within the timescale given then the company will seek an alternative supplier at the earliest possible time.

The ethical codes we require of our suppliers are those we apply within the company and include:

- Employment is freely chosen by the workers involved
- The supplier recognises the rights, of the workers involved, for freedom of Delphini and collective bargaining
- The working conditions for the workers are safe and hygienic
- The supplier pays living wages
- The working hours are not excessive for those involved
- The supplier does not practice any form of unlawful discrimination of people
- Regular employment contracts are given to the workers whenever possible
- The supplier will not treat others in a harsh or inhumane manner at any time
- Applicable Labour/Employment Law must be fully adhered to by the supplier
- Child labour shall not be used by the supplier
- Undue and unnecessary use of materials by the supplier is avoided
- Recycled materials will be used by the supplier whenever possible and practicable
- Steps will be taken by the supplier to conserve scarce resources
- The supplier will ensure efficient energy use and will minimise harmful emissions
- The supplier will minimise waste and ensure safe disposal of such
- The supplier will not act in any way that involves illegal, fraudulent, unprofessional or corrupt behaviour

All employees of Delphini Ltd will:

- Declare in advance any interest they may have with any supplier, or bidding supplier, or customer of the company and be prepared to withdraw from those dealings if required

- Adopt strategies and processes that deliver best value for money in procuring supplies or services; whilst eliminating harm to those people and minimising use of scarce resources and causing harm to environments involved
- Develop supply relationships that foster mutual understanding and respect of ethical supply chain codes
- Ensure our supply requirements are specified in such a way as to ensure suppliers are clear about the ethical conditions of the company
- Act impartially, in a fair and reasonable manner, and comply with applicable legislation, competition and trading best practices and professional behaviour in all supply chain activities
- Ensure payment for goods and services are made in accordance with the terms agreed, subject to satisfactory supply
- Comply with information security requirements and sensitivities

PRINCIPLES AND SCOPE OF THE POLICY

The Board acknowledges they have ultimate responsibility for ensuring that the company has in place a system of appropriate ethical supply chain guidance for staff. This guidance is designed to assist managers and staff involved in the purchasing and delivery of supplies and services.

KEY OPERATIONAL FRAMEWORK

The company's systems of staff induction and training programmes will include education on this policy; however no such systems can provide absolute protection against a failure to comply with ethical principles and codes.

The Board is responsible for:

- Ensuring the development and maintenance of effective staff education and guidance to prevent and minimise non-conforming behaviour,
- Ensuring the carrying out of vigorous and prompt investigations if a non-conformance is alleged or found to occur,
- Ensuring appropriate corrective actions are taken to remove or minimise the risks of such behaviour recurring.

Managers should assess the types of supply chain behaviours and risk involved in the operations for which they are responsible; to regularly review and test the communication, education, practice guidance and control systems for which they are responsible; to ensure that controls are being complied with; and to satisfy themselves that their systems continue to operate effectively.



Dave Cormack
Managing Director
August 2023

2.16 Anti-Fraud Policy

Delphini maintains a system of internal controls to support achievement of business objectives. This system of controls also aims to prevent fraud. All employees of Delphini have an obligation to adhere to internal control procedures and to observe the Delphini Business Conduct Policy.

Delphini acknowledges that while an adequate system of internal controls will act as a strong deterrent to fraud, there is no guarantee that fraud can always be prevented. Fraud is often found out by accident, for example on investigation of what would otherwise appear to be an insignificant discrepancy. It is Delphini policy, therefore, that the procedure on discovery of fraud should always be followed where fraud is suspected, even if the incident seems relatively insignificant.

This procedure applies and is applicable to all employees and directors of Delphini. Training shall be given on policy during annual policy briefings and/or internal/external training sessions.

1. Definition of fraud

In law, fraud is committed when a person dishonestly makes a false representation, fails to disclose information or abuses a position of trust with intent to gain or cause loss. For practical purposes, fraud may be defined as deliberate misinterpretation which causes loss or damage to Delphini.

2. Roles and responsibilities for detection of fraud

Every member of staff is responsible for the security of Delphini assets, and all staff should be alert to the possibility that unusual events or transactions could be symptoms of fraud or attempted fraud. Fraud may also be highlighted as a result of specific management checks or be brought to management's attention by a third party. Additionally, irregularities occasionally come to light in the course of internal or external audit reviews.

3. Procedure on discovery of a fraud

Any employee who believes that they have discovered a fraud must report it immediately. This would normally involve raising the issue with the employee's line manager. However, in circumstances where this is not appropriate, then they should report to the Managing Director directly.

The employee and manager should not discuss the alleged fraud with any other member of staff until the allegation has been investigated. The need for confidentiality is important to:

- avoid alerting the individual(s) involved and providing the opportunity for destruction of evidence;
- ensure that Delphini does not falsely accuse a person or employee of misconduct; and

- manage publicity and protect the Delphini reputation.

The line manager will report the facts of the allegation to the Managing Director, who will determine whether the available information warrants further action. If it does, they will be responsible for:

- agreeing with the Administration Manager how to investigate the allegation further. It may be appropriate for the investigation to be undertaken within the local business stream, or with the involvement of external auditors; and
- taking appropriate steps to freeze relevant transferable assets and prevent destruction of evidence while the allegations are investigated, e.g. by stopping access to bank accounts or suspending members of staff. Suspension at this stage does not imply guilt; it is a safeguard to prevent the removal or destruction of evidence.

The allegation will be investigated promptly, and the investigation fully documented to ensure evidence is available in the event of a subsequent court case or disciplinary procedure.

Dave Cormack



Managing Director
August 2023

2.17 GDPR / Info Security Policy

Introduction

This information security policy is a key component of Delphini's management framework. It sets the requirements and responsibilities for maintaining the security of information within Delphini. This policy may be supported by other policies and by guidance documents to assist putting the policy into practice day-to-day.

Aim and Scope of this policy

The aims of this policy are to set out the rules governing the secure management of our information assets by:

- - Preserving the confidentiality, integrity and availability of our business information
 - Ensuring that all members of staff are aware of and fully comply with the relevant legislation as described in this and other policies
 - Ensuring an approach to security in which all members of staff fully understand their own responsibilities
 - Creating and maintaining within the organisation a level of awareness of the need for information
 - Detailing how to protect the information assets under our control
 - This policy applies to all information/data, information systems, networks, applications, locations and staff of Delphini or supplied under contract to it.

Responsibilities

Ultimate responsibility for information security rests with the Managing Director of Delphini, but on a day-to-day basis Greg Moore shall be responsible for managing and implementing the policy and related procedures.

Responsibility for maintaining this Policy, the business Information Risk Register and for recommending appropriate risk management measures is held by Greg Moore.

Both the Policy and the Risk Register shall be reviewed by Company Board members at least annually.

Line Managers are responsible for ensuring that their permanent staff, temporary staff and contractors are aware of:-

- - The information security policies applicable in their work areas
 - Their personal responsibilities for information security
 - How to access advice on information security matters

All staff shall comply with the information security policy and must understand their responsibilities to protect the company's data. Failure to do so may result in disciplinary action.

Line managers shall be individually responsible for the security of information within their business area.

- Each member of staff shall be responsible for the operational security of the information systems they use.
- Each system user shall comply with the security requirements that are currently in force, and shall also ensure that the confidentiality, integrity and availability of the information they use is maintained to the highest standard.
- Access to the organisation's information systems by external parties shall only be allowed where a contract that requires compliance with this information security policy is in place. Such a contract shall require that the staff or sub-contractors of the external organisation comply with all appropriate security policies.

Legislation

Delphini is required abide by certain UK, European Union and international legislation. It also may be required to comply to certain industry rules and regulations.

The requirement to comply with legislation shall be devolved to employees and agents of the Delphini, who may be held personally accountable for any breaches of information security for which they are responsible.

In particular, Delphini is required to comply with:

- The Data Protection Act (1998)
- The Data Protection (Processing of Sensitive Personal Data) Order 2000.
- The Copyright, Designs and Patents Act (1988)
- The Computer Misuse Act (1990)
- The Health and Safety at Work Act (1974)
- Human Rights Act (1998)
- Regulation of Investigatory Powers Act 2000
- Freedom of Information Act 2000
- General Data Protection Regulations 2018

Personnel Security

Contracts of Employment

Staff security requirements shall be addressed at the recruitment stage and all contracts of employment shall contain a security and confidentiality clause.

References for new staff shall be verified and a passport, driving license or other document shall be provided to confirm identity.

Information security expectations of staff shall be included within the employee's induction and signed by each member of staff accessing Delphini's information and systems.

Whenever a staff member leaves the company their accounts will be disabled the same day they leave.

Information Security Awareness and Training

The aim of the training and awareness programmes are to ensure that the risks presented to information by staff errors and by bad practice are reduced.

Information security awareness training shall be included in the staff induction process and shall be carried out annually for all staff who access Delphini's systems.

An on-going awareness programme shall be established and maintained in order to ensure that staff awareness of information security is maintained and updated as necessary.

Intellectual Property Rights

The organisation shall ensure that all software is properly licensed and approved by Greg Moore or any Company Director.

Individual and Delphini intellectual property rights shall be protected at all times.

- Users breaching this requirement may be subject to disciplinary action.

Access Management

Physical Access

- Only authorised personnel who have a valid and approved business need shall be given access to areas containing information systems or stored data.

Identity and passwords

All passwords must offer an adequate level of security to protect systems and data as a minimum all passwords shall be ten characters or longer and contain at least two of the following: uppercase letters, lowercase letters and numbers.

All passwords including administrator-level shall be changed at least every 90 days and where available, two-factor authentication shall be used to provide additional security

All users shall use uniquely named user accounts and generic user accounts that are used by more than one person or service shall not be permitted for use.

User Access

Access to information shall be based on the principle of "least privilege" and restricted to authorised users who have a business need to access the information. New user accounts can only be set up after authorised from a Company Director.

All company computers will only have the required user accounts active on each machine all accounts which are not required for use by the company will be removed, such as guest accounts.

Administrator-level access

Administrator-level access shall only be provided to individuals with a business need who have been authorised by Greg Moore.

A list of individuals with administrator-level access shall be held by Greg Moore and shall be reviewed every 6 months.

Administrator-level accounts shall not be used for day-to-day activity. Such accounts shall only be used for specific tasks requiring administrator privileges. 2 factor authentication shall be used for all administrator level passwords.

Administrator level accounts will not be used for email or for accessing the internet for web browsing

Application Access

Access to data, system utilities and program source libraries shall be controlled and restricted to those authorised users who have a legitimate business need e.g. systems or database administrators.

Authorisation to use an application shall depend on a current licence from the supplier and approval from the appropriated divisional director.

Hardware Access

Access to the network shall be restricted to authorised devices only.

System Perimeter access (firewalls)

The boundary between business systems and the Internet shall be protected by firewalls, which shall be configured to meet the threat and continuously monitored.

All servers, computers, laptops, mobile phones and tablets shall have a firewall enabled, if such a firewall is available and accessible to the device's operating system.

The default password on all firewalls shall be changed to a new password that complies to the password requirements in this policy, and shall be changed regularly.

All firewalls shall be configured to block all incoming connections.

If a port is required to be opened for a valid business reason, the change shall be authorised by Greg Moore. The port shall be closed when there is no longer a business reason for it to remain open.

Monitoring System Access and Use

An audit trail of system access and data use by staff shall be maintained wherever practical and reviewed on a regular basis by the system administrator.

The business reserves the right to monitor and systems or communications activity where it suspects that there has been a breach of policy in accordance with the Regulation of Investigatory Powers Act (2000).

Asset Management

Asset Ownership

Each information asset, (hardware, software, application or data) shall have a named custodian who shall be responsible for the information security of that asset.

Asset Records and Management

An accurate record of business information assets, including source, ownership, modification and disposal shall be maintained.

All data shall be securely wiped from all hardware before disposal.

Asset Handling

Delphini shall identify particularly valuable or sensitive information assets through the use of data classification.

All staff are responsible for handling information assets in accordance with this security policy. Where possible the data classification shall be marked upon the asset itself.

All company information shall be categorised into one of the three categories in the table below based on the description and examples provided:

Category	Description	Example
Public	Information which is not confidential and can be made available publically through any channels.	<ul style="list-style-type: none"> • Details of products and services on the website • Published company information • Social media updates • Press releases
Amber Information	Information which, if lost or or made available to unauthorised persons could impact the company's effectiveness, benefit competitors or cause embarrassment to the organisation and/or its partners	<ul style="list-style-type: none"> • Company operating procedures and policy • Client contact details • Company plans and financial information • Basic employee information including personal data

Red Information	<p>Information which, if lost or made available to unauthorised persons, could cause severe impact on the company's ability to operate or cause significant reputational damage and distress to the organisation and/or its partners.</p> <p>This information requires the highest levels of protection of confidentiality, integrity and availability.</p>	<ul style="list-style-type: none"> • Client intellectual property • Data in e-commerce systems • Employee salary details • Any information defined as "sensitive personal data" under the Data Protection Act
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Removable media

Only company provided removable media (such as USB memory sticks and recordable CDs/DVDs) shall be used to store business data and its use shall be recorded (e.g. serial number, date, issued to, returned)

Removable media of all types that contain software or data from external sources, or that has been used on external equipment, require the approval of Greg Moore before they may be used on business systems. Such media must be scanned by anti-virus before being used.

Auto play functionality on all system PCs shall be disabled by means of group policies from the central sever.

Users breaching these requirements may be subject to disciplinary action.

Mobile working

Where necessary, staff may use company-supplied mobile devices such as phones, tablets and laptops to meet their job role requirements.

Use of mobile devices for business purposes (whether business-owned or personal devices) requires the approval of Greg Moore

Such devices must have anti-malware software installed (if available for the device), must have PIN, password or other authentication configured, must be encrypted (if available for the device) and be capable of being remotely wiped.

They must also comply with the software management requirements within this policy. Users must inform Greg Moore or a Company Director immediately if the device is lost or stolen and business information must then be remotely wiped from the device.

Personal devices / Bring Your Own Device (BYOD)

Where necessary, staff may use personal mobile phones to access business email. This usage must be authorised by Greg Moore.

The device must be registered in the asset records and must be configured to comply with the mobile working section and other relevant sections of this policy.

No other personal devices are to be used to access business information

Social Media

Social media may only be used for business purposes by using official business social media accounts with authorisation from Greg Moore. Users of business social media accounts shall be appropriately trained and be aware of the risks of sharing sensitive information via social media.

Business social media accounts shall be protected by strong passwords in-line with the password requirements for administrator accounts.

Users shall behave responsibly while using any social media whether for business or personal use, bearing in mind that they directly or indirectly represent the company. If in doubt, consult Greg Moore.

Users breaching this requirement may be subject to disciplinary action

Physical and Environmental Management

In order to minimise loss of, or damage to, all assets, equipment shall be physically protected from threats and environmental hazards. Physical security accreditation should be applied if necessary.

Systems shall be protected from power loss by UPS systems designed to support critical equipment.

Systems requiring particular environmental operating conditions shall be maintained within optimum requirements.

Computer and Network Management

Operations Management

Management of computers and networks shall be controlled through standard documented procedures that have been authorised by the board of directors.

System Change Control

Changes to information systems, applications or networks shall be reviewed and approved by Greg Moore

Accreditation

The organisation shall ensure that all new and modified information systems, applications and networks include security provisions to comply with policy.

They must be correctly sized, identify the security requirements, be compatible with existing systems according to an established systems architecture (as required) and be approved by Greg Moore before they commence operation. Implemented

Software Management

All application software, operating systems and firmware shall be updated on a regular basis to reduce the risk presented by security vulnerabilities.

All software security updates/patches shall be installed within 7 days of their release.

Only software which has a valid business reason for its use shall be installed on devices used for business purposes

Users shall not install software or other active code on the devices containing business information without permission from Greg Moore.

For the avoidance of doubt, all unnecessary and unused application software shall be removed from any devices used for business purposes.

Local Data Storage

Data stored on the business premises shall be backed up regularly and restores tested at appropriate intervals (at least monthly).

A backup copy shall be held in a different physical location to the business premises using an online backup service.

Backup copies of data shall be protected and comply with the requirements of this security policy and be afforded the same level of protection as live data.

External Cloud Services

Where data storage, applications or other services are provided by another business (e.g. a 'cloud provider') there must be independently audited, written confirmation that the provider uses data confidentiality, integrity and availability procedures which are the same as, or more comprehensive than those set out in this policy.

Protection from Malicious Software

The business shall use software countermeasures, including anti-malware, and management procedures to protect itself against the threat of malicious software.

All computers, servers, laptops, mobile phones and tablets shall have anti-malware software installed, where such anti-malware is available for the device's operating system

All anti-malware software shall be set to:

- scan files and data on the device on a daily basis
- scan files on-access
- automatically check for, and install, virus definitions and updates to the software itself on a daily basis
- block access to malicious websites

Vulnerability scanning

The business shall have a yearly vulnerability scan of all external IP addresses carried out by a suitable external company or Delphini's own IT engineers.

The business shall act on the recommendations following the vulnerability scan in order to reduce the security risk presented by any significant vulnerabilities
The results of the scan and any changes made shall be reflected in the company risk assessment and security policy as appropriate.

Response

Information security incidents

All breaches of this policy and all other information security incidents shall be reported to Greg Moore or a Company Director.

If required as a result of an incident, data will be isolated to facilitate forensic examination. This decision shall be made by the Managing Director.

Information security incidents shall be recorded in the Security Incident Log and investigated by Greg Moore to establish their cause and impact with a view to avoiding similar events. This policy shall be updated if required to reduce the risk of a similar incident re-occurring.

Business Continuity and Disaster Recovery Plans

The organisation shall ensure that business impact assessment, business continuity and disaster recovery plans are produced for all mission critical information, applications, systems and networks.

Reporting

Remi Abbott shall keep the business informed of the information security status of the organisation by means of regular reports to senior management.

Further Information

Further information and guidance on this policy can be obtained from Remi Abbott – Remi@delphini.co.uk Comments and suggestions to improve security are always welcome.

Policy approved by:



Signature
Dave Cormack
Managing Director
August 2023

2.18 Right to Work in the UK Policy

Purpose

The purpose of this procedure is to ensure that all personnel are aware of the eligibility requirements to work in the UK and in accordance to the Home Office Employer's Guide to right to work checks published on 6th April 2022-[An employer's guide to right to work checks \(publishing.service.gov.uk\)](https://www.gov.uk/government/publications/employer-guide-to-right-to-work-checks). This policy contains documented controls that complies with Sections 15 to 25 of the Immigration, Asylum and Nationality Act 2006.

Scope

This process shall be applied by all current personnel and any new person to be employed or hired.

Process

Delphini shall check that a job applicant is allowed to work for you in the UK before you employ them.

- Delphini shall see the applicant's original documents
- Delphini shall check that the documents are valid with the applicant present.
- Delphini will make and keep copies of the documents and record the date you made the check.

Delphini could face a civil penalty if you employ an illegal worker and haven't carried out a correct right to work check.

Delphini shall not discriminate against anyone because of their race.

Checking the documents

You need to check that:

- the documents are genuine, original and unchanged and belong to the person who has given them to you
- the dates for the applicant's right to work in the UK haven't expired
- photos are the same across all documents and look like the applicant
- dates of birth are the same across all documents
- the applicant has permission to do the type of work you're offering (including any limit on the number of hours they can work)
- for students you see evidence of their study and vacation times
- if 2 documents give different names, the applicant has supporting documents showing why they're different, eg a marriage certificate or divorce decree

A verification shall be carried out online via the Home Office website [View a job applicant's right to work details - GOV.UK \(www.gov.uk\)](https://www.gov.uk/view-a-job-applicant-s-right-to-work-details) and findings shall be recorded on the employee's application form.

In order to verify eligibility to work in the UK a person must produce a document which demonstrates they are either a national from a European Economic Area (EEA) country or Switzerland, or are a Non-EEA national who has acquired the right to work in the UK. Documents used to verify right to work are compliant with Home Office Comprehensive Guidance for Employers on Preventing Illegal Working and are retained for at least 2 years after an employee has left the company.

EEA Nationals

Nationals from all EEA countries, and Switzerland, will be required to produce a document showing their nationality. This will usually be either a national passport or national identity card. Some nationals from EEA countries may also produce a residence permit issued by the Home Office which confirms their right to reside and work here. You will need to produce one original document from

List A.

There are currently 31 countries in the European Economic Area (EEA):

Austria	Greece	Netherlands
Belgium	Iceland	Norway
Cyprus	Ireland	Portugal
Denmark	Italy	Spain
Finland	Liechtenstein	Sweden
France	Luxembourg	United Kingdom
Germany	Malta	Poland
Czech Republic	Latvia	Slovakia
Estonia	Lithuania	Slovenia
Hungary	Romania	Bulgaria

Croatia joined the EEA on 1 July 2013 however Croatian nationals have restricted working rights and may still require a certificate of sponsorship and/or a registration certificate depending on their circumstances.

Non-EEA Nationals

Nationals from non-EEA countries will be required to produce a document which demonstrates they have acquired the right to work in the UK. You will need to produce one original document from the List B.

In addition to checking documents before you start employment, we will also carry out a follow-up check at least once every 12 months to ensure that you remain eligible to continue working in the UK. This is a UK Border Agency requirement.

List B

Group 1 Documents where a time-limited statutory excuse lasts until the expiry date of leave

- A current passport endorsed to show that the holder is allowed to stay in the UK and is currently allowed to do the type of work in question.
- A current Biometric Immigration Document (Biometric Residence Permit) issued by the Home Office to the holder which indicates that the named person can currently stay in the UK and is allowed to do the work in question.
- A current Residence Card (including an Accession Residence Card or a Derivative Residence Card) issued by the Home Office to a non-European Economic Area national who is a family member of a national of a European Economic Area country or Switzerland or who has a derivative right of residence.
- A current Immigration Status Document containing a photograph issued by the Home Office to the holder with a valid endorsement indicating that the named person may stay in the UK, and is allowed to do the type of work in question, together with an official document giving the person's permanent National Insurance number and their name issued by a Government agency or a previous employer.

Group 2 Documents where a time-limited statutory excuse lasts for 6 months

- A Certificate of Application issued by the Home Office under regulation 17(3) or 18A(2) of the Immigration (European Economic Area) Regulations

2006 to a family member of a national of a European Economic Area country or Switzerland stating that the holder is permitted to take employment which is less than 6 months old together with a Positive Verification Notice from the Home Office Employer Checking Service.

- An Application Registration Card issued by the Home Office stating that the holder is permitted to take the employment in question, together with a Positive Verification Notice from the Home Office Employer Checking Service.

- 3.4 A Positive Verification Notice issued by the Home Office Employer Checking Service to the employer or prospective employer which indicates that the named person may stay in the UK and is permitted to do the work in question.

You can find out more about these documents and view images in the 'Full guide for employers on preventing illegal working in the UK' which can be downloaded from the website: www.ukba.homeoffice.gov.uk/business-sponsors/preventing-illegal-working/



Dave Cormack
Managing Director

August 2023

3.0 Organisation

Organisations need to define the responsibilities and relationships, which promote a positive safety culture, and secure implementation and continued development of the safety policy. Structures and processes are required to:

Establish and maintain management control within an organisation;

Promote co-operation between individuals and groups so that safety becomes a collaborative effort;

Ensure the communication of necessary information throughout the organisation;

Secure the competence of employees.

Delphini Ltd maintains control of its business by;

- Obtaining the commitment of its employees
- Allocation of safety responsibilities to all employees
- Sufficiently resourcing the organisation to manage safety
- The setting of standards for performance
- Monitoring performance, by inspections and audit
- Investigating incidents and implementing improvements to prevent recurrence

3.1 Control

The Board has the ultimate responsibility for the safety of its undertaking. At each Board meeting safety is discussed as a separate agenda item.

Delphini Ltd operates a safety committee specifically to assist the Board in discharging its responsibilities. It does this by monitoring and co-coordinating all safety issues affecting its undertaking and liaising with management organisation.

The safety committee composition will ensure that each part of the organisation is sufficiently represented.

The full committee will meet at least 6 monthly and it will be chaired by the Managing Director. Sub-committee meetings will also be conducted, in-between the full committee meetings.

The Managing Director has overall management responsibility and is ultimately accountable for the safety within Delphini Ltd. The Managing Director of Delphini Ltd has delegated the responsibility for implementation to the Operations Director.

The flow chart (Figure 1) details the functional safety management within Delphini Ltd, with specific relation to its own employees, agency personnel, sub-contractors and visitors.

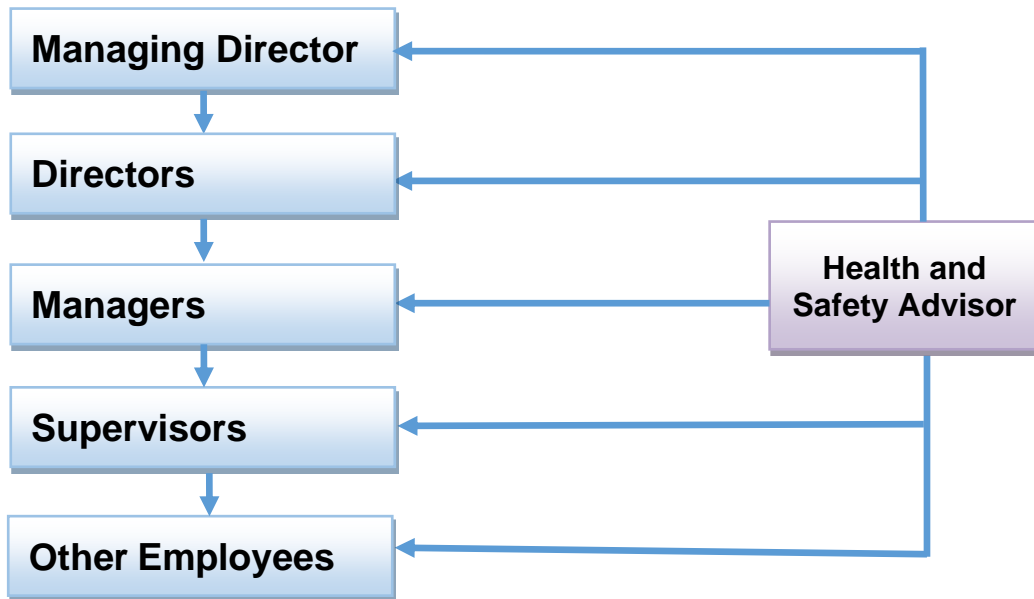


Figure 1: Management Flow Chart

3.2 Co-operation and Communication

Delphini Ltd employees can and are encouraged to report any near misses, incidents or concerns they have on safety whilst in any Delphini Ltd premises or when on site and when out on company business to their Line Manager for appropriate action. Any resulting action from such reports will be fed back to the originator of the report.

Delphini Ltd employees will be notified when policies and procedures have been produced or updated, and where necessary they will be provided with any training that may be required.

Further internal communication takes place in relation to safety matters in the form of;

- Team briefings, site safety forums and toolbox talk type sessions
- Safety Bulletins
- Dedicated and managed safety notice boards.

Safety information comes into the organisation from a number of sources, including;

- Health and Safety Executive (HSE)
- Health and safety publications
- Competent health and safety advisor
- Attending relevant conferences and seminars.

3.3 Competence

There is an ongoing requirement for safety related training for Delphini Ltd employees to be undertaken. The responsible line manager will ensure that an induction for all new Delphini Ltd employees is undertaken and subsequently recorded; this induction will include relevant health and safety information and arrangements. The safety training plans for individuals will be developed via a training/skills matrix which is produced by the Delphini Ltd in conjunction with the Health and Safety Advisor and the employee's line manager.

4.0 Planning and Implementation

Planning is essential for the implementation of safety policy and procedures. All members of the organisation can only achieve adequate control of risks through co-ordinated action. An effective planning system for safety requires organisations to establish and operate a safety management system which:

- Controls risks by;
- Reacting to changing demands;
- Assisting in developing and sustaining a positive safety culture

Delphini Ltd will compile a safety plan and/or objectives on an annual basis, with the implementation being delegated to relevant individuals. The progress of the plan and/or objectives is monitored and is discussed at the monthly senior management meetings.

5.0 Measuring Performance

Measurement is essential to maintain and improve safety performance. There are two ways to generate information on performance:

1. Active systems, which monitor the achievement of plans and the extent of compliance with policy and safety procedures;
2. Reactive systems which monitor accidents, ill health and incidents;

Effective procedures are needed to capture both sorts of information. Delphini Ltd monitors safety performance in a number of ways;

Proactive;

- Office, workshop and site safety inspections
- Work equipment inspections
- Means of escape inspections
- Audit of policy compliance

Reactive;

- Following up reports of dangerous occurrences
- Accident and incident statistics
- Incident/accident investigation
- Near miss reporting

Regular reports on employee matters including any safety issues are presented to Health and Safety Committee meeting and reviewed with actions being allocated if and when necessary to rectify any shortcomings identified.

Performance against safety responsibilities identified in Appendix 1, these are reviewed on a regular basis (within performance review) between the jobholder and line manager and corrective action taken if necessary. Performance objectives are updated annually, which may include a safety related objective.

6.0 Audit and Review

Organisations can maintain and improve their ability to manage risks by learning from experience through the use of audits and performance reviews. The audit provides a systematic and independent check of compliance with the system and can also provide a comparison with “best practice”.

Delphini Ltd will undertake an independent audit (at least annual) of its performance against its policy on a regular basis and instigate appropriate actions against recommendations.

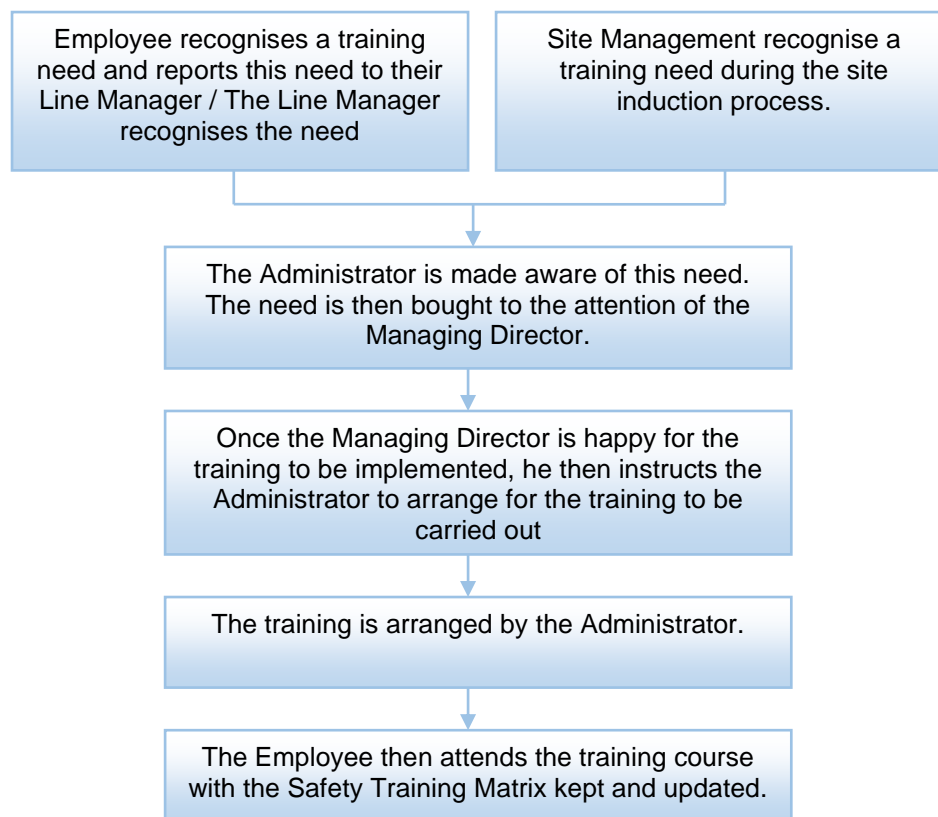
This policy will also be reviewed to take into consideration the findings of relevant audits, relevant changes in legislation, and relevant changes within the business organisation or any other circumstances that would suggest review is required.

7.0 Roles and Responsibilities

Individual safety responsibilities are detailed within Appendix 1.

8.0 Training

Delphini Ltd monitors the competency of its staff regularly to highlight any training needs. Below is the process for the identification of a training need and the subsequent implementation of this training.



9.0 Arrangements

Details of the arrangements that allow for implementation and management of safe working practices are detailed within Part 2 of the Delphini Health & Safety Policy.

10.0 Appendices

1 Employee Safety Responsibilities

The following details individual responsibilities in Health & Safety (H&S) matters, insofar as they are applicable to the role.

1a Managing Director

- a) Provide positive leadership for Delphini Ltd on H&S issues.
- b) Promote an enthusiastic H&S culture that delivers positive commitment to, and engages all employees in, continuous improvement in H&S performance.
- c) Ensure that personal contributions to Board decisions take proper account of H&S policy commitments.
- d) Champion H&S risk management issues at Board level and have overall line management responsibility for the H&S management system.
- e) Authorise the Delphini Ltd H&S Policy Statements.
- f) Recommend to the Board the appointment of a corporate director to have overall responsibility for leadership of the H&S function.
- g) To ensure that sufficient resources are made available for implementation and management of H&S with Delphini Ltd.

1b Directors

- a) Provide individual and collective leadership for Delphini Ltd on H&S issues.
- b) Promote an enthusiastic H&S culture that delivers positive commitment to and engages all employees in continuous improvement in H&S performance.
- c) Ensure their personal contributions to Board decisions take proper account of H&S policy commitments.
- d) Ensure implementation of Delphini Ltd H&S policy, plans and objectives in their areas of responsibility.
- e) Review H&S performance by receiving and considering H&S reports to the Board.

1c Managers

- a) Provide positive leadership on H&S issues within your area of operation.
- b) Promote an enthusiastic H&S culture that delivers positive commitment to and engages all employees in continuous improvement in H&S performance.
- c) Monitor those personnel under their control comply with their individual responsibilities in H&S matters.
- d) Give personnel under their control, including contractors, clear instructions as to their responsibilities to ensure correct working methods.
- e) Make adequate provision for dealing with Health and Safety emergencies.
- f) Assist with the identification of H&S training needs, and monitor delivery and recording.
- g) Review accident and incident reports, identify any trends and ensure that there is an appropriate response to prevent future occurrence.
- h) Promptly alert line management to significant accidents and incidents. Where appropriate be involved in the investigation and ensure that findings are reported.
- i) Promptly alert line and H&S management to:
 - i. significant injury to employees or those working under our control
 - ii. reportable dangerous occurrences
 - iii. incidents that could lead to enforcement action
 - iv. enforcement notices served
 - v. injury to a member of the public or a visitor
 - vi. near miss incidents

1d Supervisors / Co-ordinators

- a) Provide positive leadership on H&S issues for the members of the work team for which they are responsible, including sub-contractors.
- b) Promote a positive attitude in the workforce and encourage behaviours that protect both people and the environment.
- c) Completion of suitable and sufficient risk assessments
- d) Organise work to be carried out in accordance with relevant H&S risk assessments/method statements.
- e) Monitor those personnel under their control comply with their individual responsibilities in H&S matters.

- f) Give personnel under their control, including sub-contractors, clear instructions about the required methods of work.
- g) Where appropriate assess and implement any additional H&S controls required to address the needs of new employees, young persons, non-English speaking workers, disabled persons, pregnant women, etc.
- h) Ensure appropriate arrangements are in place for two-way communication and where appropriate deliver toolbox talks to the work teams.
- i) Identify any H&S training requirements of personnel under their control and advise appropriate management accordingly.
- j) See that accidents and incidents are reported immediately to the relevant manager.
- k) Ensure that personal protective clothing and equipment is used where identified as required and is properly maintained and stored.
- l) Ensure that the plant and equipment supplied is appropriate for the work and has any necessary certification. Ensure that plant and equipment is immediately put out of use if unsafe or presents a potential threat to the environment and records are kept and maintained in relation to its condition.
- m) Ensure that only authorised persons operate plant and equipment.
- n) Ensure that the disciplinary process for breaches of H&S procedures and rules is applied where necessary.
- o) Ensure that suitable and sufficient records are kept and maintained with regard to attendance and hours worked of Delphini Ltd Management, Supervisors, Operatives and Sub Contractors.

1e Other Employees

- a) Set a good personal example on H&S issues within your area of operation.
- b) Take care of your own health and safety whilst at work; ensure your activities do not adversely affect the health and safety of others or damage the environment.
- c) Co-operate with the company in all matters of Health & Safety protection and make your contribution to reducing accidents and conserving natural resources.
- d) Ensure you have been fully briefed on, and have a good understanding of, the task at hand. Always work in accordance with the instructions given and any written H&S risk assessments/method statements. Report any conflict.

- e) Never deviate from an agreed method of working unless the supervisor or relevant manager has been notified and authorisation has been obtained.
- f) Ensure that you have and use the correct access, tools, equipment and personal protective for the work.
- g) Ensure that before any work is undertaken, check that the area of work is free from hazards and that you are aware of the surroundings, and that nothing has changed that would have an effect on the original safe system of work.
- h) Never undertake hazardous operations nor operate any items of plant or equipment unless trained and authorised to do so.
- i) Maintain a tidy workplace with an appropriate level of cleanliness.
- j) Report to immediate supervisor any defects in plant or equipment or unsafe methods of work and ensure that plant, equipment and premises are left in a safe and secure state and place when unattended. Do not operate any item of plant or equipment that has become defective.
- k) Report to your immediate supervisor all potential hazards and incidents that have or could have resulted in personal injury or damage.
- l) Report any work-related personal injury or disease to your immediate supervisor and ensure that an entry is made in the accident book at your place of work.
- m) If you are asked to undertake a task that you feel is unsafe or for which you feel you do not have the appropriate knowledge or training, report this to your immediate supervisor.

1f Health and Safety Advisor

- a) Provide positive leadership for Delphini Ltd on H&S issues and promote the adoption of the H&S best practice.
- b) Monitor the effectiveness of the H&S management system and make recommendations for improvement as appropriate.
- c) Provide assistance and advice to all Delphini Ltd employees.
- d) Recommend annual H&S objectives. Monitor and report on the implementation of the approved objectives.
- e) Produce reports on H&S performance.
- f) Ensure that there are appropriate processes in place for promptly alerting the business to significant accidents and incidents. Where appropriate, be involved in the investigation and ensure that the findings are reported.

- g) Review accident and incident reports and investigation reports, identify any trends and ensure that there is an appropriate response to prevent future recurrence.

1g Managers with Specific Responsibilities for Recruitment*

- a) Ensure that arrangements exist to deliver the following:
- all potential recruits receive pre-employment questionnaires which address all relevant H&S issues
 - on appointment, an appropriate H&S induction is given to all employees
 - employees are issued with the H&S policy together with their individual responsibilities under the H&S policy
 - managers and supervisors are issued with the responsibilities under the H&S policy of all staff for whom they have responsibility

* These responsibilities are specific to this role and are in addition to the other relevant responsibilities contained in this document.

1h Managers with Specific Responsibilities for Procurement*

- a) Ensure that arrangements exist to deliver the following:
- orders to suppliers for materials, plant and equipment etc. include relevant H&S requirements notified by the specifier
 - suppliers of materials, plant and equipment etc. are requested to provide all necessary information and operating instructions so that their products can be used safely without risk to persons or the environment
 - where such information is received by the procurer that it is passed on to the persons who will use the materials, plant and equipment etc.
 - orders to suppliers for personnel include sufficient detail to adequately describe the work for which they are required
 - contractors and Labour Agencies are assessed as competent and adequately resourced for the work before contracts are placed
 - tendering contractors have been provided with the Standard Rules for Sub-Contractors on Safety, Health and the Environment and that compliance with them is a condition of contract
 - no undertakings, either verbal or written, are given to any supplier relieving it of its H&S responsibility
- b) Monitor that the above arrangements are effectively implemented.

***Notes**

- Procurement includes those individuals managing the procurement of personnel
- These responsibilities are specific to this role and are in addition to the other relevant responsibilities contained in this document

1i Managers/Supervisors with Specific Responsibilities for Installation*

- a) Ensure that arrangements exist to deliver the following:
 - all plant and equipment is in a safe condition and that relevant, current inspection/thorough examination certificates are available for the relevant item of plant or equipment
 - plant and equipment hired in is from an approved supplier and has current inspection/thorough examination certificates available with it
 - inspection, planned preventative maintenance and periodic tests and thorough examinations are carried out and that results are recorded
 - repairs and maintenance are carried out in a proper manner by competent personnel
 - all plant and equipment defects notified are remedied and plant and equipment is immediately put out of service if it is unsafe or a risk to the environment.
- b) Monitor that the above arrangements are effectively implemented.

* These responsibilities are specific to this role and are in addition to the other relevant responsibilities contained in this document.

1j First Aiders

- a) To respond quickly and calmly to First Aid incident calls and to assess casualties with care and administer limited First Aid treatment referring casualties to hospital, a G.P. or to work, according to the seriousness of the condition.
- b) To remain with casualties until transfer to qualified medical personnel has taken place as appropriate.
- c) To refer and report on all casualties transferred to hospital or a G.P. to the relevant manager/supervisor, and refer all injury and accident incidents to their manager/supervisor.
- d) To be responsible for First Aid boxes and replenish stock levels as required.
- e) To maintain an up-to-date knowledge of First Aid practices and procedures as is practical.

1j Fire Wardens

- a) To respond quickly and calmly to Fire Alarm Drills and Tests.
- b) To maintain an up-to-date knowledge of Fire Warden procedures
- c) Attend / complete net based training updates as required to ensure Fire Warden competence

- d) Attend regular training for competence on fire extinguishers and fire equipment if required.

2 Employee Safety Responsibilities Matrix

Policy Reference	Job Title
Managing Director	Managing Director
Directors	Finance Director
Managers	Stores Manager Operations Manager General Manager (Health & Safety)
Supervisors	Gear Store Supervisor Engineering Co-ordinator Lead Site Engineer Engineering Sales Supervisor
Other Employees	Finance Assistant Accounts Administrator Gear Store Operatives Manufacturing Engineers Site Engineers Administration Assistant

3 Responsibilities for Product Safety

Managing Director

- Issuing of Design Drawings, Calculations, Revisions, Certificates of Conformity, Mill Certificates, Certification of Delphini Manufactured Products as required by EN1090 & the Lifting Operations and Lifting Equipment Regulations (LOLER)
- Signing of Test Certification, Certificates of Conformity, or Examination reports for any Lifting or Safety products, either purchased or manufactured.

General Manager

- Reviewing purchased items for inspection and sign off of products under Lifting Operations and Lifting Equipment Regulations (LOLER)
- Internal auditing of the Quality Management System
- Responsible for all site and workshop calibrated equipment.
- Reviewing Certificates of Conformity for site equipment.
- Signing of Test Certification, Certificates of Conformity, or Examination reports for any Lifting or Safety products, either purchased or manufactured.

Operations Manager

- a) Issuing of documentation for works whereby compliance with EN1090 is required
- b) Reviewing in-house manufactured products in preparation for final sign-off
- c) Internal auditing of Factory Process Controls (FPC) as the Responsible Welding Co-Ordinator (RWC) in accordance with EN1090.
- d) Reviewing of purchased steelwork for works whereby compliance with EN1090 is required.

Gear Store Supervisor

- a) Reviewing purchased items for inspection and sign off of products under Lifting Operations and Lifting Equipment Regulations (LOLER)
- b) Reviewing and inspection of Personal Protective Equipment (PPE) products.
- c) Signing of Test Certification, Certificates of Conformity, or Examination reports for any Lifting or Safety products, either purchased or manufactured.