



***COMPANY KEY
POLICIES
HANDBOOK***

CONTENTS

INTRODUCTION

GENERAL COMPANY WIDE POLICIES:

- QUALITY POLICY STATEMENT (INTEGRATED POLICY)
- ENVIRONMENTAL POLICY STATEMENT (INTEGRATED POLICY)
- HEALTH & SAFETY POLICY STATEMENT (INTEGRATED POLICY)
- CORPORATE SOCIAL RESPONSIBILITY POLICY
- WASTE MINIMISATION AND SUSTAINABILITY POLICY STATEMENT
- EQUAL OPPORTUNITIES POLICY (INCLUDING DIVERSITY & INCLUSION)
- ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY (IN COMPLIANCE WITH MODERN SLAVERY ACT 2015)
- DISCIPLINARY POLICY
- GRIEVANCE POLICY
- INFORMATION SECURITY POLICY
- ANTI-BRIBERY POLICY (IN COMPLIANCE WITH THE BRIBERY ACT 2010)
- DATA PRIVACY POLICY (IN COMPLIANCE WITH DATA PROTECTION ACT 2018 AND THE GENERAL DATA PROTECTION REGULATION (GDPR))
- DRUG & ALCOHOL POLICY
- COMPANY CAR POLICY
- REFUSAL TO WORK ON GROUNDS OF H&S
- MENTAL HEALTH & WELL BEING POLICY
- ANTI-HARASSMENT, BULLYING & SEXUAL POLICY
- CORPORATE CRIMINAL OFFENSES POLICY
- ETHICS POLICY
- WHISTLEBLOWING POLICY
- CONFIDENTIAL REPORTING POLICY

INTRODUCTION

This handbook has been compiled for Frontline Construction Recruitment Ltd (known herein as “The Company”) to give a broad, but focused overview of both company and employee responsibilities related to Quality, Health & Safety, the Environment and other essential employment law criteria. Its purpose is to give the company employees/workers/temporary workers/contractors and sub-contractors a greater awareness of these key issues to create a safer working environment for all. Please note that for the Health and Safety elements it does not supersede the main Health & Safety Policy document held by the company, it supplements it.

The company commits to communicate these key company policies to all associated Internal and External Interested Parties. Internal Interested Parties will be issued with this Policy Handbook upon induction and policies displayed throughout the depots.

The company will issue a copy of this “Company Key Policies Handbook” to any External Interested parties if required upon request.

All policies contained within are non-contractual.

HEALTH & SAFETY

It is the policy of the company to comply with the terms of the Health and Safety at Work Act 1974 and related legislation and to provide and maintain a healthy and safe working environment. The company health and safety objective is to minimise the number of instances of occupational accidents and illnesses and ultimately to achieve an accident-free workplace.

The company is committed to implementing this policy statement through its internal management systems, all associated procedures and practices in all aspects of our business scope of activities. We are committed to attainment of company and client requirements, and recognise that continually improving our performance is a key factor in our continuing business success. We ensure that the appropriate procedures cover all applicable environmental, quality, and health and safety areas of our business and our operations.

While the management of the company will do all that is within its powers to ensure the health and safety of its employees, it is recognised that health and safety at work is the responsibility of each and every individual associated with the company. It is the duty of each employee to take reasonable care of their own and other people's welfare and to report any situation which may pose a threat to the well being of any other person.

An effective health and safety programme requires continuous communication between employees at all levels. It is therefore every employee's responsibility to report immediately any situation which could jeopardise the well being of themselves or any other person.

We as a company have a commitment to Health & Safety and confirm we shall:

- Ensure good H&S practices throughout the business so far as is reasonably practicable.
- All employees will be provided with such equipment, information, training and supervision as is necessary to implement the policy and achieve the company's annual improvements plan (H&S objectives).
- Allocate appropriate finance and resource where appropriate to improve H&S throughout the business through compliance monitoring.
- Report all RIDDOR categorised accidents, incidents, near misses or dangerous occurrences and all close-calls for railway working.
- Protect the health and safety of all visitors to the company, including contractors and temporary employees, as well as any members of the public who might be affected by our operations.
- Provide every employee with the training necessary to carry out their tasks safely.
- Providing sufficient resources for the management of Health & Safety.
- Setting & monitoring safety objectives through the company's annual improvements plan.
- Aim to continually improve our safety performance through compliance monitoring and feedback.
- Aim to identify safe behaviours and re-educating personnel on any un-safe behaviours

ENVIRONMENTAL

The company is committed to the preservation of the environment by monitoring and minimising the impact of our activities. By developing our understanding of our impacts and by the setting of objectives, we will strive to continuously improve our environmental performance with the aim of minimising consumption and waste.

The company will operate in compliance with all relevant existing and future environmental laws, regulations and associated codes of practice. This will be applicable to all regions in which we operate.

We are committed to maintain effective communication systems on environmental matters, and we will respond positively to enquiries and suggestions from both inside and outside the company.

We have a responsibility to the company and both our employees and the local community to maintain a safe environment and to operate in a sustainable manner, and as such we will respect our legal and ethical responsibilities through the use of appropriate training and learning

We as a company have a commitment to the Environment and we shall:

- Preventing pollution by every means possible.
- Protect the environment as much as we possibly can for all aspects of our work activities.
- Monitor and try to reduce environmentally significant aspects / impacts.
- Specifically minimise the environmental impact for the life cycle (including disposal) of any plant and/or equipment and other physical assets.
- Setting & monitoring environmental objectives through the company's annual improvements plan.
- Limit the environmental impact of its activities by waste and material handling, and reduction methods.
- Record, monitor and publish, if required, statistics related to environmental improvement target achievement.
- Continually improve our environmental performance through the company's annual improvements plan (Environmental Objectives).

QUALITY

The company is committed to the implementation and on-going improvement of our Quality System standards disciplines and to the involvement of all staff in the continual maintenance of the high standards of customer service provided by the company.

We as a Company have a commitment to Quality and confirm we shall:

- Implement and maintain an effective set of quality procedures that comply with ISO 9001.
- Setting and continually monitor / review our quality objectives through use of the company's annual improvements plan.
- Achieve continual improvement by regularly reviewing and evaluating our services supplied to meet client requirements.
- A commitment to work with suppliers & customers to establish & maintain the highest quality standards.
- A commitment to continual improvement in quality performance through the company's annual improvements plan.

Compliance to this combined policy is mandatory for all staff and only director approved deviances will be allowed.

The company recognises that the procedures in conjunction with this integrated policy statement which itself is an expression of the commitment of the company to environmental protection, quality throughout all business operations, and protecting the health & safety of all staff, as basic management responsibilities.

The SHEQ manual and associated work records define the processes implemented, to ensure compliance with both the company's quality and legislative requirements & the British Standards



The policy will be reviewed and if required updated every 12 months unless legislative changes necessitate more frequent changes. The specific arrangements for the implementation of this policy and the personnel responsible are detailed in the management review procedure for the company.

Signed: 

Date: January 2026

Printed: Paul Edwards

Position: Director

CORPORATE SOCIAL RESPONSIBILITY POLICY

We recognise that we must integrate our business values and operations to meet the expectations of our stakeholders. They include customers, employees, regulators, investors, suppliers, the community and the environment.

- We recognise that our social, economic and environmental responsibilities to these stakeholders and Interested Parties are integral to our business. We aim to demonstrate these responsibilities through our actions and within our corporate policies.
- We take seriously all feedback that we receive from our stakeholders and, where possible, maintain open dialogue to ensure that we fulfil the requirements outlined within this policy.
- We shall be open and honest in communicating our strategies, targets, performance and governance to our stakeholders in our continual commitment to sustainable development.
- The Managing Director is responsible for the implementation of this policy and will make the necessary resources available to realise our corporate responsibilities. The responsibility for our performance to this policy rests with all employees throughout the company.
- We shall strive to improve our environmental performance through implementation of our Environmental policy.
- We shall ensure a high level of business performance while minimising and effectively managing business risks.
- We will register and resolve customer complaints in accordance with our non-conformance procedures.
- We shall operate an equal opportunities policy for all present and potential future employees.
- We will offer our employees clear and fair terms of employment and provide resources to enable their continual development.
- We shall maintain a clear and fair employee remuneration policy and shall maintain forums for employee consultation and business involvement.
- We shall provide safeguards to ensure that all employees are treated with respect and without sexual, physical or mental harassment.
- We shall provide, and strive to maintain, a clean, healthy and safe working environment.
- We shall uphold the values of honesty, partnership and fairness in our relationships with stakeholders.
- Our contracts will clearly set out the agreed terms, conditions and the basis of our relationship.
- We will operate in a way that safeguards against unfair business practices.
- We shall encourage suppliers and contractors to adopt responsible business policies and practices for mutual benefit.

Signed:  Date: January 2026

Printed: Paul Edwards

Position: Director

WASTE MINIMISATION AND SUSTAINABILITY POLICY STATEMENT

- Recycling implemented, with all reusable plastics, metals, glass and paper, batteries and cardboard being stored in designated areas and disposed of at recycling centres as appropriate or collected for recycling by a licensed waste contractor.
- Where possible all business reports are digitised and saved electronically to reduce use of paper. Sensitive documents are shredded and then also recycled.
- The company will replace standard lighting with energy efficient light bulbs where feasible and utilise the option of power saving modes present on all low energy consumption computers in the offices. With the exception of the dedicated server all computers and lighting in the offices are turned off at night.
- Heating systems are serviced regularly, thermostatically controlled and switched off when not required.
- Lighting is switched off when not required.
- The company vehicles are maintained at the intervals specified by the manufacturer to the specifications recommended by the manufacturer. Regular servicing ensures that the emissions from the vehicles are kept at the correct levels and also increases vehicle life.
- Vehicles are replaced regularly, which ensures the fleet is maintained at the latest emissions standards.
- Journeys are planned to minimise emissions and the use of fuel.
- Packaging materials are reused to minimise the use of new packaging.
- We as a company procure materials from sustainable sources as much as we possibly can.
- We have stringent guidelines involving our site works and field operations.
- All site work is undertaken in accordance with environmental legislation to ensure that our works and processes do not increase risk of contamination on-site.
- We are also careful to ensure that the materials used on site are appropriate to the job and will not present a contamination risk on site.

Signed:  Date: January 2026

Printed: Paul Edwards

Position: Director

EQUAL OPPORTUNITIES POLICY – INCLUDING DIVERSITY & INCLUSION)

The Company recognises that discrimination exists in society, and is committed to developing and promoting ways of working that ensure that employees and clients are not subjected to direct or indirect discrimination. We wholeheartedly support the principles of equal opportunities in employment and service delivery, and oppose all forms of unlawful or unfair discrimination.

We will uphold all laws relevant to promoting equality, Diversity, Inclusion and countering discrimination, and are bound by The Equality Act 2010. Under the Act, it is unlawful to discriminate against people at work because of the nine protected characteristics, these are;

- Age
- Disability
- Race
- Gender Reassignment
- Marriage & Civil Partnership
- Pregnancy & Maternity
- Religion or Belief
- Sex or Sexual Orientation

The Company is committed to equality of opportunity in its provision of services. To this end all who approach it for services will be treated fairly and equally. This will be promoted to all stakeholders and expected of all partnering organisations & individuals.

Diversity & Inclusion

Our people are what make our company work well. They come from a wide range of cultures and bring with them an array of experiences; the fresh thinking and passion they bring to work every day is a direct result of that tremendous diversity. Our approach to business is underpinned by a belief that all individuals should be treated fairly and have access to equal opportunities, regardless of their status. To attract, recruit, develop and retain the very best people at all levels, we are committed to respecting and embracing talent and working to support a culture that is inclusive and reflective of our vision and values.

We also look for high levels of inclusion in our suppliers, evidenced through a diverse make-up, and encourage them to adopt similar philosophies in their relationships with their own employees and suppliers.

Our approach is based on three key principles:

Inclusion – we create a working culture where we value the whole person and the experiences they bring to work; everyone has the opportunity to develop in a way that is consistent with our vision and values. Our aim is to be an organisation where people feel involved, respected and connected to our success.

Equality – we promote equality by removing barriers, eliminating discrimination and ensuring equal opportunity and access for all groups of people, both within the company and externally among those organisations with whom we have formal relationships.

Diversity – we accept each person as an individual. Our success and competitiveness are built on our ability to embrace diversity – and we believe that everyone should feel valued for their contributions. By working together, we will deliver the best possible solutions for our people, our clients and our business.

Requirements

No job applicant or employee will receive less favourable treatment on the grounds of sex, race, age, ethnic origin, marital status, pregnancy and maternity, civil partnership status, any gender re-assignment, religion or belief, sexual orientation, disability or part-time/fixed-term work;

Employees will be protected from discrimination by association;

Inclusion, equality and diversity will be promoted within the workplace;

- We will contribute to generating similar attitudes to ours, in terms of inclusion, in the wider community. We will also look for similar principles of inclusion when we select and manage relationships with our suppliers;
- Fair and equitable treatment will be the hallmark of every aspect of working life at the company, from our written procedures through to every decision we make;
- We will promote a culture where employees recognise the value that an inclusive workforce, evidenced through a diverse make-up, brings to the organisation; and where colleagues and external associates are treated with dignity and respect; and
- We will create an environment where anyone believing they have been subjected to discrimination, victimisation, bullying or harassment in the workplace, is entitled and feels safe to raise such concerns. We are committed to ensuring that the process for dealing with these concerns is straightforward and will be addressed in a compassionate, efficient and timely manner.
- Employees and clients can refer to our Grievance policy if they believe they have been subjected to discrimination, victimisation, bullying or harassment in the workplace.

The Senior Management of the Company are responsible for:

- Ensuring that all of our policies, processes, procedures and practices underpin delivery of the inclusion policy;
- Cascading inclusion lessons learned and sharing best practice throughout the business; and
- Championing key issues and collectively recommending changes to policies, processes, procedures and practices.
- Keeping all related processes and procedures under review and monitoring employment practices;
- Providing relevant advice and supporting all staff in championing inclusion across the company.
- Ensuring that this policy and supporting strategies and procedures are distributed, implemented and complied with; and
- Leading by example in protecting the companies brand and championing knowledge sharing across the businesses.
- Implementing and enforcing the processes and procedures;
- Ensuring that our people are aware of their responsibilities and receive appropriate training; and
- Addressing any inappropriate behaviour.

Employees are responsible for:

- Carrying out their work in line with this policy and associated processes and procedures;
- Respecting the rights of all employees to work in an environment that is free from prejudice and discrimination;
- Challenging any behaviour that falls short of the expectations of this policy; and
- Identifying any breaches of this policy and reporting them to management.

What will successful implementation of this policy achieve?

- Greater engagement and productivity of our people who bring their whole selves to the workplace;
- Recognition by external bodies in the form of awards, nominations and accreditations;
- Continual improvement in all areas



Signed:

Date: January 2026

Printed: Paul Edwards

Position: Director

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors and suppliers.

The Company strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers and contractors will hold their own suppliers to the same high standards.

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights. The Company is committed to enforcing the Modern Slavery Act (2015).

The Company expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains;
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy; and
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.

We take a risk based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk based approach we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.

Consistent with our risk based approach we may require:

- Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct; and
- Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the code of conduct.

As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.

If we find that other individuals or organisations working on our behalf have breached this policy we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationship.

During 2024 the company has distributed awareness material to help staff spot the signs of modern slavery.



Signed: Date: January 2026

Printed: Paul Edwards

Position: Director

DISCIPLINARY POLICY

Purpose & Scope

This Disciplinary Policy provides a framework to manage concerns about someone's conduct in a fair and timely way. It aims to help people achieve and maintain required standards of conduct whilst employed by Frontline.

Policy Statement

Managers are responsible for ensuring their team is aware of the required standards of conduct at Frontline, and for bringing any concerns in relation to their conduct to the attention of employee/s at the earliest opportunity.

Managers should try to resolve minor matters of concern informally. If an informal approach does not bring about improvement or if misconduct is sufficiently serious, formal stages of this procedure may be activated and followed.

Managers will ensure that all action taken under this policy is reasonable and proportionate. At an early stage, employees will be told why disciplinary action is being considered and be given the opportunity to respond to any allegation before any formal sanctions are taken.

Employees can be accompanied and represented, at a disciplinary hearing by a work colleague, trade union representative.

Handling Allegations of Misconduct and Investigating the Facts

Allegations of misconduct will be carefully assessed by the Line Manager, to decide if the matter can be managed informally where possible or whether there are grounds for further investigation and/or formal action.

The Line Manager will carry out some initial fact finding and meet the employee to establish their version of events. The manager may also meet with other relevant individuals to get a good understanding about what has happened.

Investigations will be carried out without unreasonable delay. All cases that could lead to dismissal will be investigated thoroughly. The Line Manager will be responsible for the investigation and for clearly identifying what is to be investigated.

Under exceptional circumstances employees may be accompanied at investigation meetings by a work colleague or a trade union representative. A director must approve this.

Once the investigation is complete, the Line Manager will consider the findings and decide if further action is required; whether the matter can be dealt with informally or whether formal disciplinary action may be appropriate.

Informal Management

Frontline recognises that cases of minor misconduct are best dealt with informally and quickly. A quiet and informal conversation may all be needed. This will be a two-way discussion, aimed at talking through shortcomings and encouraging improvement.

Feedback should be constructive with an emphasis on finding ways to improve. The Line Manager will make sure the employee understands the standards expected and will explain how their conduct will be monitored and set a clear timescale for improvement. The Line Manager will discuss with employees any support or training they may need. The Line Manager will keep brief notes of any informal action for reference purposes.

Where appropriate, the Line Manager may also summarise concerns and expectations in writing, a copy of which will be placed on the personal file. If informal action does not bring about the required improvement, or the misconduct is too serious to be classed as minor, formal disciplinary action may be considered.

Suspension

In most cases, suspension from work will not be necessary and the employee will be able to continue doing their normal job while matters are investigated.

Suspension is not a disciplinary sanction and there is no assumption of guilt.

The decision to suspend will only be taken if genuine risks are identified and all alternative options have been ruled out.

Suspensions will be managed sensitively and confidentially.

When considering suspension, managers must assess the risks of the employee remaining at work.

Where a manager wishes to suspend an employee, they must seek approval from a director.

Suspension will only normally be considered if there is a serious allegation of misconduct and:

- working relationships have severely broken down
- there is a risk of the employee tampering with evidence, influencing witnesses and investigation
- there is a risk to the employee themselves, other employees, kit, or equipment

Alternatives to suspension must and will be considered, with guidance from a director and where appropriate could include the employee temporarily:

- being moved to a different area of the workplace
- changing their working hours
- being placed on restricted duties
- working under supervision
- being transferred to a different role within the organisation (If the employee has the competencies and/or skills to operate)
- Other meaningful activities that the individual could do should be actively explored. This could include working remotely

Formal Procedure

Once the matter has been investigated and it has been established that there is a case to answer, a disciplinary meeting 'hearing' will be arranged.

The hearing should be held as soon as possible after the investigation. The Line Manager, employee and their representatives must make every effort not to unreasonably delay meetings.

Preparing for the Hearing

People will be given at least 24 hours' notice of the hearing in order to have time to prepare. The employee will be provided with investigation notes and any related documents including witness statements to be presented at the hearing.

Prior to the hearing, the employee will be advised of the potential outcome such as a formal warning or dismissal in the invite to disciplinary hearing letter.

Employee Representative

Employees can attend formal hearings and be accompanied by an accredited trade union representative or work colleague. It is the responsibility of the employee to arrange their companion and to inform the chairing manager who they would like to attend.

Disabled employees may also wish to be accompanied by a second person as a support worker or someone with knowledge of the disability and its effects. If the employee requires assistance or support arranging for a second person to attend, then chairing manager will assist in making such arrangement.

Employees should make every effort to attend meetings and notify the chairing manager as soon as reasonably possible if they cannot attend. If an employee or their companion/representative is unable to attend, they must suggest an alternative date so that the hearing takes place within five working days from the original date. If an employee is unable to attend a rescheduled meeting, alternative arrangements such as telephone conference, representative attending on their behalf or written submissions may be considered or the meeting may proceed in their absence.

Hearing Format

At the hearing, the manager will present the case and where applicable present any investigation documents.

The employee will be given the chance to set out their case, answer any allegations, ask questions, show evidence that has not been produced within the investigation bundle.

In considering the sanction, the chairing manager may take in to account the employee's previous work record and other mitigating factors.

The outcome of a hearing will be notified in person by the chairing manager.

The outcome of the meeting will also be confirmed in writing, normally within five calendar days. If disciplinary action is taken, the letter will include details of the complaint, the improvement required (if appropriate) and the right to appeal where a formal sanction is issued. It will also state that further disciplinary action may be taken if there is not a satisfactory improvement. Hearings may result in no formal sanctions being issued; however standard setting, training and/or line/individual recommendations may be put in place, if appropriate.

Formal Disciplinary Sanctions

Once all the facts have been considered by the chairing manager a decision will be taken on the appropriate action. Depending on the findings, this may result in no action being taken, informal management action or a disciplinary sanction.

The seriousness of the misconduct will determine the level of disciplinary action to be taken. The procedure may be entered at any stage.

Stage 1 - First Written Warning: If the employee fails to meet required standards following informal action or if the offence is sufficiently serious to warrant moving straight to the formal stages, a First Written Warning may be given. First Written Warnings are confirmed in writing and apply for 9 months after which time they lapse.

Stage 2 - Final Written Warning: If the failure to meet required standards continues or if the offence is one of sufficiently serious (but not gross) misconduct, a final written warning may be given. Final written warnings are confirmed in writing and apply for 12 months after which time they lapse.

Stage 3 – Dismissal: If conduct remains unsatisfactory or if the offence constitutes gross misconduct, dismissal will normally result. Except in cases of gross misconduct, dismissal will be with notice. Cases of gross misconduct may result in summary dismissal, i.e., dismissal without notice. Dismissals may be reported to the relevant professional body as appropriate.

Appeals

Everyone has the right to appeal against any formal disciplinary action. Appeals will be handled in accordance with the employee handbook.

Appeals against dismissal will be heard by director. In the absence of a director the appeal hearing will be heard by the HR Manager.

The appeal chairperson will have no previous involvement in the case or any conflict of interest that could influence decision making process. However, it may be necessary for a manager who has had previous input in the disciplinary process to chair the appeal due to limited personnel within the business. If the chairperson has been involved in the process, then objectivity and impartiality will apply throughout the appeal hearing and the decision making.

Signed:



Date: January 2026

Printed: Paul Edwards

Position: Director

GRIEVANCE POLICY

You as an employee or similar status, need to be aware that the Company is completely committed to the principle of equal opportunity in employment. Accordingly, management will ensure that any grievances are dealt with appropriately.

This policy explains how employees/candidates/contractors (known as “The Worker”) etc can voice their complaints in a constructive way. Supervisors / Line Managers should be aware of what annoys employees or hinders their work, so they can resolve it as quickly as possible. The worker should be able to follow a fair grievance procedure to be heard and avoid conflicts.

The company encourages employees to communicate their grievances. That way we can foster a supportive and pleasant workplace for everyone.

Scope

This policy refers to everyone in the company regardless of position or status:

- Policy elements
- Grievance definition

We define grievance as any complaint, problem or concern of an employee regarding their workplace, job or co-worker relationships.

Workers can file grievances for any of the following reasons:

- Workplace harassment
- Health and safety Issues
- Supervisor / Management behaviour
- Adverse changes in employment conditions

This list is not exhaustive. However, employees should try to resolve less important issues informally before they resort to a formal grievance.

Workers who file grievances can:

- Reach out to their direct supervisor or HR department
- File a grievance form explaining the situation in detail
- Refuse to attend formal meetings on their own
- Appeal on any formal decision

Workers who face allegation have the right to:

- Receive a copy of the allegations against them
- Respond to the allegations
- Appeal on any formal decision

The company is obliged to:

- Have a formal grievance procedure in place
- Communicate the procedure
- Investigate all grievances promptly
- Treat all employees who file grievances equally
- Preserve confidentiality at any stage of the process
- Resolve all grievances when possible
- Respect its no-retaliation policy when employees file grievances with the company or external agencies (e.g. equal employment opportunity committee)

Workers are encouraged to talk to each other to resolve their problems. When this isn't possible, employees should know how to file a grievance:

1. Communicate informally with their direct supervisor. The supervisor will try to resolve the problem. When employees want to complain about their supervisor, they should first try to discuss the matter and resolve it between them. In that case, they're advised to request an informal meeting.

2. Supervisors should try to resolve any grievance as quickly as possible. When they're unable to do so, they should refer to the HR department and cooperate with all other procedures.
3. If the grievance relates to a supervisor behavior that can bring disciplinary action (e.g. sexual harassment or violence), employees should refer directly to the HR department or the next level supervisor.
4. Accommodate the procedure outlined below

The HR department (or any appropriate person in the absence of an HR department) should follow the procedure below:

1. Discuss the grievance and record it formally as accurately as possible to ensure the matter is understood completely.
2. Provide the employee who faces allegations with a copy of the grievance
3. Organize mediation procedures (e.g. arranging a formal meeting)
4. Investigate the matter or ask the help of an investigator when needed
5. Keep employees informed throughout the process
6. Communicate the formal decision to all employees involved
7. Take actions to ensure the formal decision is adhered to
8. Deal with appeals by gathering more information and investigating further
9. Keep accurate records

This procedure may vary according to the nature of a grievance. For example, if an employee is found guilty of racial discrimination, the company will begin disciplinary procedures.

Signed:  Date: January 2026

Printed: Paul Edwards Position: Director

INFORMATION SECURITY POLICY

Objective

The objective of information security is to ensure the business continuity of the company and to minimize the risk of damage by preventing security incidents and reducing their potential impact.

Policy

The company is committed to protecting our IT infrastructure, protecting data both internal and external to our business. Our business employs an external IT specialist who actively protects our entire IT infrastructure against current and future potential threats.

- The policy's goal is to protect the organization's informational assets against all internal, external, deliberate or accidental threats.
- The security policy ensures that:
 - Information will be protected against any unauthorized access;
 - Confidentiality of information will be assured;
 - All information is backed up on external servers located outside Pump Supplies premises.
 - Actively communicates procedures to all employees on IT security and associated risks.
 - Any new information systems implemented through the network fully complies with our IT information security infrastructure.
 - Availability of information for business processes will be maintained;
 - All actual or suspected information security breaches will be reported to the Managing Director who will thoroughly investigate and provide future guidance.
- Procedures exist to support the policy, including virus control measures, passwords and continuity plans.
- Business requirements for availability of information and systems will be met.

Signed:



Date: January 2026

Printed: Paul Edwards

Position: Director

ANTI-BRIBERY POLICY (IN COMPLIANCE WITH THE BRIBERY ACT 2010)

It is the policy of the company to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate. We are also committed to implementing and enforcing effective systems to counter bribery.

This policy applies to all individuals working at all levels and grades, including senior managers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, and any other person providing services to us.

A bribe is a financial or other advantage offered or given:

- To anyone to persuade them to or reward them for performing their duties improperly
- To any public official with the intention of influencing the official in the performance of his duties.

This policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality. However, in certain circumstances gifts and hospitality may amount to bribery and all employees must notify the company in respect of gifts and hospitality. We will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence them in the performance of their duties.

We do not make, and will not accept, facilitation payments or “kickbacks” of any kind. All employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us. We do not make contributions of any kind to political parties. No charitable donations will be made for the purpose of gaining any commercial advantage.

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

All expense claims relating to hospitality, gifts or expenses incurred to third parties must be approved prior to expenditure. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, must be prepared and maintained with strict accuracy and completeness. No accounts must be kept “off-book” to facilitate or conceal improper payments.

Employees will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage, directly with their line manager. If their suspicion is about their Line Manager, then they can contact the Managing Director. No employee will suffer any detriment because of raising genuine concerns about bribery, even if they turn out to be mistaken. Internal control systems and procedures will be subject to audit under the internal audit process.

The responsibility for the implementation of this policy lies with the Managing Director

Signed:  Date: January 2026

Printed: Paul Edwards

Position: Director

DATA PRIVACY POLICY

This data privacy policy sets out how Frontline construction recruitment Ltd (herein after referred to as “The Company”) uses and protects any information that Employees, Subcontractors, Customers and/or Suppliers gives to the company via email/post/in person.

The company is committed to ensuring that your privacy is protected. We will comply with the principles of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) and aim to maintain best-practice standards in our processing of personal and/or sensitive personal / company sensitive data.

Should we ask you to provide certain information by which you can be identified it will only be used in accordance with this privacy statement.

Where changes to this policy are required updated issues will be emailed out and be made available to all appropriate personnel / interested parties.

We may collect the following information:

- Name and job title.
- Contact information including email address.
- Demographic information such as postcode.
- National Insurance Number
- Bank / Financial Details.
- Date of birth.
- Emergency Contact Name and Number
- Copy of passport

What we may have to do with the information:

- Communicate with Subcontract companies, Clients during projects / contracts.
- Payment of invoices / Salaries
- Completion of security forms in order to obtain access to Government locations if required.
- Health and safety documentation
- Training documentation

Who we collect information from:

- Full Time/Part Time or Temporary Workers / Employees
- Subcontractors (Individuals or Subcontract Companies)
- Sponsored Individuals (for Railway Working)
- Suppliers – company information only.

Security

We are committed to ensuring that your information is secure. Electronic information stored on the company server is password protected. Passwords can be changed at periodic / regular intervals. The company server has a firewall protection. Each computer system has virus protection that scans when the system initially starts and continually throughout the time it is running – for each document that is opened.

Paper documents are filed securely and only available to specific people.

Any personal information you send to us via email/post is done so at your own risk.

Sharing of data

Personal data may be shared with a third party where we have to check, then forward application forms for any required security clearances.

Personal data will not be shared unless prior agreement is made with those concerned.

Data Consent Form

Where individuals or organisations are requested to provide information to the company, a Data Consent Form (DCF) will also need to be completed by the individual(s) concerned.

This will provide the company with the authority to use the data as specifically required.



How to withdraw your consent

You can withdraw the consent you are giving at any time. You can do this by either writing to us, or emailing us at the addresses below:

Frontline Construction
Challenge House
Sherwood Drive
Bletchley
Milton Keynes
MK3 6DP
Email Address: Joanne@frontline-construction.co.uk

Access to Information

The Data Protection Act gives you the right to obtain/view the personal data held by the company at any time.

Should you wish to obtain a copy then please email: Joanne@frontline-construction.co.uk

Signed:  Date: January 2026

Printed: Paul Edwards

Position: Director

POLICY ON ALCOHOL & DRUGS IN THE WORKPLACE

1. Frontline Construction Recruitment Ltd believes that it is essential that all employees, workers and those who render services to the Company or at the Company's premises are in full command of themselves and of all of their faculties throughout the working day.
2. Frontline Construction Recruitment Ltd requires you to present yourself for work on each occasion required under your contract in complete command of all your faculties i.e. without any dependence on alcohol or any other drugs of a non-medicinal nature and to maintain that state until the completion of your working hours under your contract. If during the course of your working day you have to take medicinal drugs on a regular basis, this fact should be known to Lewis Edwards or a Director of Frontline Construction Recruitment Ltd and the Manager of the Client you are working for confidentially.
3. In the event that you present yourself at work or during working hours in a condition where the relevant Manager believes you to be under the influence of alcohol or drugs and you are not able to carry out your duties in a proper, fit and safe way, you will not be allowed to commence work or continue work. Instead you will be suspended without pay and not allowed to return until such a time as you are in full control of your faculties.
4. In addition such behaviour will be subject to the disciplinary procedure of Frontline Construction Recruitment Ltd and after due investigation may result in dismissal as a result of gross misconduct.
5. Frontline Construction Recruitment Ltd is obliged to investigate all the circumstances surrounding such behaviour prior to commencing the disciplinary procedure and this may, where necessary, include seeking medical advice as to your condition including requiring you to submit to a medical examination. Frontline Construction Recruitment Ltd is obliged to investigate such matters in as much detail as possible and therefore expects you to comply with any requests that you submit to such examinations. You may appeal in accordance with the Company's disciplinary procedure.
6. If the disciplinary procedure is evoked and you receive a disciplinary sanction short of dismissal or if you have a successful appeal Frontline Construction Recruitment Ltd will recommend that you take advantage of counselling services to help control your problem and you will be required to act of any such recommendation. In the event that you need to be absent from work for a period of treatment for either alcohol or drug dependency a reasonable leave of absence will normally be granted to cover this on an unpaid basis.
7. If Frontline Construction Recruitment Ltd suspects that you are in the possession of alcohol or drugs you will be required to consent to a search of your belongings. If you are found to be in possession of any alcohol or illegal substances you will be suspended from your duties pending further investigation. This matter will be dealt with under the Company's disciplinary procedure and after due investigation it may result in dismissal for gross misconduct.
8. If Frontline Construction Recruitment Ltd believes you are dealing, buying, selling or receiving drugs or alcohol you will suspended from your duties while an investigation is carried out. Where a criminal offence is suspected the Company shall inform the police.
9. All employees and workers are required to inform Frontline Construction Recruitment Ltd or any appropriate person if they suspect any fellow worker may be acting in breach of this policy.

Signed:  Date: January 2026

Printed: Paul Edwards

Position: Director

COMPANY CAR POLICY

1. Authorised Drivers

The Company authorises the use of Company Cars by the following drivers:

- a). All employees

Employees who use a company car must be in possession of a valid driving license.

Driving without a valid driver's license is not permitted at any time and the employer has the right to demand the return of the car from the employee in the event that there is no valid driving license.

The employee must notify the employer of any changes, restrictions and withdrawal of their driving license immediately.

Spouses and life partners of the employees are not permitted to use the company car.

All Frontline employees may use the vehicles for business trips.

2. Insurance

- a). Terms of Cover

Fully comprehensive insurance cover is provided for all authorised users of Company cars

Accidental damage is to be reported immediately if during working hours or at the next opportunity to the office Secretary.

At the time of an accident or incident a full report must be made and if another car(s) is involved the names, telephone numbers, insurance details and car registrations of the other vehicles are to be reported.

In case of an accident where the damage that has been caused by the employee's negligence, the employer has the right to demand the employee bears the cost of the excess to the insurance company.

In cases in which an employee by intent or gross negligence (eg, under the influence of alcohol or narcotic) has caused serious damage to the vehicle the Employee can be liable for the costs of repair and/or be liable for a disciplinary.

3. Driving Offences

If you are banned from driving for a period of time as a result of a traffic offence, it is your responsibility to ensure that appropriate plans are put in place to enable you to still fulfil the duties of your job. Any costs incurred as a result of this, e.g. taxi or train fares, should not be reclaimed from the Company.

Should you incur a parking fine or recovery fine due to illegal parking which gets paid by the rental/lease company as part of our direct debit mandate accounts will deduct the equivalent sum from your salary in the month following the infringement.

4. Driver Responsibilities

Car Maintenance

The user has to ensure that the vehicle is handled with care and damage is to be avoided. For any damage that goes beyond the usual wear tear which includes any damage caused by negligence can be chargeable to the employee by deduction from salary. This also applies to driving with extreme force which can cause wear on the internal workings of the engine.



You are responsible for ensuring that the car is properly maintained at all times and must be kept in a fully roadworthy, safe and clean condition. Water, oil, tyres and brakes should be checked regularly. Tyres should last as per manufacturers recommendations.

At the expiry of the lease, the car should be returned in a condition commensurate with its age and mileage.

Your annual mileage allowance will be confirmed during induction if applicable if you go over this, you will be liable for the excess mileage.

If excessive valeting or repairs are required (i.e. cleaning beyond basic vacuuming) or the value of the car is significantly reduced because of excessive wear and tear (i.e. damage) you may be asked to bear the cost.

An independent assessment will be obtained and you will be informed before a charge is made. In the event of a dispute, the judgement of the UK Director, in the light of the independent assessment, will be final.

5. General safety information

Drivers must ensure that any valuables left in the vehicles are locked away in the boot of the car, especially laptops, mobile phones, suitcases, briefcases etc.

Your driving style will be monitored using the car tracking system and all road regulations should be followed at all times.

No smoking is permitted in Company vehicles.

Signed:

A handwritten signature in black ink, appearing to read 'Paul Edwards', written over a horizontal line.

Date: January 2026

Printed: Paul Edwards

Position: Director

REFUSAL TO WORK ON GROUNDS OF HEALTH & SAFETY

1. Introduction

1.1: This statement sets out the policy of the company in respect of "Refusal to work on the grounds of Health & Safety" by all employees (or sub-contractors, if appropriate)

1.2: A copy of the above referenced document is available to the company should a fuller interpretation be required and forms the basis for the following synopsis.

1.3: All persons referred to in 1.1 above are to be made aware of the contents of this policy and become familiar with the conditions laid down.

2. Responsibility

2.1: The Company will take all reasonable measures to ensure that those persons referred to in 1.1 above are made aware of the contents of this policy and that it will not effect their continued employment by the company in the event of any invoking of this policy.

2.2: The company will take all reasonable measures to prevent, so far as is reasonably practicable, any invocation placed on any person by this policy by planning safe working conditions and taking all factors into account.

2.3: Employees of the company will at all times exercise diligence in monitoring their safe working environment for themselves and other persons in the working area

3. Criteria for Invoking the Policy

3.1: It is a condition of employment with the company that all persons referred to in 1.1 above shall comply with the following:

- If any situation arises which an employee believes will or has resulted in an unsafe working environment for some or all they must immediately draw it to the attention of their direct line manager so he can investigate and resolve the issue locally, if possible via completion of the appropriate "Refusal to Work" report form.
- If line management cannot be immediately contacted then in a safe manner stop or do not commence any working operations subject to the risks identified, and warn others in danger of the concerns you have.
- Double check that there are no instructions or information available locally to resolve the issue
- If a conflict or disagreement occurs then an escalation process will be used to independently review the issue and resolve the concerns.
- Ensure that you are clear in describing what the concerns or issues are
- Providing the concern is genuine, even if it is ultimately seen to be unfounded then the employee will not be the subject of any detrimental action by The Company.

The responsibility for the implementation of this policy lies with the Managing director

Signed:  Date: January 2026

Printed: Paul Edwards Position: Director

MENTAL HEALTH AND WELLBEING POLICY

Policy Statement:

The company is committed to the protection and promotion of the mental health and wellbeing of all staff. The company shall continuously strive to improve the mental health environment and culture of the company by identifying, eliminating, or minimising all harmful processes, procedures and behaviours that may cause psychological harm or illness to its employees.

The company shall continuously strive, as far as is reasonably practicable, to promote mental health throughout the company by establishing and maintaining processes that enhance mental health and wellbeing, including upskilling selected employees with mental health awareness training

Policy Aim:

To provide a working environment that promotes and supports the mental health and wellbeing of all employees.

Scope:

This policy will comply with Health and Safety legislation and best practice guidelines. This policy will be developed in accordance with existing company policies and procedures. This policy will be owned at all levels of the company, developed and implemented across all departments, evaluated and reviewed as appropriate.

Policy Objectives

To develop a supportive culture, address factors that may negatively affect mental wellbeing, and to develop management skills through the following policy actions:

- Reduce discrimination and stigma by increasing awareness and understanding
- Complete an employee survey to identify mental health needs
- Give employees information on and increase their awareness of mental wellbeing.
- Include information about the mental health policy in the staff induction programme.
- Provide opportunities for employees to look after their mental wellbeing, for example through physical activity, stress reducing activities and social events.
- Promote the Five Ways to Wellbeing concept
- Provide systems that encourage predictable working hours, reasonable workloads and flexible working practices where appropriate.
- Ensure all staff have clearly defined job descriptions, objectives and responsibilities and provide them with good management support, appropriate training and adequate resources to do their job.
- Manage conflict effectively and ensure the workplace is free from bullying, harassment, discrimination and racism.
- Establish good two-way communication to ensure staff involvement, particularly during periods of company change.
- Ensure that employees have a clearly defined role within the company and a sense of control over the way their work is organised.
- Ensure appropriate individual job design with relevant training, supervision and support provided as required.
- Ensure a physical environment, supportive of mental health and wellbeing including a sound, ergonomically designed working situation with appropriate lighting, noise levels, heating, ventilation and adequate facilities for rest breaks.
- Promote and support opportunities to enhance professional development, identified through the appraisal.

- Provide training for designated staff in the early identification, causes and appropriate management of mental health issues such as anxiety, depression, stress and change management.

To provide support for employees experiencing mental health difficulties. through the following actions:

- Ensure individuals suffering from mental health problems are treated fairly and consistently.
- Manage return to work for those who have experienced mental health problems and in cases of long-term sickness absence, put in place, where possible, a phased return to work.
- Give non judgemental and pro- active support to individual staff that experience mental health problems such as counselling, CBT etc
- Ensure employees are aware of the support that can be offered through occupational health department, Employee Assistance Programme (if applicable) or alternatively their own GP, or a counsellor.
- Make every effort to identify suitable alternative employment, in consultation with the employee, where a return to the same job is not possible due to identified risks or other factors.
- Treat all matters relating to individual employees and their mental health problems in the strictest confidence and share on a 'need to know' basis only with consent from the individual concerned.

To encourage the employment of people who have experienced mental health problems through the following actions:

- Show a positive and enabling attitude to employees and job applicants with mental health issues. This includes having positive statements in recruitment literature.
- Ensure that all staff involved in recruitment and selection are briefed on mental health issues and the Disability Discrimination Act, and are trained in appropriate interview skills.
- Ensure all line managers have information and training about managing mental health in the workplace.

To recognise that workplace stress is a health and safety issue through the following actions:

- Adopt the principles of the HSE Stress Management Standards for employees or groups of employees that it is felt may be affected by stress
- Consult with trade union safety representatives on all proposed action relating to the prevention of workplace stress.
- Provide training in good management practices
- Provide confidential counselling and adequate resources.
- Align with other relevant policies such as physical activity, alcohol and absence management

Communication through the following actions:

- All employees will be made aware of the mental wellbeing policy and the facilities available. This will be part of a health at work policy, which will be included in the employee handbook and employee information or induction packs.
- The works forum /Health and Safety Committee will take forward the actions from this policy.
- Regular updates will be provided to all employees via their line management.

Review and monitoring

Employees participating in any of the mental wellbeing activities will be regularly asked for feedback. The mental wellbeing activities will be included in an annual 'health at work audit'.

The policy, status updates and evaluation reports will be circulated to management and be available on request.

The human resources department (or an individual as appropriate) will be responsible for reviewing the mental wellbeing policy and for monitoring how effectively the policy meets its aims and objectives

Signed:



Date: January 2026

Printed: Paul Edwards

Position: Director

ANTI-HARASSMENT, BULLYING & SEXUAL HARASSMENT POLICY

We, as a Company, recognise that harassment and victimisation are unlawful under the Equality Act 2010. As such, harassment, or victimisation on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation is unacceptable and will not be tolerated.

Personal harassment takes many forms ranging from unsavoury jokes and abusive remarks to pestering for sexual favours, threatening behaviour and actual physical abuse. For the purposes of this policy, it also includes bullying.

Bullying is understood to be targeted and persistent offensive, intimidating, malicious or insulting behaviour and can include the abuse or misuse of power to undermine, humiliate, denigrate, or injure the recipient.

Whatever form it takes, personal harassment is always taken seriously and is totally unacceptable.

We recognise that personal harassment can exist in the workplace, as well as outside, and that this can seriously affect employees' working lives by interfering with their job performance or by creating a stressful, intimidating, and unpleasant working environment.

We deplore all forms of personal harassment and seek to ensure that the working environment is sympathetic and supportive to all our employees. The aim of this policy is to inform employees of the type of behaviour that is unacceptable and provide employees who are the victims of personal harassment with a means of redress.

This policy covers all areas of the Company's organisation.

We recognise that we have a duty to implement this policy and all employees are expected to comply with it. We will also endeavour to review this policy at regular intervals in order to monitor its effectiveness.

Examples of personal harassment

Personal harassment takes many forms and employees may not always realise that their behaviour constitutes harassment. Personal harassment is unwanted behaviour by one or more employees towards another or others, examples of harassment include:

- insensitive jokes and pranks
- lewd or abusive comments
- deliberate exclusion from conversations
- displaying abusive or offensive writing or material
- abusive, threatening, or insulting words or behaviour
- name-calling
- picking on someone or setting them up to fail
- exclusion or victimisation
- undermining their contribution/position
- demanding a greater work output than is reasonably feasible
- blocking promotion or other development/advancement.

These examples are not exhaustive and disciplinary action at the appropriate level will be taken against employees committing any form of personal harassment.

Examples of sexual harassment

Sexual harassment can take place in many forms within the workplace and can go undetected for a period of time where employees do not understand that particular behaviour is classed as sexual harassment. Sexual harassment is unwanted behaviour related to sex, or of a sexual nature, by one employee towards another and examples of sexual harassment include:

- lewd or abusive comments of a sexual nature such as regarding an individual's appearance or body
- unwelcome touching of a sexual nature
- displaying sexually suggestive or sexually offensive writing or material
- asking questions of a sexual nature
- sexual propositions or advances, whether made in writing or verbally.

Sexual harassment can also take place where an employee is treated less favourably because they have rejected, or submitted to, the unwanted conduct that is related to sex or is of a sexual nature. Whether less favourable treatment occurs as a result will be examined broadly and includes areas such as

- blocking promotion and refusal of training opportunities or other development opportunities.

Examples of victimisation

Victimisation takes place when an employee is treated unfavourably as a direct result of raising a genuine complaint of discrimination or harassment. Furthermore, any employee who supports or

assists another employee to raise a complaint is also subjected to victimisation if they are treated unfavourably.

Third party harassment

The Company operates a zero-tolerance policy in relation to harassment perpetrated against one of its employees by a third party, such as a client/customer or visitor to the organisation. All employees are encouraged to report any and all instances of harassment that involve a third party in line with our reporting procedure, as outlined below.

If we find that the allegation is well-founded, we will take steps we deem necessary in order to remedy this complaint. This can include, but is not limited to:

- warning the individual and or parent organisation about the inappropriate nature of their behaviour
- banning and/or removal of the individual from company premises
- reporting the individual's actions to the police

In addition to this, the Company will endeavour to take all reasonable steps to deter and prevent any form of harassment from third parties taking place.

Employee responsibilities

The Company requires its employees to always behave appropriately and professional during the working day, and this may extend to events outside of working hours which are classed as work-related such as social events. Employees should not engage in discriminatory, harassing, or aggressive behaviour towards any other person at any time.

Any form of harassment or victimisation may lead to disciplinary action up to and including dismissal if it is committed:

- in a work situation

- during any situation related to work, such as a social event

- against a colleague or other person connected to the employer outside of a work situation, including all social media platforms

- against anyone outside of a work situation where the incident is relevant to their suitability to conduct the role.

A breach of this policy by will be treated as a disciplinary manner in line with the employee handbook.

Employer responsibilities

The Company will be responsible for ensuring all members of staff, including seniors and those within management positions, understand the rules and policies relating to the prevention of harassing and bullying behaviour at work and during work-related social events. We will promote a professional and positive workplace whereby managers are alert and proactively identify areas of risk and incidents of harassment, sexual harassment, and bullying.

We will also take into account aggravating factors, such as abuse of control over a more junior colleague, when deciding what disciplinary action to take.

Where an incident is witnessed, or a complaint is made under this policy, the Company will take prompt action to deal with this matter. All incidents will be deemed serious and dealt within in a sensitive and confidential manner.

Complaining about harassment and/or bullying

Informal method

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.

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.

Formal method

Where the informal approach fails or if the harassment is more serious, you should bring the matter to the attention of your Line Manager as a formal written grievance (A grievance form is available from your Line Manager), 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:

- the name of the alleged harasser

- the nature of the alleged harassment

- the dates and times when the alleged harassment occurred

- the names of any witnesses

- any action already taken by you to stop the alleged harassment

Where it is not possible to make the formal complaint to the above-named person, for example where they are the alleged harasser, we would encourage you to raise your complaint to the HR Manager. 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.

You will be invited to attend a meeting with 5 working days, at a reasonable time and location, to discuss the matter once the person hearing the grievance has had opportunity to read the matter/s raised. You have the right to be accompanied at such a meeting by a colleague or a union representative, 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.

Once the grievance hearing has taken place, the manager will then investigate the matter/s raised. The investigation should last no longer than 5 days. However, if the investigation should exceed 5 days, then the investigating manager will inform you in writing.

Once the investigation has finished and is complete you will be invited into a meeting by the investigating manager and informed of the outcome of the matter/s raised. The outcome will also be followed up in writing.

You will have a right to appeal the outcome, which is to be made to the appealing manager as stated in the outcome letter within 5 days of receiving the outcome.

If the decision is that the allegation is well founded, the harasser will be liable to disciplinary action in accordance with our disciplinary procedure up to and including dismissal.

The Company is committed to ensuring employees are not discouraged from using this procedure and no employee will be victimised for having brought a complaint.

Signed:

A handwritten signature in black ink, appearing to read 'Paul Edwards', written over a light blue horizontal line.

Date: January 2026

Printed: Paul Edwards

Position: Director

CORPORATE CRIMINAL OFFENSES POLICY

Following the introduction of the Criminal Finances Act 2017, Frontline Construction Recruitment has adopted a statement which emphasises our corporate values regarding anti-facilitation of tax evasion. It is our policy to conduct all of our business dealings in an honest and ethical manner. Our values 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 Frontline Construction Recruitment, to familiarise themselves with our Prevention of Corporate Criminal Offences Values Statement and to act at all times in a way which is consistent with our Corporate Criminal Offences Values Statement.

PREVENTION OF CORPORATE CRIMINAL OFFENCES VALUES STATEMENT

Frontline Construction Recruitment has a zero-tolerance approach to all forms of tax evasion, whether under UK law or under the law of any foreign country.

Employees 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, and Associates (as defined below), including but not limited to agency workers, seconded workers, volunteers, interns, contractors, external consultants, third-party representatives and business partners, sponsors 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. The Company adopts this policy. 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 contractors or an agent of the Company (other than a contractor) who is 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.

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).

The Government considers that prevention procedures put in place by relevant bodies to prevent tax evasion from being committed on their behalf should be informed by the following six principles:

- Risk assessment
- Proportionality of risk-based prevention procedures
- Top level commitment
- Due diligence
- Communication (including training)
- Monitoring and review

Procedures to prevent facilitation of tax evasion should be proportionate to risk.

COMPANY RESPONSIBILITIES

The Company has completed a risk assessment and has established procedures governing certain transactions with third parties designed to prevent specific areas of possible tax evasion by a third party. Specific guidance can be sought from HR Services.

The Company is responsible for offering employees appropriate training to understand tax evasion, and actions to take to prevent tax evasion. The training program can be requested at any time during employment with Frontline Construction Recruitment from the Senior Management Team.

WHAT TEAM MEMBERS AND ASSOCIATES MUST NOT DO

Employees and Associates must at all times adhere to the Frontline Construction Recruitment's Corporate Criminal Offences Policy and must ensure that they read, understand, and comply with this policy.

It is not acceptable for team members and Associates to:

- a) Engage in any form of facilitating Tax Evasion or Foreign Tax Evasion

- b) Aid, abet, counsel, or procure the commission of a Tax Evasion offence or Foreign Tax Evasion offence by another person
- c) 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
- d) Engage in any other activity that might lead to a breach of this policy; or
- e) Threaten or retaliate against another individual who has refused to commit a Tax Evasion offence or who has raised concerns under this policy
- f) 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 the third party (usually a customer)?
- Is there anything unusual about the customer's 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 Frontline Construction Recruitment 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 Frontline Construction Recruitment and will not be tolerated.

You are responsible for properly following the Frontline Construction Recruitment's policies and procedures. These should 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 AN 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.

Signed:



Date: January 2026

printed: Paul Edwards

Position: Director

ETHICS POLICY

Frontline Construction Recruitment limited dedicate ourselves to carrying out the effective and ethical trading of this company.

We commit that we will do the following:

- Recognise that the primary function of the company at all times is to serve the best interests of our clients and shareholders / Interested Parties.
- Accept as a personal duty the responsibility to keep up to date on emerging issues and to conduct ourselves with professional competence, fairness, impartiality, efficiency, and effectiveness.
- Respect the structure and responsibilities of the company and provide all directors and staff with facts and advice as a basis for their making policy decisions and uphold and implement policies adopted by the board.
- Conduct our organizational and operational duties with positive leadership exemplified by open communication, creativity, dedication, and compassion.
- Exercise whatever discretionary authority we have under the law to carry out the activities of the company.
- Serve with respect, concern, courtesy, and responsiveness in carrying out the company's services.
- Demonstrate the highest standards of personal integrity, truthfulness, honesty, and fortitude in all our activities in order to inspire confidence and trust in our activities.
- Avoid any interest or activity that is in conflict with the conduct of our official duties.
- Respect and protect privileged information to which we have access in the course of our official duties.
- Strive for personal and professional excellence and encourage the professional developments of others.
- Treat with respect and consideration all persons, regardless of race, religion, gender, abilities, age, or national origin.
- Ensure that employees have the right to be represented by a trade union.

Signed:



Date: January 2026

Printed: Paul Edwards

Position: Director

WHISTLEBLOWING POLICY

(Protected Disclosure Policy – In compliance with the Public Interest Disclosure Act 1998)

POLICY STATEMENT

Frontline Construction Recruitment Ltd (“The Company”) is committed to conducting its business with honesty, integrity and transparency.

The Company encourages employees, workers, agency staff, contractors, consultants and any individual working on behalf of the Company to raise genuine concerns about suspected wrongdoing at the earliest possible stage.

This policy provides a clear framework for reporting concerns in the public interest and offers protection to those who make disclosures in good faith.

This policy is non-contractual.

SCOPE

- Employees (permanent, temporary and fixed-term)
- Agency workers
- Contractors and subcontractors
- Consultants
- Any individual working under the supervision or direction of the Company

This policy is separate from the Company’s Grievance Policy.

WHAT IS WHISTLEBLOWING?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or danger at work.

- Criminal offences
- Breach of legal obligations
- Health and Safety risks
- Environmental damage
- Bribery or corruption
- Financial malpractice or fraud
- Modern slavery
- Miscarriage of justice
- Deliberate concealment of any of the above

The disclosure must be made in the public interest and reasonably believed to be true.

REPORTING PROCEDURE

INTERNAL REPORTING

- Your Line Manager



- A Director
- The Managing Director

If the concern relates to your Line Manager, it should be reported directly to a Director.

Written disclosures should include relevant details and evidence.

EXTERNAL REPORTING

- Health and Safety Executive (HSE)
- HM Revenue & Customs (HMRC)
- Serious Fraud Office (SFO)

INVESTIGATION PROCESS

- Acknowledge the concern
- Preliminary assessment
- Formal investigation where required
- Confidential handling

PROTECTION FROM DETRIMENT

No employee will suffer victimisation or retaliation for raising a genuine concern in good faith.

FALSE ALLEGATIONS

Deliberately false or malicious allegations may result in disciplinary action.

REVIEW

This policy will be reviewed annually.

Signed:

A handwritten signature in black ink, appearing to read 'Paul Edwards'.

Date: January 2026

Printed: Paul Edwards

Position: Director

CONFIDENTIAL REPORTING POLICY

(Anonymous & Protected Disclosure Framework)

1. Policy Statement

Frontline Construction Recruitment Ltd (“the Company”) is committed to maintaining the highest standards of integrity, transparency, and accountability in all business operations.

This Confidential Reporting Policy provides a secure and structured mechanism for employees and associated individuals to raise concerns about misconduct or unethical behaviour in confidence.

The Company encourages early reporting of concerns and will treat all disclosures seriously, professionally, and without retaliation.

This policy is non-contractual.

2. Purpose

The purpose of this policy is to:

- Provide a confidential reporting mechanism
- Protect individuals who raise concerns in good faith
- Ensure concerns are investigated appropriately
- Promote a culture of openness and accountability

This policy complements the Company’s Whistleblowing Policy and Grievance Policy.

3. Who Can Use This Policy

This policy applies to:

- Employees (permanent, temporary and fixed-term)
- Agency workers
- Contractors and subcontractors
- Consultants
- Individuals working under the supervision or direction of the Company

4. What Can Be Reported

Concerns may include (but are not limited to):

- Fraud or financial irregularity
- Bribery or corruption
- Criminal conduct
- Health and safety breaches
- Safeguarding concerns

- Harassment or discrimination
- Breach of legal or regulatory obligations
- Modern slavery
- Deliberate concealment of wrongdoing

Personal employment grievances should normally be raised under the Grievance Policy unless they raise wider public interest concerns.

5. Confidential Reporting Channels

Concerns may be reported confidentially to:

- Line Manager (where appropriate)
- A Director
- The Managing Director

If the concern involves senior management, it should be reported to a Director not connected with the issue.

Reports may be made:

- In writing
- Verbally
- Via confidential email
- Via sealed written submission marked "Private & Confidential"

Anonymous reports will be considered; however, the ability to investigate may be limited if further clarification is required.

6. Confidentiality

The Company will:

- Protect the identity of the reporting individual wherever reasonably practicable
- Limit disclosure of information to those directly involved in investigating the matter
- Store all reports securely and in accordance with data protection legislation

Absolute confidentiality cannot be guaranteed where legal obligations require disclosure (e.g., regulatory investigation or court proceedings).

7. Protection from Detriment

No individual who raises a genuine concern in good faith will suffer:

- Dismissal
- Disciplinary action
- Loss of opportunity
- Threats or harassment

- Any form of retaliation

Retaliation against a reporting individual will be treated as serious misconduct and may result in disciplinary action up to and including dismissal.

8. Investigation Process

Upon receiving a report, the Company will:

1. Acknowledge receipt (where possible)
2. Conduct a preliminary assessment
3. Determine whether formal investigation is required
4. Appoint an appropriate investigating officer
5. Conclude the matter with appropriate action

Where appropriate, the reporting individual will be informed that the matter has been addressed, though specific outcomes may remain confidential.

9. Malicious or False Allegations

Knowingly raising a false or malicious allegation may result in disciplinary action.

However, no action will be taken where a concern was raised honestly and reasonably, even if it is not substantiated.

10. Responsibility

The Managing Director has overall responsibility for:

- Oversight of confidential reporting procedures
- Ensuring compliance with legal obligations
- Reviewing this policy annually

All employees are responsible for raising concerns where wrongdoing is suspected.

11. Review

This policy will be reviewed annually or earlier if legislative or organisational changes require amendment.

Signed:



Date: January 2026

Printed: Paul Edwards

Position: Director