

## **Ethical Code of Practice**

<b>Child Labour</b>	<b>6</b>
<b>Anti-Bribery Policy</b>	<b>7</b>
<b>Anti-Tax Evasion Policy</b>	<b>10</b>
<b>Whistle-Blowing Procedure</b>	<b>12</b>
<b>Equality &amp; Diversity Policy</b>	<b>13</b>
<b>Personal Harassment Policy and Procedure</b>	<b>16</b>
<b>Environmental Management – Statement of Intent</b>	<b>20</b>

# Ethical Conduct Policy

---

At Delron Services Ltd we are committed to doing the right thing in all aspects of our business. This requires that every day everyone working for us needs to have an unwavering dedication to the highest ethical standards. It is fundamental that every employee and worker carries a share of the responsibility for our conduct and contributes to our success.

Our culture is built on four key values. These shape our behaviour toward customers and toward one another. Together, they drive our organisation forward. The values are:

## **INTEGRITY**

We demand of each other and ourselves the highest standards of individual and corporate integrity. We do the right thing, because it is the right thing to do. It is every employee's responsibility to safeguard organisation assets and foster an environment of trust with our workers, customers, communities and suppliers. We should always comply with all our organisation policies, meet legal requirements, and create an environment of transparency in which all reporting requirements are met.

## **EXCELLENCE**

We routinely challenge ourselves to improve our products, services and processes. We strive always to understand our customers' businesses and help them achieve their goals. We serve our customers by anticipating and responding to their needs. We are dedicated to diversity, fair treatment, mutual respect and trust. We are committed to serving our customers with zero harm to people and the environment.

## **TEAMWORK**

We foster an environment that encourages innovation and creativity, and delivers results through collaboration. We practice leadership that teaches, inspires and promotes full participation and career development. We encourage open and effective communications and interaction with all workers and stakeholders, actively working together to keep each other safe and in good health. We believe that none of us is as capable or effective as all of us – and together, there's no limit to what we can achieve.

## **ACCOUNTABILITY**

We honour the commitments we make and take personal responsibility for all actions and results. Our actions match our words, and we demand responsibility – from ourselves and others – in everything we do. We operate on the basis that continuous improvement is an integral part of our culture.

Regardless of our position within the organisation, we share equal accountability for:

- Conducting business with integrity, preserving our strong reputation and expanding our position in the marketplace.
- Fostering an inclusive culture in which we all feel respected and have the opportunity to reach our full potential.
- Providing a healthy and safe work environment, and complying with applicable environmental laws and regulations wherever we operate contributing to the sustainability of the communities in which we live and work.

# Modern Slavery Statement

---

## A) ORGANISATION

This statement applies to Delron Services Ltd (referred to in this statement as ‘the Organisation’). The information included in the statement refers to the financial year 1<sup>st</sup> March 2022 to 28<sup>th</sup> February 2023.

## B) ORGANISATIONAL STRUCTURE

DSL is a building engineering services contractor operating mainly within the South East of England from our offices in Maidstone, Kent, although we do go further afield, within the UK, for certain contract clients. The limited geographical scope of our business enables us to ensure optimum control and supervision of the work environment.

The business is controlled by a Board of Directors.

DSL offers a broad portfolio of services to our clients: Design and installation, service and maintenance of sustainable building services solutions, commercial heating and plumbing, electrical engineering and controls, refrigeration and air conditioning, biogas and utilities engineering, and mechanical services.

The labour supplied to DSL in pursuance of its operation is wholly carried out in the UK.

## C) DEFINITIONS

The Organisation considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

## D) COMMITMENT

DSL acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. We understand that this requires an ongoing review of both our internal practices in relation to our labour force and, additionally, our supply chains.

DSL does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour. No labour provided to DSL in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. We strictly adhere to the minimum standards required in relation to our responsibilities under relevant employment legislation in the UK, and in many cases exceeds those minimums in relation to our employees.

## E) SUPPLY CHAINS

In order to fulfil its activities, the Organisation’s main supply chains include those related to the supply of building services parts. As part of our initiative to identify and mitigate risk, where possible, we build long standing relationships with local suppliers and make clear our expectations of business behaviour. We operate an approved supplier list for purchasing and this is adhered to wherever possible. Any deviation from approved suppliers must be authorised by a director.

A large majority of our approved suppliers are large national and multi-national companies, who have their own Ethical Codes of Practice. For smaller suppliers and subcontractors, we ask that they adopt/work under our Ethical Code of Practice.

#### **F) POTENTIAL EXPOSURE**

The Board considers its main exposure to the risk of slavery and human trafficking to exist in the use of labour agencies, as we are not in control of the background screening of the operatives supplied. Consequently, we have implemented a policy of only using two highly reputable global agencies, both of whom are on our approved supplier list, and with whom we have a long-standing business relationship.

In general, the DSL considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

#### **G) IMPACT OF COVID-19**

DSL concludes that the COVID-19 pandemic did not increase the risk of modern slavery to a level above that which existed before the pandemic, which is as set out under 'POTENTIAL EXPOSURE' above.

#### **H) STEPS**

DSL carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

DSL has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, we have taken the following steps to ensure that modern slavery is not taking place:

- Regular review of approved suppliers including checking for Modern Slavery Statement. Smaller local companies will be asked to abide by the provisions of our statement.
- All of our staff are trained in our Ethical Code of Practice annually, including our zero-tolerance policy towards modern slavery.

#### **I) KEY PERFORMANCE INDICATORS**

We will know that the steps we have taken are successful in ensuring that there is no slavery or human trafficking in our supply chain if we do not receive any reports from employees, the public or law enforcement agencies to indicate that such practices have been identified.

#### **J) POLICIES**

DSL has the following policies which further define its stance on modern slavery: Recruitment Policy, Whistle Blowing Policy, Ethical Conduct Policy and Agency Workers Policy.

#### **K) TRAINING**

DSL provides the following training to staff to effectively implement its stance on modern slavery: induction training followed by annual refresher training on Ethical Code of Practice including Modern Slavery.

**L) SLAVERY COMPLIANCE OFFICER**

DSL has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisation obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

# Child Labour

---

The Company will ensure that all relevant legislation and restrictions are adhered to in regards to the use of young workers. We will ensure that the necessary checks are carried out to verify an individual's age and right to work, and that relevant Health and Safety codes are adhered to.

Where required, the Company will ensure that the relevant employment permit is received from the education department of the local council.

We will also carry out spot checks when required and will retain copies of age records within the place of work.

## **RESTRICTIONS FOR CHILDREN AGED 14 YEARS OLD**

There are restrictions that apply to the employment of children aged 14 years old, as follows:-

- You must not work before 7.00 am. or after 7.00 pm. on any day;
- You must not work for more than 2 hours on any day when you are required to be at school;
- You must not work during school hours;
- You must not work for more than 5 hours on a Saturday or on weekdays during school holidays;
- You must not work for more than 2 hours on a Sunday;
- You must not work for more than 4 hours in any day without a rest break of 1 hour.
- You must not work for more than 12 hours in any school week; and
- You must not work for more than 25 hours a week during school holidays.

## **RESTRICTIONS FOR CHILDREN AGED 15 AND 16 YEARS OLD**

There are restrictions that apply to the employment of children aged 15 and 16 years old, as follows:-

- You must not work before 7.00 am. or after 7.00 pm. on any day;
- You must not work for more than 2 hours on any day when you are required to be at school;
- You must not work during school hours;
- You must not work for more than 8 hours on a Saturday or on weekdays during school holidays;
- You must not work for more than 2 hours on a Sunday;
- You must not work for more than 4 hours in any day without a rest break of 1 hour.
- You must not work for more than 12 hours in any school week; and
- You must not work for more than 35 hours a week during school holidays.

## **RESTRICTIONS FOR YOUNG WORKERS OVER COMPULSORY SCHOOL LEAVERS AGE**

There are restrictions that apply to the employment of young workers over compulsory school leaver's age, as follows:-

- You must not work for more than 8 hours a day;
- You must not work for more than 40 hours a week;
- You must not work for more than 4.5 hours in any day without a rest break of 30 minutes.
- You must have a rest period of not less than 48 hours in each seven day period.

# Anti-Bribery Policy

---

## A) INTRODUCTION

Bribery is, in the conduct of the organisation's business, the offering or accepting of any gift, loan, payment, reward or advantage for personal gain as an encouragement to do something which is dishonest, illegal or a breach of trust.

Bribery is a criminal offence. The Organisation prohibits any form of bribery. We require compliance, from everyone connected with our business, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to us and we have a zero tolerance attitude towards corrupt activities of any kind, whether committed by Delron Services Ltd employees or by third parties acting for or on behalf of Delron Services Ltd.

**Any cases of Bribery will be reported to the relevant authority (e.g. Police).**

## B) OFFENCES

It is a criminal offence to:

- offer a bribe;
- accept a bribe;
- bribe a foreign official;
- as a commercial organisation, to fail to prevent a bribe.

You should be aware that if you are found guilty by a court of committing bribery, you could face up to 10 years in prison and/or an unlimited fine. The Organisation could also face prosecution and be liable to pay a fine.

## C) PURPOSE

The purpose of this policy is to convey to all employees and interested parties of Delron Services Ltd the rules of the Organisation in relation to our unequivocal stance towards the eradication of bribery and our commitment to ensuring that Delron Services Ltd conducts its business in a fair, professional and legal manner.

## D) DEFINITIONS OF BRIBERY AND CORRUPTION

Corruption is the misuse of office or power for private gain. Bribery is a form of corruption which means in the course of business:

- Giving or receiving money, gifts, meals, entertainment or anything else of value.
- As an inducement to a person to do something which is dishonest or illegal.

## E) SCOPE

This policy applies to all employees of Delron Services Ltd regardless of seniority or site. It also extends to anyone working for or on our behalf e.g. those engaged by us on a self-employed basis or an agency arrangement.

We will encourage the application of this policy where our business involves the use of third parties e.g. suppliers; contractors.

## **F) POLICY**

It is prohibited, directly or indirectly, to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or organisation in order to gain commercial, contractual or regulatory advantage for the Organisation, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

It is also prohibited to act in the above manner in order to influence an individual in his capacity as a foreign public official. You should not make a payment to a third party on behalf of a foreign public official.

If you are offered a bribe, or a bribe is solicited from you, you should not agree to it unless your immediate safety is in jeopardy. You should immediately contact your Line Manager so that action can be taken if considered necessary. You may be asked to give a written account of events.

If you, as an employee or person working on our behalf, suspect that an act of bribery, or attempted bribery, has taken place, even if you are not personally involved, you are expected to report this to your Line Manager. You may be asked to give a written account of events.

Appropriate checks will be made before engaging with suppliers or other third parties of any kind to reduce the risk of our business partners breaching our anti-bribery rules.

The Organisation will ensure that all of its transactions, including any sponsorship or donations given to charity, are made transparently and legitimately.

Delron Services Ltd takes any actual or suspected breach of this policy extremely seriously and will carry out a thorough investigation should any instances arise.

We will uphold laws relating to bribery and will take disciplinary action against any employee, or other relevant action against persons working on our behalf or in connection with us, should we find that an act of bribery, or attempted bribery, has taken place. This action may result in your dismissal if you are an employee, or the cessation of our arrangement with you if you are self-employed, an agency worker, contractor etc.

Staff are reminded of the Organisation's Whistleblowing Policy which can be found within this Ethical Code of Practice, or upon request.

## **G) GIFTS AND HOSPITALITY**

We realise that the giving and receiving of gifts and hospitality where nothing is expected in return helps form positive relationships with third parties where it is proportionate and properly recorded. This does not constitute bribery and consequently such actions are not considered a breach of this policy.

*Gifts* include money; goods (flowers, vouchers, food, drink, event tickets when not used in a hosted business context); services or loans given or received as a mark of friendship or appreciation.

*Hospitality* includes entertaining; meals or event tickets (when used in a hosted business context) given or received to initiate or develop relations. Hospitality will become a gift if the host is not present.





No gift should be given nor hospitality offered by an employee or anyone working on our behalf to any party in connection with our business without receiving prior written approval from your Line Manager. Similarly, no gift nor offer of hospitality should be accepted by an employee or anyone working on our behalf without receiving prior written approval from your Line Manager.

A record will be made of every instance in which gifts or hospitality are given or received.

As the law is constantly changing, this policy is subject to review and the Organisation reserves the right to amend this policy without prior notice.

# Anti-Tax Evasion Policy

---

## A) INTRODUCTION

Tax evasion is a criminal offence. The Organisation prohibits any form of tax evasion. Involvement in the criminal facilitation of tax evasion exposes the Organisation and the person facilitating the evasion to a criminal offence. It will also damage our reputation and the confidence of our customers, suppliers and business partners.

Indicators of tax evasion are:-

- a) request for payment by cash;
- b) overly-complex payment mechanisms;
- c) services/goods provided to jurisdictions that do not subscribe to Common Reporting Standards;
- d) transactions involving overly complex supply chains;
- e) transactions involving private banking facilities; and/or
- f) records are incomplete or missing.

Our position is simple: we conduct our business to the highest legal and ethical standards. We will not be party to tax evasion or the facilitation of tax evasion of any form. Such acts would damage our reputation and expose us, and our staff and representatives, to the risk of fines and imprisonment.

We take a zero-tolerance approach to tax evasion facilitation by our people and our third party representatives. We are committed to:

- a) rejecting the facilitation of tax evasion; and
- b) not recommending the services of others who do not have reasonable prevention procedures in place.

We require compliance in regards to this from everyone connected with our business. Integrity and transparency are of utmost importance to us.

## B) DEFINITIONS OF TAX EVASION

Tax evasion is the practice of using illegal methods to avoid paying tax. It frequently involves contrived, artificial transactions that serve no purpose other than to reduce tax liability.

## C) POLICY

It is prohibited, directly or indirectly, for any employee or person working on our behalf to take part in any activity relating to tax evasion.

If we suspect that you have taken part in such activity, an investigation will be carried out and, in line with our disciplinary procedure where appropriate, action may be taken against you which may result in your dismissal, or the cessation of our business arrangement with you.



If you, as an employee or person working on our behalf, suspect any activity related to tax evasion or attempted tax evasion has taken place, even if you are not personally involved, you are expected to report this to your Line Manager. You may be asked to give a written account of events.

**D) TRAINING/MONITORING/REVIEW**

The Organisation will ensure that it gives all relevant training for staff in relation to financial crime detection and prevention, it will ensure it monitors and enforces compliance with the prevention procedures and regularly review the effectiveness of prevention procedures, refining them where necessary.

**E) CONCERNS**

Staff are reminded of the Organisation's Whistleblowing policy which is available in the Employee Handbook, or upon request.

# Whistle-Blowing Procedure

---

## A) INTRODUCTION

Under certain circumstances, employees are protected from suffering any detriment or termination of employment if they make disclosures about organisations for whom they work.

## B) QUALIFYING DISCLOSURES

- 1) Certain disclosures are prescribed by law as “qualifying disclosures”. A “qualifying disclosure” means a disclosure of information that the employee genuinely and reasonably believes is in the public interest and shows that the Organisation has committed a “relevant failure” by:
  - a) committing a criminal offence;
  - b) failing to comply with a legal obligation;
  - c) a miscarriage of justice;
  - d) endangering the health and safety of an individual;
  - e) environmental damage; or
  - f) concealing any information relating to the above.
- 2) These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. The Organisation will take any concerns that you may raise relating to the above matters very seriously.
- 3) The Employment Rights Act 1996 provides protection for workers who ‘blow the whistle’ where they reasonably believe that some form of illegality, injustice or breach of health and safety has occurred or is likely to occur. The disclosure has to be “in the public interest”. We encourage you to use the procedure to raise any such concerns.

## C) THE PROCEDURE

- 1) In the first instance you should report any concerns you may have to your Line Manager who will treat the matter with complete confidence. If you are not satisfied with the explanation or reason given to you, you should raise the matter with the appropriate official organisation or regulatory body.
- 2) If you do not report your concerns to your Line Manager you should take them direct to the appropriate organisation or body. (e.g. <https://protect-advice.org.uk/>)

## D) TREATMENT BY OTHERS

Bullying, harassment or any other detrimental treatment afforded to a colleague who has made a qualifying disclosure is unacceptable. Anyone found to have acted in such a manner will be subject to disciplinary action.

# Equality & Diversity Policy

---

## **A) INTRODUCTION**

- 1) We are an equal opportunities employer. We are committed to equality of opportunity and to providing a service and following practices which are free from unfair and unlawful discrimination. The aim of this policy is to ensure that no applicant or member of staff receives less favourable treatment on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation, or is disadvantaged by conditions or requirements which cannot be shown to be relevant to performance. It seeks also to ensure that no person is victimised or subjected to any form of bullying or harassment.
- 2) We value people as individuals with diverse opinions, cultures, lifestyles and circumstances. All employees are covered by this policy and it applies to all areas of employment including recruitment, selection, training, deployment, career development, and promotion. These areas are monitored and policies and practices are amended if necessary to ensure that no unfair or unlawful discrimination, intentional, unintentional, direct or indirect, overt or latent exists.
- 3) Your Line Manager has particular responsibility for implementing and monitoring the Equality and Diversity in Employment Policy and, as part of this process, all personnel policies and procedures are administered with the objective of promoting equality of opportunity and eliminating unfair or unlawful discrimination.
- 4) All employees, workers or self-employed contractors whether part time, full time or temporary, will be treated fairly and with respect. Selection for employment, promotion, training, or any other benefit will be on the basis of aptitude and ability. All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the Organisation.
- 5) Equality of opportunity, valuing diversity and compliance with the law is to the benefit of all individuals in our Organisation as it seeks to develop the skills and abilities of its people. While specific responsibility for eliminating discrimination and providing equality of opportunity lies with managers and supervisors, individuals at all levels have a responsibility to treat others with dignity and respect. The personal commitment of every employee to this policy and application of its principles are essential to eliminate discrimination and provide equality throughout the Organisation.

## **B) OUR COMMITMENT AS AN EMPLOYER**

- 1) To create an environment in which individual differences and the contributions of our staff are recognised and valued.
- 2) Every employee, worker or self-employed contractor is entitled to a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.
- 3) Training, development and progression opportunities are available to all staff.
- 4) Equality in the workplace is good management practice and makes sound business sense.
- 5) We will review all our employment practices and procedures to ensure fairness.

## **C) OUR COMMITMENT AS A SERVICE PROVIDER**

- 1) We aim to provide services to which all clients are entitled regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation, offending past, caring responsibilities or social class.
- 2) We will make sure that our services are delivered equally and meet the diverse needs of our service users and clients by assessing and meeting the diverse needs of our clients.
- 3) This policy is fully supported by senior management and has been agreed with employee representatives
- 4) This policy will be monitored and reviewed annually.
- 5) We have clear procedures that enable our clients, candidates for jobs and employees to raise a grievance or make a complaint if they feel they have been unfairly treated.
- 6) Breaches of our equality and diversity policy will be regarded as misconduct and could lead to disciplinary proceedings.

## **D) POLICY STATEMENTS**

### **AGE**

We will:

- ensure that people of all ages are treated with respect and dignity;
- ensure that people of working age are given equal access to our employment, training, development and promotion opportunities; and
- challenge discriminatory assumptions about younger and older people.

### **DISABILITY**

We will:

- provide any reasonable adjustments to ensure disabled people have access to our services and employment opportunities;
- challenge discriminatory assumptions about disabled people; and
- seek to continue to improve access to information by ensuring availability of loop systems, braille facilities, alternative formatting and sign language interpretation.

### **RACE**

We will:

- challenge racism wherever it occurs;
- respond swiftly and sensitively to racists incidents; and
- actively promote race equality in the Organisation.

### **GENDER**

We will:

- challenge discriminatory assumptions about women and men;
- take positive action to redress the negative effects of discrimination against women and men;
- offer equal access for women and men to representation, services, employment, training and pay and encourage other organisations to do the same; and

- provide support to prevent discrimination against transsexual people who have or who are about to undergo gender reassignment.

#### **SEXUAL ORIENTATION**

We will:

- ensure that we take account of the needs of lesbians, gay men and bisexuals; and
- promote positive images of lesbians, gay men and bisexuals.

#### **RELIGION OR BELIEF**

We will:

- ensure that employees' religion or beliefs and related observances are respected and accommodated wherever possible; and
- respect people's beliefs where the expression of those beliefs does not impinge on the legitimate rights of others.

#### **PREGNANCY OR MATERNITY**

We will:

- Ensure that people are treated with respect and dignity and that a positive image is promoted regardless of pregnancy or maternity;
- challenge discriminatory assumptions about the pregnancy or maternity of our employees; and
- ensure that no individual is disadvantaged and that we take account of the needs of our employees' pregnancy or maternity.

#### **MARRIAGE OR CIVIL PARTNERSHIP**

We will:

- Ensure that people are treated with respect and dignity and that a positive image is promoted regardless of marriage or civil partnership;
- challenge discriminatory assumptions about the marriage or civil partnership of our employees; and
- ensure that no individual is disadvantaged and that we take account the needs of our employees' marriage or civil partnership.

#### **EX-OFFENDERS**

We will:

- prevent discrimination against our employees regardless of their offending background (except where there is a known risk to children or vulnerable adults).

#### **EQUAL PAY**

We will:

- ensure that all employees, male or female, have the right to the same contractual pay and benefits for carrying out the same work, work rated as equivalent work or work of equal value.

# Personal Harassment Policy and Procedure

---

## A) INTRODUCTION

- 1) Harassment or victimisation on the grounds of the following protected characteristic: age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation is unacceptable.
- 2) Personal harassment takes many forms but whatever form it takes, it is unlawful under the Equality Act 2010 and will not be tolerated.
- 3) This policy will be reviewed regularly to ensure it remains up to date and in order to monitor its effectiveness.

## B) SCOPE

We deplore all forms of personal harassment and seek to ensure that the working environment is sympathetic to all those who work for us. This includes employees, workers, agency workers, volunteers and contractors in all areas of our Company, including any overseas sites.

## C) DEFINITIONS

### Harassment

This is unwanted conduct related to a relevant protected characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person.

Unwanted conduct can include:

- a) spoken words
- b) banter
- c) written words
- d) posts or contact on social media
- e) imagery
- f) graffiti
- g) physical gestures
- h) facial expressions
- i) mimicry
- j) jokes or pranks
- k) acts affecting a person's surroundings
- l) aggression, and
- m) physical behaviour towards a person or their property.

### Sexual harassment

This is unwanted conduct of a sexual nature which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person.

- a) sexual comments or jokes
- b) displaying sexually graphic pictures, posters or photos
- c) suggestive looks, staring or leering
- d) propositions and sexual advances
- e) making promises in return for sexual favours
- f) sexual gestures
- g) intrusive questions about a person's private or sex life or a person discussing their own sex life



- h) sexual posts or contact on social media
- i) spreading sexual rumours about a person
- j) sending sexually explicit emails or text messages, and
- k) unwelcome touching, hugging, massaging or kissing.

**Less favourable treatment for rejecting or submitting to unwanted conduct**

This occurs when:

- a) someone is subjected to unwanted conduct:
  - i) of a sexual nature
  - ii) related to sex, or
  - iii) related to gender reassignment
- b) the unwanted conduct has the purpose or effect of:
  - i) violating their dignity, or
  - ii) creating an intimidating, hostile degrading, humiliating or offensive environment for them, and
- c) they are treated less favourably because they submitted to, or rejected the unwanted conduct.

**D) CIRCUMSTANCES WHICH ARE COVERED**

1) This policy covers behaviour which occurs in the following situations:

- a) a work situation
- b) a situation occurring outside of the normal workplace or normal working hours which is related to work, for example, a working lunch or social event with colleagues;
- c) outside of a work situation but against a colleague or other person connected to the Company, including on social media;
- d) against anyone outside of a work situation where the incident is relevant to their suitability to carry out the role.

**E) COMPLAINING ABOUT PERSONAL HARASSMENT**

**1) Informal complaint**

We recognise that complaints of personal harassment, and particularly of sexual harassment, can sometimes be of a sensitive or intimate nature and that it may not be appropriate for you to raise the issue through our normal grievance procedure. In these circumstances you are encouraged to raise such issues with a senior colleague of your choice (whether or not that person has a direct supervisory responsibility for you) as a confidential helper. This person cannot be [Senior Manager] who will be responsible for investigating the matter if it becomes a formal complaint.

If you are the victim of minor harassment you should make it clear to the harasser on an informal basis that their behaviour is unwelcome and ask the harasser to stop. If you feel unable to do this verbally then you should hand a written request to the harasser, and your confidential helper can assist you in this.

## 2) Formal complaint

Where the informal approach fails or if the harassment is more serious, you should bring the matter to the attention of [Senior Manager] as a formal written complaint and again your confidential helper can assist you in this. If possible, you should keep notes of the harassment so that the written complaint can include:

- a) the name of the alleged harasser;
- b) the nature of the alleged harassment;
- c) the dates and times when the alleged harassment occurred;
- d) the names of any witnesses; and
- e) any action already taken by you to stop the alleged harassment.

On receipt of a formal complaint we will take action to separate you from the alleged harasser to enable an uninterrupted investigation to take place. This may involve a temporary transfer of the alleged harasser to another work area or suspension with contractual pay until the matter has been resolved.

The person dealing with the complaint will invite you to attend a meeting, at a reasonable time and location, to discuss the matter and carry out a thorough investigation. You have the right to be accompanied at such a meeting by your confidential helper or another work colleague of your choice and you must take all reasonable steps to attend. Those involved in the investigation will be expected to act in confidence and any breach of confidence will be a disciplinary matter.

On conclusion of the investigation, which will normally be within ten working days of the meeting with you, the decision of the investigator, detailing the findings, will be sent in writing to you.

You have the right to appeal against the findings of the investigator in accordance with the appeal provisions of the grievance procedure.

### F) DISCIPLINARY ACTION

- 1) If the decision is that the allegation is well founded, the harasser will be liable to disciplinary action in accordance with our disciplinary procedure. An employee who receives a formal warning or who is dismissed for harassment may appeal by using our capability/disciplinary appeal procedure.
- 2) When deciding on the level of disciplinary sanction to be applied, we will take into consideration aggravating factors such as abuse of power over a more junior colleague.
- 3) If you bring a complaint of harassment you will not be victimised for having brought the complaint. However if it is concluded that the complaint is both untrue and has been brought with malicious intent, disciplinary action will be taken against you.

### G) THIRD PARTY HARASSMENT

- 1) Third party harassment occurs when one of our workforce is subjected to harassment by someone who is not part of our workforce but who is encountered in connection with work. This includes our customers, suppliers, members of the public. Third party harassment of our workforce will not be tolerated.
- 2) In order to prevent third party harassment from occurring, we have the following in place:



Should a customer harass a member of our workforce, they will be warned that continued provision of our service to them will cease if they are to act in a similar way again. Should their behaviour recur, they will be informed that our service to them will cease.

Should a supplier/subcontractor harass a member of our workforce, they will be warned that they will be struck off our Approved Supplier List if they are to act in a similar way again. Should their behaviour recur, they will be informed that our purchasing from them will cease.

Any criminal acts will be reported to the police.

## Environmental Management – Statement of Intent

---

Delron Services Ltd (DSL) accepts its environmental responsibilities and recognises its obligations to contribute to the resolution of global and local environmental issues by controlling and reducing its environmental impacts and by taking a leading role in promoting environmental good practice.

Therefore, Delron Services Ltd will:

- Endeavour to protect the environment, preventing pollution wherever practical, possible or mandatory.
- Comply with all relevant current and future legislation, regulation and industry codes of practice.
- Continually seek to improve its environmental performance by all reasonably practicable means.
- Include environmental issues within the core routine of management planning and review, defining and monitoring objectives for improvement which align with environmental aspects and business strategy.
- Quantify and reduce its environmental impacts, bearing in mind the whole life cycles of energy and material supplies.
- Integrate environmental concerns into all building services installation and maintenance decisions, including sustainable development principles where possible.
- Minimise the environmental impact of new buildings during their construction and use.
- Minimise noise on site and reduce and/or limit the discharge of pollutants to water, land and air, and only then with the correct permits in place.
- Improve resource efficiency by minimising waste, and conserving energy and natural resources, using recyclable and renewable products whenever possible.
- Seek to use the most environmentally efficient method of transport.
- Use on registered waste disposal companies (Delron Services Ltd is a licenced waste carrier).
- Foster environmental awareness and understanding in our customers, suppliers and subcontractors.
- Ensure that the policy is read and understood by all employees.
- Improve staff environmental awareness and understanding, encouraging all employees to apply the environmental values that they develop in their work, in the wider community.

These commitments will be demonstrated through the implementation of suitable procedures, practices and programmes. Their effectiveness will be monitored by evaluating the company's environmental performance, thereby encouraging efforts to comply with the Environmental Policy.

The person named below has overall responsibility for overseeing all issues relating to business management. The principles outlined within this environmental policy will be communicated, understood and applied throughout DSL. This statement will be provided to external interested parties upon request and shall be subject to annual review to ensure its ongoing adequacy for the business.

**Ronald Bryant**  
Managing Director  
September 2023

(Review by 01/09/2024)