



Policies



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Environmental Policy

Devcon Limited is committed to caring for and protecting the environment in which we operate by pursuing a responsible and proactive attitude to improving environmental performance across all our business activities. We will always endeavour to balance our business aims with environmental considerations and will encourage our business partners and members of the wider community to join us in this effort.

Devcon Limited is committed to complying with, and where possible exceeding, the legal and other requirements to which we subscribe in relation to environmental aspects of the business.

Specifically, where it is within our control or influence in design, planning, construction, and operational management, Devcon Limited undertakes to:

- Assess and minimise any negative environmental impacts and maximise any positive impacts of its operations.
- Develop management processes and operational procedures to prevent pollution.
- Reduce the effects of noise, dust, light, disturbance, and inconvenience.
- Make efficient use of energy and water resources and reduce our carbon footprint.
- Make efficient use of natural resources and promote the use of sustainable materials.
- Reduce waste production and divert waste away from landfill by promoting resource efficiency, recycling, and the use of recycled and recyclable materials.
- Protect and, where appropriate, enhance biodiversity.
- Develop and maintain emergency procedures to deal with any significant environmental hazards or incidents that may arise because of its activities.
- Engage with clients, subcontractors, and suppliers to reduce the environmental impact of projects, increase knowledge, and improve environmental performance.

All employees, irrespective of whether they are full or part-time, temporary or permanent and all subcontractors or other persons working on our behalf are expected to cooperate with Devcon Limited in the implementation of this environmental policy document and to ensure that their own work so far as is reasonably practicable, is carried out with minimum risk to the environment.

We will conduct an annual review of the effectiveness of this environmental policy and its associated procedures, measurement methods, objectives and targets and update the policy as appropriate.

This policy statement will be prominently displayed at all workplaces and made available to the public and other interested parties upon request.

A handwritten signature in black ink, appearing to read "L N Pope".

L N Pope
Managing Director
16 May 2023



Health and Safety Policy

The purpose of this document is to provide evidence that requirements under the health and safety policy, as required by section 2 (3) of the health and safety at work act 1974 (and any amended documents), are being adhered to. The general policy of this document is to safeguard the health, safety, and welfare of all employees of Devcon Limited while at work, and to provide, as far as reasonably practical, working environments which are safe and without health risks. Additionally, to confirm that Devcon Limited conducts its undertakings in such a manner to ensure so far as reasonably practical working environments which are safe and without health risks. To also recognise Devcon Limited's obligation to meet all relevant legislative requirements about health and safety, which apply to any company undertakings. Finally, to recognise and arrange its affairs to ensure compliance with the policy.

General Statement

The employees' health, safety, and welfare are of fundamental importance to Devcon Limited (from now on referred to as 'the company'). They are essential to the efficient operation of its undertakings. The company will provide safe and healthy working conditions for employees and ensure that their work does not endanger anyone else. The responsibility for health and safety at work rests upon all management areas. The company will ensure that this policy is followed throughout the organisation. The company will take all reasonably practicable precautions to ensure the health, safety and welfare of its employees by providing the following:

- A safe working environment by design, construction, operation and maintenance of all plant equipment and facilities.
- Safe systems of work.
- Adequate instruction, information, training and supervision.
- Control of all situations likely to cause damage to property and equipment.
- Control of all activities which may hurt the environment.
- Adequate facilities for the treatment of injuries that occur at work.
- Acceptable means and facilities for consultation between management and employees.

Individual Responsibilities

Managing Director/Principle

For the purposes of this document, the principle describes the person in overall control of the company.

- The managing director/principal has overall responsibility for the health and safety responsibilities of the company. He is responsible for ensuring that the health and safety policy is implemented, effective, and kept up to date.
- He is responsible for setting a personal example to all other staff members by ensuring that whilst visiting sites, he wears the correct protective clothing and adheres to the individual requirements involving access to equipment and the handling of tools etc.
- He should be familiar with reporting accidents and dangerous occurrences as defined by the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 and, as necessary, ensure such events are submitted to HSE.
- He must also ensure that medical and emergency arrangements and fire precautions are implemented on all sites.

Site Managers and Foremen

- Ensure that all staff are adequately trained in the use of equipment which will be operated by them and prevent untrained staff from carrying out tasks for which they are not trained.
- By regular inspection, be sure that all machinery, access equipment, hazardous substances, and materials are adequately stored, serviced and secured to ensure the safety of employees and other personnel.
- Being aware and making others aware of safe access and egress from the site and always ensuring that such passage/area is kept clear and free from obstructions in an emergency.
- Making sure, where applicable, that precautionary fire equipment is stored, serviced and in an accessible area and is

fully trained in its use together with at least one other employee on site.

- Report all accidents, no matter how minor and ensure they are correctly recorded.
- Make sure that all staff under his supervision wear the required safety equipment and make proper use of safety equipment.
- Managing Activities with Risks to Health Register, collecting Risk Assessments from sub-contractors, and ensuring that these are followed.

Employees and Operatives

- Must cooperate with management to do all in their power to prevent accidents to themselves and others as required by health and safety legislation.
- Only undertake a task for which they have been adequately trained, and do not ask another staff member to do the same.
- Wear protective clothing as required by each task and ensure it is not worn or damaged.
- Be proactive in suggesting ways to improve conditions and point out hazards to management and other employees.
- Immediately report to a supervisor any accidents sustained whilst working, and follow the supervisor's instructions in treating the injury.

All Employees

All employees must comply with health and safety legislation regardless of their position or job title. They must make themselves aware of the requirements of health and safety legislation and use their very best endeavours to ensure that the health and safety of themselves and all others are at all times protected, and where necessary, take appropriate steps to correct any inconsistencies and report any misdemeanours to supervising staff or staff members directly responsible for the health and safety of the company.

It should be clearly understood that whilst an employee may delegate a duty (e.g., maintaining records), he remains responsible for ensuring that it is carried out to enable this policy to be fully effective. The support of all employees is essential.

Subcontractors

All Subcontractors will be required to:

- Comply with the Health & Safety at Work Act 1994, COSHH Regulations and the Construction Health, Safety & Welfare Regulations 1996, and other relevant regulations issued about the Works and execution thereof. COSHH assessments of all materials supplied by the Sub Contractor will be provided to the Company's Contracts Manager and the Sub Contractors Safety Policy and Method Statement.
- Have particular regard for other persons who may work on or visit the site and those who live or pass near the site, whose health and safety may be affected by the operations.
- Ensure that their employees engaged in the works are provided with a safe workplace, safe plant and equipment and that they are instructed on a secure working system, including wearing protective headgear in high-risk areas.
- Provide all personal protective equipment as necessary for each of their employees and ensure that said equipment is utilised as required.
- Deal immediately with any matters the Company's Safety Representatives raised during their regular inspections.
- Ensure that all their plant operators are trained and competent in the use of the plant that they are to operate. All registers must be completed as necessary to comply with current Health and Safety legislation, and all drivers must hold currently approved certifications.
- Promptly report in writing all accidents suffered by any of their employees which occur on-site to the Companies Site Management, and if any of their employees shall be absent from work for more than three days as a result of any site accident, shall submit Form 2508 (or the appropriate form used at the time) to the Factory Inspection and deliver a copy to the Company's Site Management.
- Report immediately to the Site Manager if an Improvement Notice or a Prohibition Notice is issued by H M Factory Inspection under the Health & Safety at Work Act, etc., concerning any work or equipment on the site.
- Ensure that new entrants to the industry receive proper instructions and that all employees are trained with health

and safety at work in mind.

- Where use is made of erected scaffolding, not make alterations or adjustments.
- Ensure that all PPE, including safety helmets, safety boots, gloves, and high visibility jackets, are supplied to their staff and worn at all times unless otherwise instructed by the site manager.

Arrangements

Information, Instruction And Training

- The company will provide all training as required to each staff member and, until such training has been given, will only expect staff members to carry out duties they have been trained to undertake.
- Ensure that all technical instruction relating to mechanical and electrical equipment is made available to and read by employees required to work on such equipment.
- Adequately service, clean and test mechanical and electrical equipment to ensure the safety of the operatives.
- Review the ongoing training needs of staff.

Fire Precautions

- Where necessary, ensure that adequate fire safety equipment is on-site and tested annually.
- Train staff in adequately handling such equipment in the event of a fire.
- Clear all flammable materials from working areas where localised hot works are undertaken before starting work.

Health and Welfare Facilities

- Where necessary, ensure that adequate welfare facilities are made available and that such facilities are kept clean and free from obstruction.

First Aid

- Ensure that the company nominates a trained person to deal with all incidents and that they adequately report and record them in an accident book.

Protective Clothing and Equipment

- The company ensure that protective clothing and equipment are worn and personnel are correctly protected to carry out their work before starting.
- All safety equipment authorised to be used by the company and its Subcontractors will comply with British Safety Standards.

Control of Substances Hazardous to Health (COSHH)

- The company undertakes to ensure that all substances are correctly labelled, noting the material, the hazard, and the correct use of the substance.
- Training will be provided to all staff required to use hazardous substances to carry out their daily duties.

Noise

- Warning notices will be displayed to inform employees affected by high noise levels that they must wear suitable ear protection.
- The requirements of the Noise at Work regulations will be adhered to.

Records

- At each workplace, staff will be aware of the location of registers for keeping statutory records.

Safe Working Methods

Risk Assessments

Risk assessments are undertaken for each contract to reduce the risk of injury or illness in the workplace to a minimum. Employees who undertake the tasks will read and understand these assessments. The employees must comply with the control measures in the risk assessment, as failure to do so could result in disciplinary action.

Safety Signage

All work will be undertaken according to Health and Safety requirements, including displaying appropriate signs where there is a risk to employees and the general public.

Asbestos

The company recognises that some work will uncover asbestos-based materials. Under these circumstances, they will take every precaution to ensure that the work being undertaken is ceased immediately and that the appropriate persons are notified of the presence of dangerous material. Further work will not resume until the materials have been removed or made safe by encapsulation, as recommended by qualified engineers.

Roof Access/Working

All works at roof height will be undertaken with safety equipment to prevent falling. If there is no safety handrail in position, a harness will always be used. Information regarding safe working on roofs will be provided, and if necessary, the company will advise the employer of Health and Safety requirements before attending. Lone roof working is not permitted.

Scaffolding

Where work cannot be undertaken from the ground safely by ladder, it is essential to ensure that the company informs the employer (Client) of the need to scaffold.

Scaffolding should be erected to provide a suitable working platform from which a job can be completed safely. Working platforms must be appropriately constructed and offers adequate space for the operative, his tools and materials.

If the company provides its scaffolding, a complete method statement will be made available on the erection and operation of such equipment before the erection is undertaken.

If the company does not provide its scaffolding, it will ensure that the supplier will prove that they are competent to deliver, erect and dismantle such equipment without any hazard to the health and safety of the company's employees or the general public.

The company confirms that all staff are adequately trained for platform working and will, at all times, secure themselves to the equipment with safety harnesses and wear hard hats, all of which will be supplied under the Protective Clothing and Equipment section of this policy.

Ladders

Work undertaken from ladders should be at most the height of 2 meters without handrail support. Where a ladder is the best form of access, the following safety provisions will be undertaken.

- The foot of the ladder will be supported on a firm surface and not rest on loose material or equipment.
- Ladders will not be pitched at a greater angle than 1:4.
- The ladder's base will always have warning notices to warn passing pedestrians.
- The top of the ladder shall be securely fixed to the structure so that it will not slip whilst the ladder is being secured; the base will be held secure by another.
- It is necessary to ensure that the correct type of ladder is used and that employees know the different functions of varying ladder grades.
- All ladders will be checked every six months to ensure they are in good condition. Damaged ladders or ladders with missing rungs must not be used.
- The top of the ladder must always rest against a firm surface.
- Heavy items should not be carried up a ladder access for such loads must be made separately.
- Where stepladders are being used, the top platform must not be used unless there are appropriate handles.

Drilling, Sawing and Sanding

Works involving the creation of dust or material particles will only be undertaken using appropriate dust masks, ear protectors and goggles. They will not be undertaken in confined areas but in well-ventilated, well-lit spaces.

Mechanical and Electrical Equipment

All equipment requiring connection to an electrical supply will be checked annually for safe working, and certificates of inspection will be available upon request. In addition, the company confirms that:

- Circuit breakers will be used at all times.
- Portable electrical equipment will not be used without an RCD.
- Cutting blades of all types will be properly sharpened and set correctly in the equipment.
- Non-compatible items should not be married.
- Guards will be used on disk-cutting tools and secured to a bench or desk if the manufacturer requires them.
- Machining that causes sparks will only be undertaken in an area free from oil, dust, and waste material which may easily ignite.
- All tools will be correctly cleaned, oiled at the end of use and stored securely.

Non-Mechanical Plant and Equipment

The company undertakes to ensure that all non-mechanical plant and equipment are adequately checked to ensure it is in good condition and is stored safely at the end of the working day in a secure place. This includes handheld tools such as saws, screwdrivers, etc.

Method Statements

To comply with the Health and Safety at work act 1974 s2 (2a-e), contractors must produce and work to a comprehensive written 'method of work' statement. A copy of the method statement must be held where works are undertaken and retained for future reference. It should be made available for inspection before or after completing the work. If at any time during the execution of the task it is found that it is necessary to deviate from the prepared and agreed-on method statement, information must be made available immediately before the task is continued, and agreement by either the Safety Advisor, employer/client or his agents obtained.

The company expects employees to conform to this policy, comply with the relevant sections of the health and safety at work act 1974 and exercise all reasonable care for their health and safety and that of others who may be affected by their actions and omissions.

As such, a copy of this document has been and will continue to be provided to employees.

The policy will be kept up to date, particularly as the legislation changes and in line with any changes to the company's size or nature.



L N Pope
Managing Director
16 May 2023

Health and Safety Individual Responsibilities

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It should be clearly understood that whilst an employee may delegate a duty (e.g., maintaining records), he remains responsible for ensuring that it is carried out to enable this policy to be fully effective. The support of all employees is essential.

Subcontractors

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- Have particular regard for other persons who may work on or visit the site and those who live or pass near the site, whose health and safety may be affected by the operations.
- Ensure that their employees engaged in the works are provided with a safe workplace, safe plant and equipment and that they are instructed on a secure working system, including wearing protective headgear in high-risk areas.
- Provide all personal protective equipment as necessary for each of their employees and ensure that said equipment is utilised as required.
- Deal immediately with any matters the Company's Safety Representatives raised during their regular inspections.
- Ensure that all their plant operators are trained and competent in the use of the plant that they are to operate. All registers must be completed as necessary to comply with current Health and Safety legislation, and all drivers must hold currently approved certifications.
- Promptly report in writing all accidents suffered by any of their employees which occur on-site to the Companies Site Management, and if any of their employees shall be absent from work for more than three days as a result of any site accident, shall submit Form 2508 (or the appropriate form used at the time) to the Factory Inspection and deliver a copy to the Company's Site Management.
- Report immediately to the Site Manager if an Improvement Notice or a Prohibition Notice is issued by H M Factory Inspection under the Health & Safety at Work Act, etc., concerning any work or equipment on the site.
- Ensure that new entrants to the industry receive proper instructions and that all employees are trained with health and safety at work in mind.
- Where use is made of erected scaffolding, not make alterations or adjustments.
- Ensure that all PPE, including safety helmets, safety boots, gloves, and high visibility jackets, are supplied to their staff and worn at all times unless otherwise instructed by the site manager.



L N Pope

Managing Director

16 May 2023



Anti-Slavery and Human Trafficking Policy

Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. Devcon Limited has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners.

This policy applies to all persons working for Devcon Limited or on its behalf in any capacity, including employees at all levels, directors, employees, agency workers, placements, contractors, external consultants, third-party representatives and business partners.

Responsibility For the Policy

- The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- Management at all levels is responsible for ensuring those reporting to them understand and comply with this policy and are given training on it and the issue of modern slavery in supply chains.
- You are invited to comment on this policy and suggest ways to improve it. Comments, suggestions, and queries are encouraged and should be addressed to your line manager.

Compliance With the Policy

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

- The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.
- You are required to avoid any activity that might lead to or suggest a breach of this policy.
- You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.
- You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager through our Whistleblowing Policy as soon as possible. You should note that where appropriate and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive, and exploitative work practices in their own business and supply chains.
- If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager.
- We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they are mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or any of our supply chains.
- Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe you have suffered any such treatment, you should inform your Director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

Communication and Awareness Of This Policy

- Training on this policy and the risk our business faces from modern slavery in its supply chains form part of the induction process for all individuals who work for us. Managers are responsible for communicating this policy.
- Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate after that.
- Breaches of this policy
- Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.
- We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

A handwritten signature in black ink, appearing to read 'L N Pope', written over a horizontal line.

L N Pope
Managing Director
16 May 2023

Quality Management Policy

- To establish and maintain a Quality Management System which satisfies the requirements of Client specific quality requirements.
- To consistently provide products and services that will satisfy Client requirements in all respects.
- To implement appropriate actions to address any risks and opportunities associated with internal/external issues and to meet the needs and expectations of interested parties.
- Ensure all Company personnel are fully competent to carry out their assigned task.
- To continually improve our services provided to clients through this Quality Policy, quality objectives, and performance evaluations, including audit results, corrective actions and at Management Review.
- To establish annual quality objectives within the company at strategic and operational levels that will be measured and reported upon at the management review meeting.
- To control and continually monitor all projects undertaken.
- To comply, as a minimum, with all applicable statutory and regulatory requirements.
- Review the Quality management system at planned intervals to ensure it is effective and achieves the stated quality policy.

The Directors are fully committed to the above and actively encourage a similar commitment by personnel at all levels of the Company.

This Quality Policy is evaluated as part of the overall review of the Quality Management System to establish that its stated objectives are met.

A handwritten signature in black ink, appearing to read "L N Pope", with a horizontal line underneath.

L N Pope
Managing Director
16 May 2023

Quality Management System

Each project is assigned a new file. This file contains all relevant documents relating to the project for quality assurance purposes including:

- Copies of priced tender documents and/or official confirmation of order
- Copies of the Employers Instructions
- Copies of Contract Documents
- Copy of Planning Permission
- Copy of Planning Conditions Tracker
- Copy of S106 agreement highlighting any project related obligations
- Copies of drawings together with issue sheet numbers to show latest revisions
- Copies of specific schedules such as kitchens, doors, ironmongery, colours, flooring together with issue sheet numbers to show latest revisions
- Copies of health and safety Pre-Tender Construction Plan
- Copies of asbestos report category level 3 confirming appropriate action to be taken
- Copies of health & safety Construction Phase Plan, including risk assessments & method statements
- Copies of Safety Services UK site visit inspection reports
- Copies of programmes and any on-going revisions
- Copies of all correspondence be it posted or via e.mail
- Copies of sub-contract orders including pre-order minutes.
- Copies of site meeting minutes
- Copies of Building Control Certificates including plan consent number and contact name
- Copies of Employers Instructions
- Copies of valuations together with Interim Payment Certificates issued on behalf of client
- Copies of Practical Completion certificates
- Record of retentions and dates for release
- Summaries of feedback and evaluation reports
- Copies of any issues or complaints that arose during the project process, and the recommendations taken

A handwritten signature in black ink, appearing to read "L N Pope", with a horizontal line underneath.

L N Pope

Managing Director

16 May 2023

Data Protection Policy

Context and Overview

Introduction

Devcon Limited needs to gather and use certain information about individuals. These can include clients, sub-contractors, suppliers, business contacts, employees and other people the organisation has a relationship with or may need to contact. This policy describes how this personal data must be collected, handled and stored to meet the company's data protection standards — and to comply with the law.

Why This Policy Exists

This data protection policy ensures Devcon Limited:

- Complies with data protection law and follow good practice
- Protects the rights of staff, customers and partners
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

Data Protection Law

The Data Protection Act 1998 describes how organisations (including Devcon Limited) must collect, handle and store personal information. These rules apply regardless of whether data is stored electronically, on paper or on other materials. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully. The Data Protection Act is underpinned by eight important principles. These say that personal data must:

- Be processed fairly and lawfully
- Be obtained only for specific, lawful purposes
- Be adequate, relevant and not excessive
- Be accurate and kept up to date
- Not be held for any longer than necessary
- Processed in accordance with the rights of data subjects
- Be protected in an appropriate way

People, Risks and Responsibilities

Policy Scope

This policy applies to:

- The head office of Devcon Limited
- All Construction Sites of Devcon Limited
- All staff and volunteers of Devcon Limited
- All sub-contractors, suppliers and other people working on behalf of Devcon Limited

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the Data Protection Act 1998. This can include:

- Names of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- ...plus any other information relating to individuals

Data Protection Risks

This policy helps to protect Devcon Limited from some very real data security risks, including:

- Breaches of confidentiality. For instance, information being given out inappropriately.
- Failing to offer choice. For instance, all individuals should be free to choose how the company uses data relating to them.

- Reputational damage. For instance, the company could suffer if hackers successfully gained access to sensitive data.

Responsibilities

Everyone who works for or with Devcon Limited has some responsibility for ensuring data is collected, stored and handled appropriately. Each team that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles. However, these people have key areas of responsibility:

- The board of directors is ultimately responsible for ensuring that Devcon Limited meets its legal obligations.

General Staff Guidelines

- The only people able to access data covered by this policy should be those who need it for their work.
- Data should not be shared informally. When access to confidential information is required, employees can request it from their line managers.
- Devcon Limited will provide training to all employees to help them understand their responsibilities when handling data.
- Employees should keep all data secure, by taking sensible precautions and following the guidelines below.
- In particular, strong passwords must be used and they should never be shared.
- Personal data should not be disclosed to unauthorised people, either within the company or externally.
- Data should be regularly reviewed and updated if it is found to be out of date. If no longer required, it should be deleted and disposed of.
- Employees should request help from their line manager or the data protection officer if they are unsure about any aspect of data protection.

Data Storage

These rules describe how and where data should be safely stored. When data is stored on paper, it should be kept in a secure place where unauthorised people cannot see it. These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

- When not required, the paper or files should be kept in a locked drawer or filing cabinet.
- Employees should make sure paper and printouts are not left where unauthorised people could see them, like on a printer.
- Data printouts should be shredded and disposed of securely when no longer required.
- When data is stored electronically, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:
- Data should be protected by strong passwords that are changed regularly and never shared between employees.
- If data is stored on removable media (like a CD or DVD), these should be kept locked away securely when not being used.
- Data should only be stored on designated drives and servers, and should only be uploaded to an approved cloud computing services.
- Servers containing personal data should be sited in a secure location, away from general office space.
- Data should be backed up frequently. Those backups should be tested regularly, in line with the company's standard backup procedures.
- Data should never be saved directly to laptops or other mobile devices like tablets or smart phones.
- All servers and computers containing data should be protected by approved security software and a firewall.

Data use

Personal data is of no value to Devcon Limited unless the business can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

- When working with personal data, employees should ensure the screens of their computers are always locked when left unattended.
- Personal data should not be shared informally. In particular, it should never be sent by email, as this form of communication is not secure.
- Employees should not save copies of personal data to their own computers. Always access and update the central copy of any data.

Data Accuracy

The law requires Devcon Limited to take reasonable steps to ensure data is kept accurate and up to date.

It is the responsibility of all employees who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

- Data will be held in as few places as necessary. Staff should not create any unnecessary additional data sets.
- Staff should take every opportunity to ensure data is updated. For instance, by confirming a customer's details when they call.
- Data should be updated as inaccuracies are discovered. For instance, if a customer can no longer be reached on their stored telephone number, it should be removed from the database.

Subject Access Requests

All individuals who are the subject of personal data held by Devcon Limited are entitled to:

- Ask what information the company holds about them and why.
- Ask how to gain access to it.
- Be informed how to keep it up to date.
- Be informed how the company is meeting its data protection obligations.

Disclosing Data For Other Reasons

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject. Under these circumstances, Devcon Limited will disclose requested data. However, Devcon Limited will ensure the request is legitimate, seeking assistance from the board and from the company's legal advisers where necessary.



L N Pope

Managing Director

16 May 2023



Anti-Discrimination Policy

Our Commitment on Discrimination

Devcon Limited is committed to eliminating unlawful discrimination and promoting equality and diversity in our own policies, practices and procedures and in influencing others to do the same in our dealings with staff, clients, tenants, and third parties. We aim to treat everyone equally and with the same attention, courtesy and respect regardless of their age, disability, gender, marital status, race, racial group, colour, ethnic or national origin, nationality, religion, belief or sexual orientation. We are committed to complying in both letter and spirit with all anti-discrimination legislation and associated codes of practice in force either now or in the future.

Unlawful Grounds for Discrimination

Discrimination on any of the following grounds is unlawful:

- age (in respect of employment matters only)
- race, racial group, colour, ethnic or national origins;
- gender, pregnancy, or marital status;
- disability;
- sexual orientation;
- religion or belief.

Forms of Discrimination

The following are the kinds of discrimination, which are against Devcon Limited's policy:

- (a) **Direct discrimination**, where a person is treated less favourably on the basis of a ground which is unlawful;
- (b) **Indirect discrimination**, where a provision, criterion or practice which seems to be lawful would create a significant disadvantage for a substantial number of one group of persons compared with other persons on the basis of an unlawful ground unless that provision, criterion, or practice is objectively justified by a legitimate aim and the means of achieving that aim are appropriate and necessary;
- (c) **Victimisation**, where someone is treated less favourably than others because he or she has taken action in respect of discrimination on unlawful grounds;
- (d) **Harassment**, when unwanted conduct related to any unlawful ground takes place with the purpose or effect of creating an intimidating, hostile, degrading, humiliating, or offensive environment for any person. This is not limited to physical acts and may include verbal and non-verbal communications and gestures.

Employment and Training

As an employer, we will treat all staff and job applicants equally and fairly and not discriminate unlawfully against them. We will ensure, for example, that arrangements for recruitment and selection, terms and conditions of employment, access to training opportunities, access to promotion and transfers, grievance and disciplinary processes, demotions, selection for redundancies, dress code, references, bonus schemes, work allocation and any other employment related activities do not constitute unlawful discrimination against any person or group of persons.

Recruitment

We recognise the value of a diverse workforce and will take steps to ensure that:

- (i) we recruit from the widest pool of qualified candidates possible;
- (ii) employment opportunities are open and accessible to all on the basis of their individual qualities and personal merit;
- (iii) selection criteria and processes do not discriminate unjustifiably on any of the unlawful grounds other than where we are exercising permitted positive action;
- (iv) all recruitment agencies acting for the Firm are aware of this policy and act in accordance with it.

Conditions of service

We will treat all staff equally and endeavour to create and maintain a working environment which is free from discrimination and harassment and which respects, wherever possible, the differing backgrounds and beliefs of employees. Terms and conditions of service for employees will comply with antidiscrimination legislation. The provision of any staff benefit such as working hours, leave and maternity leave arrangements, performance appraisal schemes, bonus schemes, dress codes, or any other conditions of employment will not discriminate against any employee on any unlawful grounds. Where it is possible and reasonable to do so, the Devcon Limited will endeavour to provide appropriate facilities and conditions of service which take into account the specific needs of employees which arise from their ethnic or cultural background; gender; responsibilities as carers; disability; religion or belief; or sexual orientation.

Promotion and Career Development

Promotion within Devcon Limited will be made without reference to any of the unlawful grounds and will be merit based. The selection criteria and processes for recruitment and promotion will be regularly reviewed to ensure that there is no unjustifiably discriminatory impact on any particular group. All employees will have equal access to training and other career development opportunities appropriate to their experience and abilities. However, Devcon Limited may take appropriate positive action measures where permitted or required by anti-discrimination legislation to provide special training and support for groups which are under-represented in the workforce and encourage them to take up training and career development opportunities.

Sub-Contractors, Suppliers, Agents, and Third Parties

Any decisions regarding the suitability of sub-contractors, suppliers, agents or other third parties to provide goods or services to us or to our clients will be made in accordance with this policy and not on any of the unlawful grounds. All sub-contractors, suppliers, agents, or other third parties instructed by Devcon Limited whether for itself or on behalf of clients, will be made aware of this policy and the need to adhere to it. Failure of any supplier, contractor, agent or other third party or of any of its staff to adhere to the principles set out in this policy or to carry out any discrimination on unlawful grounds will be investigated and appropriate action taken which may include immediate termination of our relationship with them.

Promoting Equality and Diversity

Just as we are committed to anti-discriminatory practices within our organisation we are also committed to promoting equality and anti-discrimination in areas in which we have influence. All staff will be informed of this policy and will be provided with training appropriate to their needs and responsibilities. All those who act on our behalf will be informed of this policy and will be expected to act in accordance with it when conducting business on our behalf. In all our dealings, including those with sub-contractors, suppliers, and recruitment agencies, we will seek to promote the principles set out in this policy.

Implementing the Policy

Responsibility

Ultimate responsibility for implementing the policy rests with Devcon Limited, s Managing Director Lawrence Pope. All our staff are expected to be aware and take notice of the provisions of our anti-discrimination policy and are responsible for ensuring compliance with it when fulfilling their duties or representing Devcon Limited. Acts of discrimination or harassment on any of the unlawful grounds or failure to comply with this policy by our staff will result in disciplinary action.

Complaints of discrimination

We will treat seriously, and, where appropriate, will take action regarding all complaints of discrimination or harassment on any of the unlawful grounds made by employees, clients, sub-contractors, or other third parties. All complaints will be investigated in accordance with our grievance or complaints procedure and the complainant will be informed of the outcome.

Questionnaires

We will endeavour to fully and promptly answer any statutory questionnaires served on us under the provisions in the Equality Act 2010 and any similar or future legislation.

Monitoring and review

The policy will be monitored and reviewed on a regular basis (and in any event at least annually) to measure its progress and judge its effectiveness. In particular, we will record and consider the number and outcome of complaints of discrimination

made by staff, clients, tenants, contractors and other third parties and the details of any potentially unlawful grounds for discrimination involved in any disciplinary action taken against employees. This information will be used to review the progress and impact of the Anti-Discrimination policy. Any changes required will be made and implemented.

A handwritten signature in black ink, appearing to read 'L N Pope', written over a horizontal line.

L N Pope
Managing Director
16 May 2023



Anti-Bribery and Corruption Policy

Policy Statement

The Bribery Act 2010 came into force on 1 July 2011 and creates a framework of five criminal offences:

- Giving, promising, and offering of a bribe
- Agreeing to receive or accept a bribe
- Bribing a foreign official
- Failure of commercial organisations to prevent bribery
- A senior officer of a commercial organisation consenting to or conniving in an act of bribery

Devcon Limited will conduct business in an honest and ethical manner. Devcon Limited takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships, wherever it operates, and implementing and enforcing effective systems to counter bribery.

Devcon Limited will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which it conducts business, including, in the UK, the Bribery Act 2010, which applies to conduct both in the UK and abroad.

Scope

All Devcon Limited employees, board members and others acting on behalf of Devcon Limited must comply with this Anti-Bribery and Corruption Policy and it extends to all business dealings and transactions. It is essential that Devcon Limited conducts an effective process of due diligence prior to entering into significant business relationships and that a record is kept of this process.

Any breach of the policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned. This could constitute gross misconduct for which an offending employee may be dismissed without notice. It may also cause serious damage to the reputation and standing of Devcon Limited.

Gifts and Hospitality

This policy does not prohibit normal and appropriate gifts and hospitality (given and received) to or from Third Parties unless otherwise specifically stated. However, any gift or hospitality:

- must not be made with the intention of improperly influencing a Third Party or Worker to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- must comply with local law in all relevant countries;
- must be given in the name of the organisation, not in an individual's name;
- must not include cash or a cash equivalent;
- must be appropriate in the circumstances;
- must be of an appropriate type and value and given at an appropriate time taking into account the reason for the gift; and
- must be given openly, not secretly.

It is not acceptable for an employee (or someone on their behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that they or Devcon Limited will improperly be given a business advantage, or as a reward for a business advantage already improperly given;
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to facilitate or expedite a routine procedure;
- accept payment from a Third Party where it is known or suspected that it is offered or given with the expectation that the Third Party will improperly obtain a business advantage;
- accept a gift or hospitality from a Third Party where it is known or suspected that it is offered or provided with an expectation that a business advantage will be improperly provided by Devcon Limited in return;
- threaten or retaliate against another member of staff who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy.

Facilitation Payment and ‘Kickbacks’

Devcon Limited does not make and will not accept facilitation payments or “kickbacks” of any kind such as small unofficial payments, or payments made in return for a business favour or advantage.

Charitable Donations and Sponsorship

Devcon Limited only makes charitable donations and provides sponsorship that are legal and ethical under local laws and practices and which are in accordance with Devcon Limited’s internal policies and procedures.

Record Keeping

Devcon Limited maintains appropriate financial records and has appropriate internal controls in place which evidence the business reason for gifts, hospitality and payments made and received.

Communication and Review

This policy will be communicated to staff via the Employee Handbook, during induction, and at staff meetings.

This policy will be reviewed on a biennial basis

A handwritten signature in black ink, appearing to read 'L N Pope', with a horizontal line underneath.

L N Pope
Managing Director
16 May 2023



Anti-Bribery and Corruption Statement

Issued to all Employees of Devcon Limited

The purpose of our full Policy document is to set out Devcon Limited's Policy on the giving and receiving of gifts, hospitality and entertainment, and our responsibilities to ensure transparency, provide clarity on acceptable behaviour and comply with the UK Bribery Act 2010.

Bribery

Bribery is the offering, promising, giving, solicitation or the receipt or agreement to receive any financial or other advantage, or any other inducement from any person or company, (wherever they are situated and whether they are a public official or body, a private person or company) by an individual employee, agent or other person or body acting on another's behalf.

Corruption

Corruption is the abuse of entrusted power for a private gain.

Our Principle

As a general policy Devcon Limited does not believe that giving and receiving gifts is appropriate to the efficient conduct of our organisation. We shall not offer, give or receive bribes or improper payment in any circumstances. Nor shall we participate in any kind of corrupt activity, either directly or through a third party, for instance to secure new business, extend a current agreement, or increase our monetary income. We will not allow any others working on our behalf to do this either.

We will always be clear and transparent in any tender process with clients and customers in relation to extending agreements, the award of new work or a change in agreed pricing terms. This also applies to sub-contractors and suppliers in relation to prices and/or terms and conditions of our trade agreements. We shall ensure that all agreements in relation to our supply chain and client services are clearly documented and we shall ensure that any variations to our contract, rebates or offers of work are appropriate, correct and fairly considered.

Taking our Responsibilities Seriously

All employees are accountable for their actions and are required to conduct business with integrity. If in doubt regarding inappropriate behaviour or a particular course of action, you should seek guidance from your Line Manager. Each Devcon Limited employee is expected to be familiar with and follow the policies, laws and regulations that apply to our jobs; conduct our business according to the highest ethical and legal standards; and, if we ever become concerned that Devcon Limited or our colleagues are falling short of these standards, to voice our concerns. This policy represents guiding principles only – it cannot anticipate all circumstances and situations that employees may encounter. The exercise of good judgement is still expected from employees at all times. The policy does not alter the terms and conditions of your employment, rather it assists each of us in knowing what is expected of us and where to go for advice and help if necessary.

Avoiding Bribery and Corruption Risk

Devcon Limited is committed to ensuring adherence to legal and ethical standards in every aspect of the way in which we operate our business. This is not just a cultural commitment on the part of the Organisation; it is a legal requirement. Bribery is a criminal offence and corrupt acts expose us and our employees to the risk of prosecution, fines and imprisonment, as well as endangering Devcon Limited's reputation. It is Devcon Limited's policy to conduct business in an honest way, without the use of corrupt practices or acts of bribery to obtain an unfair advantage. Any form of benefit whether financial or not can be considered to be a bribe, if given with the requisite intention.

Avoiding Fraudulent Practices

Bribery in procurement decisions is any advantage which constitutes the provision of an improper advantage. For example,

any advantage which improperly influences a decision maker in order to award a contract to Devcon Limited could be considered a bribe. Careful consideration needs to be given as to whether any advantage offered could be considered a bribe. Advantages which could be considered as a bribe are benefits provided personally to a decision maker or a group of decision makers which lead them to breach duties of good faith to a third party. Fraudulent practices are strictly prohibited. This includes practices which can impair, harm or influence procurement or selection or contract execution. Such practices involve any acts that mislead, whether recklessly or intentionally, any person, involved in the procurement, selection or contract execution process.

The Company recognises that the giving and accepting of gifts, entertainment and hospitality can sometimes be part of building normal business relationships. However, regardless of local laws and customs, some gifts and hospitality can lead to the suggestion that an improper influence has been asserted either on or by Devcon Limited, or that a conflict of interest has arisen. In some instances, the giving and/or receiving of gifts and entertainment can be interpreted as a bribe, which is unlawful and which can lead to criminal prosecution for those individuals involved as well as the company. Should you have any questions in this regard please contact your line manager.

Date:

Signed:

Whistleblowing Policy

Policy Statement

Devcon Limited encourages a free and open culture in dealings between its managers, employees and all people with whom it engages in business and legal relations. In particular, we recognise that effective and honest communication is essential if concerns about breaches or failures are to be effectively dealt with.

This policy is designed to provide guidance to all those who work with or within the company who may from time to time feel that they need to raise certain issues relating to the company with someone in confidence.

Anyone who in the public interest raises genuine concerns under this policy will not under any circumstances be subjected to any form of detriment or disadvantage as a result of having raised their concerns.

Procedure

1. This policy will apply in cases where individuals genuinely believe that one of the following sets of circumstances is occurring, has occurred or may occur within the company and that it is in the public interest for the employee to disclose it. The matters that may be disclosed in this way are that:

- A criminal offence has been committed, is being committed or is likely to be committed.
- A person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject.
- A miscarriage of justice has occurred, is occurring or is likely to occur.
- The health and safety of any individual has been, is being or is likely to be endangered.
- The environment has been, is being or is likely to be damaged.
- Information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.

2. There is no need for an individual to prove that the breach or failure that they are alleging has occurred or is likely to occur; a reasonable suspicion will suffice, i.e., where the individual reasonably believes that the information disclosed is substantially true. However, it should be noted that they are not entitled to make a disclosure if in so doing they commit a criminal offence.

3. If workers wish to raise or discuss any issues which might fall into one of the categories listed in Section 1, they should contact the Managing Director, or in his absence the Construction Director. This person will, insofar as is possible, treat the matter in confidence. It is likely that an investigation will be necessary and the employee who has made the disclosure may be required to attend an investigatory hearing and/or a disciplinary hearing (as a witness). Appropriate steps will be taken to ensure that the individuals working relationships are not prejudiced by the fact of the disclosure.

4. If felt that the relevant failure (i.e., one of the set of circumstances listed above under Section 1) relates wholly or mainly to the conduct of a person other than their employer or any other matter for which a person other than the company has legal responsibility, then they should make that disclosure to that other person.

5. Everyone should be aware that the policy will apply where they reasonably believe that the information disclosed and any allegation contained in it are substantially true. If any disclosure concerns information which employees do not substantially believe is true, or indeed if the disclosure is made for personal gain, then such a disclosure will constitute a disciplinary offence for the purposes of the company's disciplinary policy and procedures and may constitute gross misconduct for which summary dismissal maybe an outcome.

6. While we hope that such disclosures will never be necessary, we recognise that we may find circumstances which are new to it, therefore, each case will be treated on its own merits.

7. Anyone who makes a disclosure is protected from detrimental treatment by the company, by a colleague or by an agent of the business. An employer is vicariously liable for detrimental treatment. If this occurs, it should be raised immediately with the line manager so that the matter can be investigated thoroughly without undue delay. Detrimental treatment includes, for example, harassment and bullying or not complying with a person's rights and entitlements under his or her contract of employment.

8. An employee is also protected from dismissal by the company for making a protected disclosure.

A handwritten signature in black ink, appearing to read 'L N Pope', written over a horizontal line.

L N Pope
Managing Director
16 May 2023



Anti-Tax Evasion Policy

Overview

In the light of Criminal Finances Act 2017, Devcon Limited has adopted a statement of our corporate value on anti-facilitation of tax evasion. It is our policy to conduct all of our business dealings in an honest and ethical manner. The value statement governs all our business dealings and the conduct of all persons or organisations who are appointed to act on our behalf. We request all our employees and all who have, or seek to have, a business relationship with Devcon Limited to familiarise themselves with our anti-tax evasion value statement and to act at all times in a way which is consistent with our anti-tax evasion value statement.

Our Anti-Tax Evasion Value Statement

Devcon Limited (the “Company”) has a zero-tolerance approach to all forms of tax evasion, whether under UK law or under the law of any foreign country.

Employees and Associates of the Company must not undertake any transactions which:

- (a) cause the Company to commit a tax evasion offence; or
- (b) facilitate a tax evasion offence by a third party who is not an associate of the Company.

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

At all times, business should be conducted in a manner such that the opportunity for, and incidence of, tax evasion is prevented.

Who Must Comply With This Policy?

This policy applies to all persons working for the Company or on our behalf in any capacity, including employees at all levels, directors, agency workers, seconded workers, volunteers, interns, subcontractors, external consultants, third-party representatives or any other person associated with us, wherever located.

Who is responsible for this Policy?

The Board of Directors of the Company has overall responsibility for ensuring that this policy complies with our legal obligations, and our employees and associates comply with it. This policy is adopted by the Company. It may be varied or withdrawn at any time, in the Company’s absolute discretion. Employees in leadership positions are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it.

What Is The Facilitation of Tax Evasion?

For the purposes of this policy:

Associates includes company subcontractors or agents of the Company (other than subcontractors) who are acting in the capacity of an agent, or any person who performs services for and on behalf of the Company who is acting in the capacity of a person or business performing such services.

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

Foreign Tax Evasion means evading tax in a foreign country, provided that the conduct is an offence in that country and would be a criminal offence if committed in the UK. As with tax evasion, the element of fraud means there must be deliberate action, or omission with dishonest intent.

Tax Evasion Facilitation means being knowingly concerned in, or taking steps with a view to, the fraudulent evasion of tax (whether UK tax or tax in a foreign country by another person, or aiding, abetting, counselling or procuring the commission of that offence. Tax evasion facilitation is a criminal offence, where it is done deliberately and dishonestly.

Tax evasion is not the same as tax avoidance or tax planning. Tax evasion involves deliberate and dishonest conduct. Tax

avoidance is not illegal and involves taking steps, within the law, to minimise tax payable (or maximise tax reliefs).

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

Your Responsibilities

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

The prevention, detection and reporting of tax evasion and foreign tax evasion are the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. For example, if an employee or supplier asks to be paid into an offshore bank account, without good reason, or a supplier asks to be paid in cash, indicating that this will mean the payment is not subject to applicable tax. Further “red flags” that may indicate potential tax evasion are set out on the last page of this document.

What Team Members and Associates Must Not Do

Employees and Associates must at all times adhere to the Devcon Limited anti-tax evasion value statement and must ensure that they read, understand and comply with this policy.

It is not acceptable for team members and Associates to:

- Engage in any form of facilitating Tax Evasion or Foreign Tax Evasion
- Aid, abet, counsel or procure the commission of a Tax Evasion offence or Foreign Tax Evasion offence by another person;
- Fail to promptly report any request or demand from any third party to facilitate the fraudulent Evasion of Tax by another person, in accordance with this policy; or
- Engage in any other activity that might lead to a breach of this policy; or
- Threaten or retaliate against another individual who has refused to commit a Tax Evasion offence or a Foreign Tax Evasion offence or who has raised concerns under this policy
- An offence under the law of any part of the UK consisting of being knowingly concerned in, or taking steps with a view to, the fraudulent evasion of tax.

Prevention Through Vigilance

There is not an exhaustive list of Tax Evasion opportunities. At a more general level, the best defence against Tax Evasion and facilitation of Tax Evasion remains the vigilance of our employees and Associates and the adoption of a common-sense approach supported by our clear whistleblowing procedure. In applying common sense, team members must be aware of the following:

- Is there anything unusual about the manner in which an Associate of the Company is conducting their relationship with the Company or a third party.
- Is there anything unusual about the subcontractors or Associate’s conduct or behaviour in your dealings with them?
- Are there unusual payment methods?
-

Unusual payment methods and unusual conduct of third parties with Company Associates can be indicative that a transaction may not be as it seems.

How To Raise a Concern

Our employees have a responsibility to take reasonable action to prevent harm to Devcon Limited and we hold our employees accountable for their actions and omissions. Any actions that breach the Criminal Finances Act and the tax laws of wherever we operate brings harm to Devcon Limited and will not be tolerated.

You are responsible for properly following Devcon Limited’s policies and procedures. These should generally ensure that all taxes are properly paid. If you are ever asked by anyone either inside or outside our company to go outside our standard procedures, this should be reported without delay, as someone may be attempting to evade tax.

What Happens If the Employee Prefers, For Commercial Reasons, Not To Report Their Suspicions?

This should never happen. If there is any suspicion of any intention to evade tax and the transaction is nevertheless finalised, the Company can be criminally prosecuted, subject to a large fine and be publicly named and shamed.

Potential 'Red Flag's'

The following is a list of possible red flags that may arise while you work for us and which may raise concerns related to tax evasion or foreign tax evasion. The list is not intended to be exhaustive and is for illustrative purposes only. If you encounter any of these red flags while working for us, you must report them promptly to your line manager:

- you become aware, in the course of your work, that a third party has made or intends to make a false statement relating to tax; has failed to disclose income or gains to, or to register with, HMRC (or the equivalent authority in any relevant non-UK jurisdiction); has delivered or intends to deliver a false document relating to tax; or has set up or intends to set up a structure to try to hide income, gains or assets from a tax authority;
- you become aware, in the course of your work, that a third party has deliberately failed to register for VAT (or the equivalent tax in any relevant non-UK jurisdiction) or failed to account for VAT;
- a third-party requests payment in cash and/or refuses to sign a formal order or fee agreement, or to provide an invoice or receipt for a payment made;
- you become aware, in the course of your work, that a third party working for us as an employee asks to be treated as a self-employed contractor, but without any material changes to their working conditions;
- a supplier or other subcontractor is paid gross when they should have been paid net, under a scheme such as the Construction Industry Scheme;
- a third-party request that payment is made to a country or geographic location different from where the third party resides or conducts business;
- a third party to whom we have provided services requests that their invoice is addressed to a different entity, where we did not provide services to such entity directly;
- a third party to whom we have provided services asks us to change the description of services rendered on an invoice in a way that seems designed to obscure the nature of the services provided;
- you receive an invoice from a third party that appears to be non-standard or customised;
- a third party insists on the use of side letters or refuses to put terms agreed in writing or asks for contracts or other documentation to be backdated;
- you notice that we have been invoiced for a commission or fee payment that appears too large or too small, given the service stated to have been provided;
- a third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us.

This Policy alongside all of our high-level policies will be reviewed at least annually to ensure they are continually developed and remain fit for purpose.



L N Pope
 Managing Director
 16 May 2023



Cyber Security Policy

Introduction

The risk of data theft, scams, and security breaches can have a detrimental impact on a company's systems, technology infrastructure, and reputation. As a result, Devcon Limited has created this policy to help outline the security measures put in place to ensure information remains secure and protected.

Purpose

The purpose of this policy is to (a) protect Devcon Limited data and infrastructure, (b) outline the protocols and guidelines that govern cyber security measures, (c) define the rules for company and personal use, and (d) list the company's disciplinary process for policy violations.

Scope

This policy applies to all of Devcon Limited's remote workers, permanent, and part-time employees, contractors, volunteers, suppliers, interns, and/or any individuals with access to the company's electronic systems, information, software, and/or hardware.

Confidential Data

Devcon Limited defines "confidential data" as:

- Unreleased and classified financial information.
- Customer, supplier, and shareholder information.
- Customer leads and sales-related data.
- Patents, business processes, and/or new technologies.
- Employees' passwords, assignments, and personal information.
- Company contracts and legal records.

Device Security

Company Use

To ensure the security of all company-issued devices and information, Devcon Limited employees are required to:

- Keep all company-issued devices password-protected (minimum of 8 characters). This includes tablets, computers, and mobile devices.
- Secure all relevant devices before leaving their desk.
- Obtain authorization from the Office Manager before removing devices from company premises.
- Refrain from sharing private passwords with coworkers, personal acquaintances, senior personnel, and/or shareholders.
- Regularly update devices with the latest security software.

Personal Use

Devcon Limited recognizes that employees may be required to use personal devices to access company systems. In these cases, employees must report this information to management for record-keeping purposes. To ensure company systems are protected, all employees are required to:

- Ensure all personal devices used to access company-related systems are password protected (minimum of 8 characters).
- Install full-featured antivirus software.
- Regularly upgrade antivirus software.
- Lock all devices if left unattended.
- Ensure all devices are protected at all times.
- Always use secure and private networks.

Email Security

Protecting email systems is a high priority as emails can lead to data theft, scams, and carry malicious software like worms and bugs. Therefore, Devcon Limited requires all employees to:

- Verify the legitimacy of each email, including the email address and sender name.
- Avoid opening suspicious emails, attachments, and clicking on links.
- Look for any significant grammatical errors.
- Avoid clickbait titles and links.
- Contact the IT department regarding any suspicious emails.

Transferring Data

Devcon Limited recognizes the security risks of transferring confidential data internally and/or externally. To minimize the chances of data theft, we instruct all employees to:

- Refrain from transferring classified information to employees and outside parties.
- Only transfer confidential data over Devcon Limited networks.
- Obtain the necessary authorization from senior management.
- Verify the recipient of the information and ensure they have the appropriate security measures in place.
- Adhere to Devcon Limited's data protection law and confidentiality agreement.
- Immediately alert the IT department regarding any breaches, malicious software, and/or scams.

Disciplinary Action

Violation of this policy can lead to disciplinary action, up to and including termination. Devcon Limited's disciplinary protocols are based on the severity of the violation. Unintentional violations only warrant a verbal warning, frequent violations of the same nature can lead to a written warning, and intentional violations can lead to suspension and/or termination, depending on the case circumstances.

**L N Pope**

Managing Director

16 May 2023

Corporate Social Responsibility Policy

Purpose

We recognise that the delivery of our service has a direct impact on the environment and local community and that we have a responsibility to be a good neighbour, a good employer and a responsible consumer of resources.

We undertake the following in order to contribute to our community and mitigate our impact on the environment:

Scope

Our responsibility to our Employees

- To support and encourage employees to be involved in charitable activities within the local community.
- To ensure that employees have the opportunity to realise their full potential and have the tools necessary to develop and grow through training, both compulsory and optional.
- To operate an open door policy allowing employees to raise any concerns with line managers and HR and to ensure that employees are not victimised for doing so.
- To ensure that each employee's traditions and beliefs are respected, and encourage and promote diversity throughout the organisation.
- To maintain communication with employees so as to ensure this and all other policies are actively exercised.
- To encourage employees to 'think outside of the box' and offer suggestions as to how any policy or process can be improved.
- To reward employees for hard work and innovative thinking should the idea help in the running of the business.
- To protect each employee or supplier from third parties who may become abusive; this includes customers, suppliers and the general public.
- To ensure that employees protect and do not misuse company assets only use them in an appropriate manner as set out in the employee contract.
- To make certain that all employees are aware of the impact that we as a business and they as individuals have on the external environment.
- To support and understand employee well-being, ensuring staff are encouraged to maintain an appropriate work-life balance.

Our Business Responsibilities

- To minimise our usage of electricity by ensuring all electrical appliances, where possible, are switched off at the end of each day.
- To adhere to all relevant legislation surrounding our industry and, where necessary, will seek legal advice in order to ensure honest trade.
- To support charitable initiatives that align with company values to be reviewed annually through the CSR strategy.
- To compete fairly within our industry.

Bribery

- To comply with the Bribery Act 2010 and any amendments made to such legislation and acts.
- To make certain that no employee working on behalf of the Company shall accept or offer a bribe.
- To put in place necessary procedures in order to adhere to the Bribery Act 2010. Please see Anti-Bribery and Corruption Policy.

Gifts

To maintain that no employee shall accept personal gifts from customers or suppliers. If any employee is unsure as to whether what they are being offered constitutes as a gift then they are to refer to the company's Corporate Gifts and Hospitality Policy.

Conflicts Of Interest

To instil on our employees that they must respect the privacy of each member of the company. Each member is encouraged to avoid any activities which could conflict with their responsibilities to the company.

Confidentiality

- To ensure all employees adhere to the legislation included in and surrounding the Data Protection Act 1998. Please see the company's Data Protection Policy.
- To maintain a safe working environment for all employees and also a safe consulting environment for clients. Please see the company's Health and Safety policy for further guidance.

Environmental

- To have a separate Environmental Policy which addresses all issues surrounding this area. We are committed to delivering on all of our individual targets.
- To utilise technology throughout our processes to reduce our paper usage and reliance on natural materials and resources.
- To suppress our requirement for energy by reducing case duration and operational processes.

Customers

- To constantly strive to provide efficient, value for money, high quality and dependable services to all customers.
- To ensure all employees are to act in an honest and professional manner when dealing with all customers.
- To make sure all employees remain aware that they are being trusted with highly sensitive information and must not break the trust that our customers, suppliers and company as a whole have in them.

Supply Chain

- To maintain working relationships as they are key to the success of our business.
- To ensure that the individuals who we outsource to are not in breach of any legislation surrounding their profession or our industry as a whole.

The Local Community

- To create employment opportunities for the local community where possible.
- To be aware that our business affects our local and wider community whether as employees, customers or suppliers so we are constantly striving to build partnerships in order to create positive change.

Security

- To ensure that the building is safe at all times to ensure the security of data and staff.
- To ensure that our IT systems are well guarded and secure for the security of data.
- To provide a safe working environment for all employees and a safe examining environment for all customers visiting us.

Employment

- To create equal opportunities for all employees. Please see the company's Anti-Discrimination Policy.
- To ensure all members of the company will not discriminate against colleagues or employees as per, but not exclusive to, the protected characteristics as detailed in the Equality Act 2010. Any instance where an employee is found to be non-compliant with this section 13.2 will be treated seriously as this will not be tolerated.
- To ensure all recruitment will be fair and consistent to each candidate.
- To ensure that any employee who feels that they have grounds for complaint must follow the company's grievance procedure which is accessible to all.

This policy will be reviewed annually.



L N Pope

Managing Director

16 May 2023



Bullying and Harassment Policy

Introduction

Devcon Limited is committed to providing a working environment free from bullying and harassment. We aim to ensure that all staff are treated, and treat others, with dignity and respect.

This policy covers bullying or harassment which occurs at work and out of the workplace, including on work trips or at work-related events or social functions.

This policy applies to all staff at all levels including employees, management, agency and casual workers, and independent contractors.

Harassment

Harassment is any unwanted conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

A single incident can amount to harassment. A person may be harassed even if they were not the intended "target".

Harassment also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

It is unlawful under the Equality Act 2010 to harass a person because of their age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation. It also includes conduct of a sexual nature (sexual harassment). Harassment is unacceptable even if it does not fall within any of these categories.

Examples of harassment include, but are not limited to:

- unwanted physical conduct including touching, pinching, pushing and grabbing;
- unwelcome sexual advances or suggestive behaviour;
- offensive e-mails, text messages or social media content or the display of offensive materials;
- unwanted jokes, banter, mocking, mimicking or belittling a person.

Bullying

Bullying is offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient. Bullying can include the use of personal strength or the power to coerce through fear or intimidation, not necessarily from someone in a position of authority. Bullying may be physical, verbal or non-verbal. It can include conduct that is not face-to-face, including via text message, email and social media.

Examples of bullying include:

- physical or psychological threats;
- overbearing and intimidating levels of supervision;
- inappropriate derogatory remarks about a person or their performance;
- shouting at staff;
- persistently picking on people in front of others or in private;
- blocking promotion and training opportunities;
- regularly and deliberately ignoring or excluding staff from work activities or work related social events;
- setting a person up to fail by overloading them with work or setting impossible deadlines;
- regularly making the same person the butt of jokes.

Legitimate and reasonable criticism of a staff member's performance or behaviour, or reasonable management instructions, do not amount to bullying.

Breaches of this Policy

Bullying and harassment are not tolerated in our workplace and all staff are required to treat each other, along with our customers, suppliers, and visitors, with dignity and respect.

Breaches of this policy will be dealt with in accordance with our disciplinary procedure.

Serious cases of bullying or harassment may amount to gross misconduct resulting in dismissal.

Staff who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our disciplinary procedure. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under our disciplinary procedure.

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L N Pope

Managing Director

16 May 2023

Occupational Health Statement

Introduction

The health and wellbeing of employees is a core value of Devcon Limited and the provision of occupational health is a key aspect of the company policy. Occupational health is concerned with the inter-relationship between work and health, i.e. how work and the working environment can affect a member of staff's health and how a member of staff's health can affect their ability to do their work.

The principal aim of our occupational health policy is therefore the prevention of ill-health in the workplace through:

- Assisting with the identification and management of health risks
- Supporting those staff who are ill to remain at or return to work as appropriate
- Improving work opportunities for those with disabilities
- Managing work-related aspects of illness
- The promotion of good health to better equip staff to do their work well and make informed lifestyle choices

Our Commitment

The company is committed to ensuring that the potential for ill-health or injury arising from their activities or premises is minimised so as far as is reasonably practicable through the implementation of the following measures:

- We will ensure that health risks arising from our activities are identified so as to enable the implementation of the necessary control measures and where appropriate we will carry out occupational health interventions and health surveillance
- We will provide all managers and staff with health education training to ensure they are aware of the nature, causes, effects and appropriate management of ill-health in the workplace
- We will encourage a culture where managers take an active interest in the health and wellbeing of their staff
- We will ensure the early identification and management of work related ill-health
- We will enable staff to raise, discuss and resolve individual work-related ill-health issues with their line manager or HR
- We will ensure that staff who are identified as particularly at risk of ill-health from their work or whose health affects their work, are provided with appropriate advice and support

Managers/Supervisors

Will ensure that the health of employees is not adversely affected by their work through:

- Proactively considering the effect of work activities on health, so enabling the introduction of appropriate measures to eliminate or minimise any adverse impact
- Ensuring risk assessments are undertaken that consider work related health hazards
- Providing appropriate information, instruction and training to staff with regards health risks
- Ensuring the early intervention and management of work-related ill-health issues
- Implementing the appropriate working arrangements, reasonable adjustments and support for staff that are identified as at particular risk

Employees

Will ensure that their own health and wellbeing is not adversely affected by their work through:

- Making informed life choices with regard to their health
- Informing their supervisor of any health condition that might affect or be affected by their work activities, the workplace or other persons
- Co-operating with their supervisors and others with regard to the implementation of appropriate measures to control health risks in the workplace and elsewhere

A handwritten signature in black ink, appearing to read "L N Pope", written over a horizontal line.

L N Pope

Managing Director

16 May 2023



Mental Health & Wellbeing Policy

Introduction

This Policy is part of the Health & Wellbeing Framework which is made up of a number of elements which together encompass all formal policy, procedure and statement documents, including associated forms, relating to health & wellbeing in Devcon Limited.

Purpose and Scope

This policy applies to all employees. Devcon Limited is committed to achieving a healthy workforce by placing value on both physical and mental health. Devcon Limited also recognises that mental health issues can be triggered by excessive levels of work related stress and it is Devcon Limited's duty of care to take measures as reasonably practicable to preserve the mental health and well-being of its employees whilst at work. Devcon Limited recognises the importance of ensuring that all employees are able to work in a supportive, professional and caring environment, where they are valued and respected. By applying these values to our work practices we aim to promote mental wellbeing and prevent stress by promoting a supportive work place culture. The concept of positive mental health and well-being implies a state of health characterised by emotional and spiritual resilience that allows us to enjoy life and to survive pain, disappointment and sadness.

Mental health problems can be triggered by stress arising from the workplace or outside world; mental wellbeing at work is determined by the interaction between the working environment, the nature of the work and the individual. Devcon Limited promotes a comprehensive approach to tackling mental health issues arising from the workplace or personal circumstances by addressing prevention, management and support.

This policy requires a shared understanding between employees and managers that mental ill health can be a legitimate health issue in the workplace. Employees experiencing difficulties that could lead to them experiencing mental ill health should be encouraged to seek help and support. Employees have a duty to themselves and others to help minimise mental ill health in the workplace and should take an active part in mental well-being management initiatives. This policy should be read in conjunction with Devcon Limited's other policies and procedures. Devcon Limited will identify and detail the factors which may cause increased stress in the workplace by Risk Assessment.

Definitions

The term "mental ill health" is one which encompasses a wide range of experiences which affect an individual's ability to balance his/her life. The difficulties can range from stress and anxiety through to serious mental health conditions diagnosed and treated by the health services. The Health and Safety Executive (HSE) defines stress as an adverse reaction to excessive pressure or other type of demand placed on them. This makes an important distinction between pressure, which can be a positive state if managed correctly, and stress which can be detrimental to health.

Policy Aims

Our policy aims to:

- Not tolerate any discrimination attached to mental illness, which includes barriers to employment in accordance with the equal opportunities policy;
- Prevent so far as is reasonably practicable, those circumstances detrimental to mental health by providing a working environment where hazards to health are identified, assessed, removed or reduced;
- Raise awareness of mental ill health including stress, its causes and associated factors;
- Ensure that employees who have, or have had, symptoms of mental ill health are treated responsibly and in an understanding manner;
- Promote mental health support available to Devcon Limited's employees;
- Ensure that all employees, especially those with management and supervisory responsibilities, take proactive steps to ensure that the overall working environment it provides are conducive to mental wellbeing;
- Ensure that managers provide employee support during periods of sickness absence and return to work interviews to support individuals in their return to and rehabilitation in work in accordance with Devcon Limited's sickness absence policy;

Principles

- All cases will be dealt with in accordance with Devcon Limited's policies on equality and diversity;
- Cases will be treated with the utmost confidentiality and related documentation will be subject to the provisions of the Data Protection Act;
- Devcon Limited will not disadvantage unfairly an employee who admits to suffering from work related stress or and mental health problem.

Responsibilities

Devcon Limited is responsible for ensuring that:

- Stress, which is likely to lead to ill health, is reduced as far as practicably possible in the work environment;
- Devcon Limited's culture promotes a positive attitude to mental health and wellbeing;
- Information is provided for employees on positive coping mechanisms and general health improving activities within the workplace;
- Advice, information, and how to access support is provided for all employees including recognising the symptoms of poor mental health;
- Managers are knowledgeable in their duty of care for employees;
- Supervision is in place to ensure confidentiality where people can gain support in dealing with poor mental health;
- A plan is implemented to reduce work place stress, and promote mental wellbeing.
- Encouraging a workplace culture where mental health, wellbeing and physical wellbeing are regarded as equally important;
- Carrying out risk assessments in their work areas to identify any hazards that could give rise to mental health issues and act upon these hazards to eliminate or minimise them where practicable;
- Ensuring employees are fully trained to do their job and understand their role;
- Effective communication with employees, particularly when there are organisational and procedural changes;
- Considering the implications for employees of any changes to working practices, ways of working, work location, new policies or procedures, and the need for appropriate support and training;
- Recognising and resolving work-related issues at individual and team level where possible;
- Liaising with HR to maximise support to employees who have mental / physical health issues;
- Managing absence in accordance with the policy;
- Ensuring employees are managing the demands of the job by monitoring work loads, working hours and monitoring absence;
- Carrying out exit interviews;
- Ensuring that bullying and harassment is not tolerated within their work area;
- Ensuring that employees returning to work after a period of absence due to mental ill health are treated in a sensitive and sympathetic manner. If the cause absence is thought to be due to work related issues, managers must ensure that these are risk managed before the individual resumes their duties.

Employees are responsible for:

- Using Devcon Limited's support, supervision, and employee counselling appropriately;
- Reporting to their line manager or HR of any risk to mental health within the work place that may pose a risk to themselves or others;
- Supporting their colleagues if they are experiencing poor mental health encouraging them to talk to their manager;
- Seeking support from their G.P. or other appropriate agencies if they have health issues;
- Discussing with their manager any appropriate measures to make their work less stressful;
- Recognising the principles and importance of work life balance;
- Exercising their right to attend stress management courses;
- Taking positive steps to safeguard their own mental health, in particular by taking regular allocated breaks and by working reasonable hours.

HR is responsible for:

- Ensuring that Occupational Health and Employee Counselling services are accessible for all employees;
- Monitoring the application of the policy to ensure that is applied with consistency;
- Making sure that policies and codes of conduct are appropriate;
- Monitoring and evaluating recruitment practices in relation to equal opportunities;
- Participating in Devcon Limited's plan to reduce stressors and promote positive mental health;
- Offering advice and support for managers in dealing with instances of mental ill health at work;
- Liaising with managers over return to work arrangements following a period of absence;

A handwritten signature in black ink, appearing to read 'L N Pope', written over a horizontal line.

L N Pope
Managing Director
16 May 2023



Gifts & Hospitality Policy

Introduction

Gifts and hospitality are often used in the course of business as a means to build goodwill and strengthen working relationships. Giving and receiving appropriate gifts and hospitality can be part of building and strengthening normal business relationships. However, gifts or hospitality (including entertainment) may create a conflict of interest or illicit payment, or the perception of inappropriate business conduct.

Violations of the Gifts and Hospitality Policy (“the Policy”) could damage the integrity of the business relationship, Devcon Limited’s reputation, and may also lead to regulatory action including fines and/or debarment for Devcon Limited, and/or criminal prosecution for those individuals involved. When giving or receiving a gift or hospitality, you should always consider how it will be perceived by others and act accordingly.

Purpose

This Policy provides guidance for gifts, hospitality and entertainment whether given or received while conducting legitimate business activities. It describes Devcon Limited’s approval process and provides guidance on potential ‘red flags’ areas to be avoided. It also provides direction for document maintenance and record keeping in relation to gift/hospitality.

This Policy plays an important part in demonstrating Devcon Limited’s strong commitment to a positive ethical culture and avoidance of bribery and corruption.

Who Does This Policy Apply To?

This Policy applies to all Devcon Limited employees, which includes officers, employees (full and part time), and temporary workers (such as consultants and short-term or fixed-term workers) of any Devcon Limited company, subsidiary, affiliates, or third parties representing Devcon Limited.

What Is a Gift?

A gift is a tangible item, any payment, or an advantage given or received without payment. This includes, but is not limited to:

- Goods like flowers, gift bags, chocolates, a bottle of wine;
- Personal discounts, commissions or anything else of financial value ;
- Holiday presents;
- Cash, payments, loans or advances or cash equivalents like gifts certificates, gift vouchers, gift cards, shopping cards, etc. (note: these are always prohibited);
- Stocks, shares, equities;
- Free services, such as insurance, tuition fees, repair or improvement activities or any preferential treatment;
- Technology devices and tools (iPads, Chromebooks, computers, mobile devices, etc.);
- Product subscriptions or licenses;
- Transportation;
- Use of a giver’s time, materials and facilities.

What Is Hospitality?

Hospitality means any form of amenity, entertainment, travelling or accommodation or invitation offered or received.

Hospitality also includes any Third-Party Travel Expenses, such as transportation and accommodation. These include, but are not limited to:

- Meals: breakfast, lunch, dinner, cocktails, receptions;
- Hotel accommodation;
- Travel and trips by car, air, train or boat;
- Seminars, conventions, conferences, or forums;
- Invitations to sporting, cultural or social events.

When Is Giving or Receiving a Gift or Hospitality Appropriate?

In certain geographies and business scenarios, there may be situations when accepting/ offering gifts is appropriate. In those situations, the gift or hospitality must only occur when:

- It is done purely for business reasons (and not for obligatory or influencing reasons).
- When there is a legitimate business purpose (i.e., expenses designed to support or promote Devcon Limited's products, its brand, or reputation or to further a legitimate business relationship (such as with customers, representatives and other Business Partners).
- When it is proportionate to the relationship you have with the giver/recipient. See below for guidance on factors to help establish proportionality.
- When it does not give a sense of obligation to the receiver to do something differently or improperly. And, if you are the giver, you are not expecting anything improper in return.
- When provided or received openly and transparently.

Determining Proportionality

Consider the circumstances surrounding the offer or acceptance of a Gift or Hospitality.

- Is it high value or lavish?
- Is it offered at a time when business decisions are being made which may improperly affect the decision of the giver/recipient of the Gift or the host of the Hospitality event?
- Has the Gift or Hospitality been offered multiple times to the same person?
- If the answer to any of these questions is "yes," then the gift is unlikely to be proportional. In these situations, or any other time you may have a question, please contact your line manager to get additional support and guidance.

NOTE: Proportionality is not an exact science; it is a question of looking at all the circumstances.

Prohibited Gifts and Hospitality Under All Circumstances

- Cash or cash equivalents (such as gift cards or certificates, stock, or travellers' checks) are prohibited as gifts.
- Anything indecent or sexually oriented (for example, adult entertainment) or that may insult a person's gender, race, national origin, religion, age, disability, identity or reassignment, sexual orientation, or any other protected characteristics.
- Anything which is unlawful under the laws and regulations of the recipient's country or the policies of the recipient's organisation.
- Any gift or hospitality to or from a family member of a Government Official.
- A cash equivalent such as gold or other precious metals, gems or stones.
- Gifts given or received in the form of service or other non-cash benefit (e.g., a promise of employment, direct payment of bills, etc.).

NOTE: in some circumstances, including product feedback, raffles or sweepstakes, a gift card may be used. However, these are limited and specific situations which require compliance pre-approval regardless of value.

Compliance With This Policy

It is critical that Devcon Limited makes and keeps accurate books and records and maintains and devises a system of internal controls. It is important that all transactions are transparent, fully documented, and coded to accounts that accurately reflect their nature, including for Gifts and Hospitality. Devcon Limited must maintain a system of internal accounting controls to ensure its books and records have reasonable detail and accuracy. This includes the approval, representation, and documentation of all transactions in a fair and accurate manner.

Documenting Requests for Gifts and Hospitality

Gifts or Hospitality, even if approved, are intended to be infrequent in occurrence and not to give a sense of obligation to do something differently or improperly. Further, in some jurisdictions there are strict limitations on the frequency or value of a gift in a particular timeframe.

Gifts should include a letter indicating the person/organization that received the gift, the date of the gift and a description of the gift.

Payments for Gifts or Hospitality

Devcon Limited employees must not pay personally for Gifts and Hospitality to avoid complying with this Policy or for any other reason.

Payment for Hospitality should be made directly to the vendor and not to the recipient of the Hospitality.

NOTE: If paying for hospitality, Devcon Limited employees must be in attendance.

Expense Claims for Gifts or Hospitality

If the expense claim involves hospitality, the expense report shall include the location, participants, receipt and necessary approvals. It should also include sufficient evidence that the hospitality was provided for the approved reason (i.e. if it was for travel for a meeting, that there was, in fact, a meeting).

If the expense claim involves a gift, the claim shall include the recipient, occasion, or reason why the gift is being given, copy of purchase invoice and copy of necessary approvals.

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L N Pope
Managing Director
16 May 2023

Workplace Alcohol and Drugs Policy

Introduction

Devcon Limited is committed to providing a safe, healthy and productive working environment for all employees, contractors, customers and visitors involved in its operation. This policy sets out Devcon Limited's aims in preventing and managing alcohol and drug problems in the workplace.

Alcohol and drug problems are prevalent in society and are associated with a wide variety of costs for both employers and employees. These costs include ill-health sickness absence, reduced work performance and accidents. The consumption of alcohol and drugs has implications for health and safety at work since these substances impair co-ordination, judgement and decision making; as such this is a policy matter.

Policy Aim

To clearly state Devcon Limited's position on alcohol and drugs within the workplace.

Policy Objectives

- To ensure Devcon Limited complies with appropriate legislation
- To minimise the risks associated with alcohol and drugs in the workplace
- To have clear rules regarding alcohol and drugs in the workplace
- To provide employees with an education programme on the adverse health effects of alcohol and drugs
- To encourage the early identification of employees who may be experiencing alcohol or drug problems
- To provide support for employees experiencing alcohol and drug problems
- To provide training and support to line managers to ensure they are equipped to support employees experiencing problems

Definitions

- **Alcohol problem** - An alcohol problem is defined as any drinking, either intermittent or continual which interferes with a person's health and/or social functioning and/or work capability or conduct.
- **Drugs** - Any drug, whether illegal, prescribed or over the counter or solvents such as glue, butane, etc. In the case of prescribed and over the counter drugs, their possession and use by the employee is acknowledged as legitimate.
- **Drug problem** - The use of illegal drugs, the deliberate use of prescribed or over the counter drugs (when not for a medical condition) and the use of solvents, either intermittent or continual which interferes with a person's health and/or social functioning and/or work capability or conduct.

Legal

The Health and Safety at Work Act 1974 requires employers to protect the health, safety and welfare of their employees and others who may be affected by their activities, as far as is reasonably practicable.

The Management of Health and Safety at Work Regulations 1999 requires employers to carry out a risk assessment to identify hazards in the workplace and put measures in place to minimise these risks.

The Misuse of Drugs Act (1971) is the main legislation covering drugs and categorises them as classes A, B and C. These drugs are called controlled substances, and class A drugs are considered to be the most harmful under this act. It is illegal for anyone, whether at work or not to produce, supply or be in possession of illegal drugs. Employers may be liable if they knowingly allow dispensing, manufacturing, possession, using or selling on their premises.

Policy Rules

The company requires all employees to report for duty free from the effects of alcohol and drugs.

It is not acceptable to be under the influence of alcohol or drugs at work or consume alcohol or drugs during hours of work, this includes paid and un-paid breaks.

Employees found in possession of illegal drugs or using illegal drugs whilst at work will be reported to the police. In some cases the legitimate use of prescribed drugs can affect a person's ability to do their job. In such instances employees should inform their line manager.

Education

Training will be provided for managers to outline their responsibilities for enforcing this policy and additional support can be sought from the Human Resources Advisor. New managers will be made aware of their responsibilities in relation to this policy via the company induction programme.

This policy will be sent to all staff on launch and will thereafter be held on the staff intranet. New staff will be made aware of this policy at induction and will be sent a copy with their contract of employment.

Implementation of the Policy

Alcohol and drug problems may become apparent through a number of means, for example the following (particularly in combination) may result in a problem being suspected:

- Persistent short term absence
- Unauthorised absence
- Poor time keeping
- Reduced work performance
- Poor working relationships
- Deterioration in appearance

However it must be remembered that these factors can have a number of other causes. Employees experiencing alcohol or drug problems may first become apparent to their colleagues.

If a member of staff suspects an alcohol or drug problem in a colleague they should either:

- Encourage the person to seek help from support agencies:
<https://www.nhs.uk/nhs-services/find-alcohol-addiction-support-services/>
- Report the matter to a manager (particularly if the person is involved in a safety critical job).

Misconduct

This policy is primarily concerned with ongoing alcohol and drugs problems which are classed as capability issues, i.e. where the problem impacts on the person's ability to do their job.

One-off cases where the rules of this policy are breached, such as someone reporting for work clearly under the influence of alcohol or drugs or suffering from the effects of alcohol will be classed as a conduct issue and will be dealt with under the normal disciplinary procedures as outlined in the company hand book.

Very serious incidents such as violence at work whilst under the influence of alcohol or drugs or dealing illegal drugs at work will be deemed serious misconduct justifying summary dismissal.

In some instances of misconduct where the employee admits to having an alcohol or drug problem, disciplinary proceedings may be held in abeyance subject to successful outcome of treatment.

In instances of serious misconduct where the employee subsequently admits to having an alcohol or drug problem, the support route and the disciplinary route may be implemented in tandem.

Voluntary Referral for Support

Employees who suspect or know they have a drug or alcohol problem are encouraged to seek support at an early stage. Employees may or may not wish to inform their line manager in such instances.

Referral by Management

Employees suspected of having an alcohol or drug problem will be offered support by their manager.

Where the problem has become apparent through deterioration in work performance, the employee will have to demonstrate

satisfactory completion of a programme of support and an improvement in work performance or disciplinary action will be taken.

Confidentiality

The company aims to ensure that the confidentiality of all employees experiencing alcohol or drug problems is maintained by appropriate people, for example, human resources, occupational health and line manager.

Information regarding individual cases will not be divulged to third parties unless the safety of the person concerned or others would be compromised by not doing so.

Equal Opportunities

This policy will apply equally to all staff regardless of grade, experience or role within the company.

Relapse

The company acknowledges that relapse is common with alcohol and drug problems. Employees will normally be supported through two relapses after treatment. Subsequent relapses will be reviewed on a case-by-case basis, taking into account the needs of the department affected and the business needs of the organisation. Employees should be aware that the disciplinary route might be followed after subsequent relapses.

A handwritten signature in black ink, appearing to read 'L N Pope', with a horizontal line extending from the end of the signature.**L N Pope**

Managing Director

16 May 2023

Risk Management Policy

Devcon Limited's Risk Management Policy is integral to its ability to deliver its strategic objectives and business plans by ensuring that:

- the business takes informed and controlled risk based decisions within its risk appetite at all stages of the business lifecycle;
- risk management is established within the culture across all levels of the organisation;
- a standard and consistent approach for the identification, assessment, response and monitoring of risk is in place;
- Devcon Limited complies with those mandatory risk management requirements within the UK Corporate Governance Code including maintaining sound risk management and internal control systems and that emerging business critical risks are escalated in a timely manner;
- an ongoing activity to review the adequacy and effectiveness of the risk management process within the internal control environment is in place;

The Devcon Limited approach to Risk Management is to identify and assess risk in order to inform decision making around responding to risk and opportunities, limiting any adverse impact of such events and pursuing opportunities where taking risks might benefit the business. In understanding and managing risk we provide greater certainty over results and build confidence throughout our shareholders, employees, customers, suppliers and the communities in which we operate.

It is the responsibility of the Directors to:

- establish procedures to manage risk, oversee the internal control framework, and determine the nature and extent of the principal risks the company is willing to take in order to achieve its long-term strategic objectives;
- provide independent oversight of the effectiveness of risk management and associated internal control environment;
- own and provide effective management and reporting of assigned risks;
- monitor changes in the risk profile and act as the executive oversight for risk management within the business functions;
- provide specialist risk management support where required;
- ensure that effective arrangements, and management controls, to deliver the requirements of this Policy are established and implemented across the operations of the business; and
- ensure every individual in the business complies with this Policy as an integral part of their day to day duties.

This Policy will be brought to the attention of our employees, supply chain partners and relevant interested parties and reviewed on an annual basis.

A handwritten signature in blue ink, appearing to read "John Laps", written over a horizontal line.

16 May 2023

Legal Entitlement To Work In the UK Statement

Interview Prior To Offer Of Employment

All prospective Devcon employees are thoroughly vetted to ensure that they have the legal right to work in the UK.

To achieve this Devcon follows the steps as set out in the Home Office Right to Work Checklist. All applicants will be required to provide evidence of their legal right to work in the UK as is set out in this document. Only current original documents will be accepted as evidence. The Checklist is available on the company website.

Verified Documents

Devcon employs a specialist external Payroll company to manage the company's payroll. Devcon provides this company with a statement of employment which details all the information required to set the individual up on payroll and register the individual with HMRC and our pension provider. The set-up process includes copies of verified documents including passport and work visa if applicable as well as national insurance number.

Tax Code

The individual is set up on Payroll and is issued an employee number and Tax code. Payroll generates a payslip each month and monthly salary is deposited electronically into the employee's account.

A handwritten signature in black ink, appearing to read "L N Pope", is written over a horizontal line.

L N Pope

Managing Director

16 May 2023

Construction Products Regulations

All products or materials specified on Devcon sites are checked to ensure that they comply with UK Construction Products Regulations. The CE mark will continue to be recognised until 30 June 2025 and thereafter only the UKCA mark will apply.

The UK mark should be followed by:

- the two last digits of the year in which it was first affixed
- the name and the registered address of the manufacturer, or the identifying mark allowing identification of the name and address of the manufacturer
- the unique identification code of the product-type
- the reference number of the declaration of performance
- the level or class of the performance declared
- the reference to the harmonised technical specification applied
- the identification number of the approved body, if applicable, and the intended use as laid down in the harmonised technical specification applied.

Only products confirmed to contain the above information as proof of certification will be specified.

A handwritten signature in black ink, appearing to read "L N Pope", written over a horizontal line.

L N Pope
Managing Director
16 May 2023



Legal Right to Work in the UK Statement

Ensuring Legal Right to Work in the UK follows 3 stages

Stage 1 – Interview - Prior to offer of employment

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Stage 2

Devcon employs a specialist external Payroll company to manage the company's payroll. Devcon provides this company with a statement of employment which details all the information required to set the individual up on payroll and register the individual with HMRC and our pension provider. The set-up process includes copies of verified documents including passport and work visa if applicable as well as national insurance number.

Stage 3

The individual is set up on Payroll and is issued an employee number and Tax code. Payroll generates a payslip each month and monthly salary is deposited electronically into the employee's account.

A handwritten signature in black ink, appearing to read "L N Pope". The signature is written in a cursive style with a large loop at the top.

L N Pope

Managing Director

16 May 2023