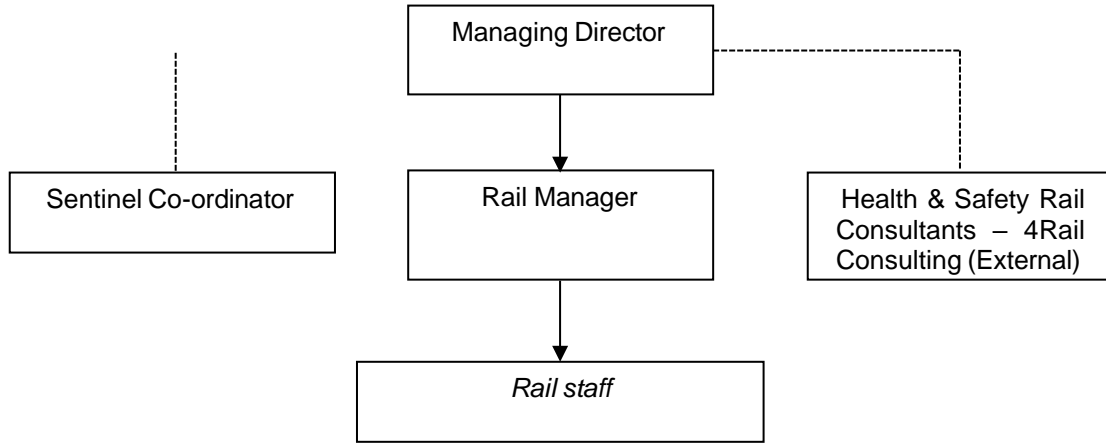


Organisation Chart



Universal Group Contact Information			
Universal Group Contact		Site Contacts	
Name:		Name:	
Telephone:		Telephone:	

Staff Safety Responsibility Statement

The following safety responsibility statement applies to all Universal Group staff who works on or about Rail Controlled Infrastructure.

1.	<i>You are required at all times to ensure avoidance of injury to yourself and colleagues and to minimise risk to the environment, railway infrastructure and the travelling public</i>
2.	<i>You are expected to demonstrate a positive and enthusiastic attitude towards safety in all dealings with management, staff, our clients and contractors.</i>
3.	<i>You must ensure that you have been provided with adequate Personal Protective Equipment and that you wear it correctly, keep it clean and have it replaced if necessary.</i>
4.	<i>You are expected to carry out and participate in accident and incident investigation. Any accidents or incidents must be reported in accordance with laid down procedures. Investigation and discussion of accidents, incidents and near misses will be carried out openly and in a 'no blame' culture.</i>
5.	<i>You are expected to participate with relevant input in safety briefings and other team meetings.</i>
6.	<i>You must not commence work unless you have been adequately briefed on, and understand the method of work, site specific risks, local hazards and the emergency arrangements for the site. Check that emergency communication equipment is working correctly.</i>
7.	<i>You must use, or be briefed on, site specific method statements and risk assessments for the work you are undertaking.</i>
8.	<i>Ensure that you work to the sections of the Rule Book applicable to the competencies you hold and the duties you are carrying out.</i>
9.	<i>Only access sites by official access points. Where possible, use authorized walking routes. YOU MUST carry your Sentinel Smart Card or copy of your TVP and always ensure you swipe on and off duty.</i>
10.	<i>Work to the instruction of the person in charge of the work.</i>
11.	<i>Always leave sites safe and free from loose materials.</i>

Sentinel Scheme Rules Individual Requirements

Every Individual has a personal responsibility to comply with health and safety rules including, but not limited to:

- No Individual shall undertake or attempt to report for duty, if they have worked on the managed infrastructure within the preceding 12 hours (sometimes referred to as double-shifting), unless a risk assessment has been conducted by the Primary Sponsor and suitable controls implemented
- No Individual shall exceed the maximum working hours determined by law or the, managed infrastructure requirements or the Sponsor, whichever is the shortest
- Every Individual has a responsibility to be fit for work, not fatigued by excessive travel or work, and not under the influence of drugs or alcohol. Individuals shall report anything that may affect their ability to work safely including medication, lack of equipment or personal circumstances
- An Individual shall report for duty with the appropriate Personal Protective Equipment (PPE) to enable them to undertake their duties
- No Individual shall undertake a task for which they are not competent, do not have the right equipment, or the relevant information or the knowledge to complete safely
- Individuals shall act in a safe manner at all times when on the managed infrastructure, and report any incident, close call or breach of the Sentinel Scheme Rules they are aware of
- Individuals shall always carry their Sentinel card when on managed infrastructure and present their card for checking upon request.
- Where accountable; undertaking 100% verification checks on Sentinel cards before allowing Individuals to start work

Breaches of the Sentinel Scheme Rules

Breaches of the Sentinel Scheme Rules by either an Individual or a Sponsor include (but are not limited to) the following:

- Any action of theft, attempted theft, fraud, or falsification of documentation or records;
- Any conviction related to theft or attempted theft of railway materials
- Any breach of the Drugs and Alcohol policy, including reporting or endeavouring to report to site under the influence of drugs or alcohol or being in possession of illegal drugs on site, either for sale or personal use;
- Any breach in working hours, including reporting or endeavouring to report for a shift of work, having previously undertaken a shift on NRMI within the last 12 hours (known as double-shifting); unless a risk assessment has been conducted by the Primary Sponsor and suitable controls implemented.
- Any event of presenting a falsified or altered Sentinel Smart Card, or claiming a false identify for the purposes of trying to gain entry on NRMI;
- The infringement of any health and safety rules;
- Any event of negligence which causes, or has the potential to cause loss, damage or injury;
- Any event of physical violence while at work;
- Any event of deliberate damage to NRMI property;
- Any breach of confidence;
- Any breach of the Lifesaving Rules
- Any failure to investigate an alleged breach of the Sentinel Scheme Rules for an Individual they currently sponsor or sponsored at the time of the alleged breach. (This also applies where investigations are undertaken, but are deemed inadequate at Formal Review)
- Any allegation of a breach of the Sentinel Scheme Rules which is found to be false and is proven to have been made with malicious intent.
- Any other event that brings the Sentinel Scheme into disrepute

Health and Safety Policy

The objective of the company policy, as a fundamental part of its Health and Safety management system and in accordance with the Health and Safety At Work Act 1974 is to prevent, insofar as is reasonably practicable during the course of the work or duties being undertaken, any accidental occurrence which may directly or indirectly result in:-

- Injury or occupational ill health to any person
- Damage to or loss of any plant, equipment, property, materials or products.
- Delays in any processes or operations
- Events, Which may otherwise be detrimental to efficiency
- Adverse impact upon the environment

The application and promotion of the policy is the responsibility of Universal Group Senior Management. Whilst duties and tasks may be delegated the overall responsibility remain that of Senior Management to ensure that Universal Group complies with all relevant statutory Health and Safety Legislation, Approved Codes of Practice, and Rail Industry Standards.

Universal Group

- Treats Health and Safety as seriously as other aims.
- Believes that injuries and occupational illness can be prevented.
- Will set and maintain high standards of Health and Safety at all locations.
- Works in accordance with Network Rail's contract requirements safety

Universal Group aims to act responsibly to ensure, so far as is reasonably practicable, the health and safety of all persons under its control, regardless of employment status, (referred to as 'employees') whilst at work.

Universal Group will:

- Manage the business responsibly with regard to compliance with all relevant Health and Safety legislative requirements, including the provision of suitable insurance cover with reputable insurers
- Set and Monitor safety objectives.
- Be committed to continual improvement in safety performance.
- Provide and maintain safe systems of work which will minimise risk to health.
- Carry out an assessment of risk for all person whilst at work.
- Provide sufficient resources for the management of health and safety.
- Provide such information, training, and supervision as is necessary to promote the health and safety of its employees.
- Seek the full co-operation of employees and clients in implementing this policy and promoting good safety practices.
- Encourage safe behaviours and commit to re-educating unsafe behaviours.
- Ensure all employees are fit for the work they are required to do.
- Minimise risk of injury or illness created by work activities.
- Ensure that Senior Management actively involve the workforce – including part-time and agency workers – as part of a developing health and safety culture.
- Ensuring that all reported incidents, hazards, or refusals to work are addressed appropriately and reprisals against employees are not tolerated at any level
- Maintain external safety-related certifications, for example, where ISO 45001:2018 is held.

Each employee has a duty to co-operate by:

- Complying with appropriate legal requirements and company health and safety rules.
- Wearing and using the protective clothing and equipment provided.
- Applying good housekeeping to work areas.
- Reporting serious or imminent danger, incidents or hazards which could lead to injury or damage; refusing to work where any employee genuinely feels there is a risk to their own, or other's Health and Safety, infrastructure or Environment.
- Attending safety training in accordance with Universal Group requirements.
- Working safely in the interests of themselves and others.

In addition to the basic Health and Safety arrangements outlined in the above policy, special procedures need to be adopted and applied in relation to railway work. This policy will be reviewed annually, as a minimum.

Signed 
Managing Director

Dated 14/06/2022

Environmental Policy

The objective of the company policy, in unison with its Health and Safety management system, is to comply with all duties bestowed on Universal Group in accordance with the Environmental Protection Act 1990.

Universal Group is committed to achieving environmental best practice throughout its business activities wherever practicable. Universal Group recognises that economic growth, development and a healthy environment must be closely linked.

Environmental protection and sustainable development are responsibilities that government, business, communities, and individuals should strive towards. Where possible environmental management issues will be integrated with Health and Safety and other operational systems in line with overall business objectives of Universal Group.

Universal Group is aware of Network Rails Company Standard *Contract Requirements Environmental*, and is committed to the promotion of, and compliance with, environmental best practice.

Universal Group is committed to:

- Minimising the use of energy, water and other natural resources in operations.
- Minimising waste and identify the best environmental option for disposal.
- Considering the effects our activities may have on the environment; commit to protecting the environment and minimize the environmental impact of aspects of work activities that are environmentally significant.
- Preventing Pollution
- Considering opportunities to make a positive contribution to the environment in all activities
- Reducing the impact of our activities on adjacent businesses and residents and behave as a 'good neighbour'.
- Encourage active participation from company staff at all levels in improving environmental performance.
- Minimizing the environmental impact, for the life cycle (including disposal), of plant, equipment, and all physical assets.
- Minimise noise nuisance, especially on site where the public or residents may be affected (including night work).
- Setting and Monitoring environmental objectives
- Maintain external Environmental-related certifications, where these are held.
- Continually improving its environmental performance.

The principles detailed above apply to all Universal Group business activities, including work in the Rail Industry.

Universal Group will comply with its client's environmental requirements, and work closely to ensure its impacts are as small as reasonably practicable.

This company will be communicated to all interested parties on request.

This policy will be reviewed annually, as a minimum.

Signed 
Managing Director

Dated 14/06/2022

Quality Policy

Universal Group aims to provide defect free goods and services to its customers on time and within budget.

Management is committed to:

- Develop and improve the Quality System
- Continually improve the effectiveness of the Quality System
- The enhancement of customer satisfaction.

The management has a continuing commitment to:

- Ensure that customer needs and expectations are determined and fulfilled with the aim of achieving customer satisfaction
- Communicate throughout Universal Group the importance of meeting customer needs and legal requirements
- Establish the Quality Policy and its objectives
- Ensure that the management review meetings sets and reviews the quality objectives, and reports on the Internal audit result as a means of monitoring and measuring the process and the effectiveness of the Quality System
- Work with suppliers, customers, and other interested parties to establish and maintain the highest quality standards
- Ensure the availability of resources
- Maintain external quality-related certifications, where these are held

Universal Group complies with all UK and EU legislation and regulations specifically to its business activities.

This policy will be reviewed annually, as a minimum.

Signed 
Managing Director

Dated 14/06/2022

First Aid Policy

Universal Group maintains 1 in 50 staff trained in First Aid at Work. This is monitored by the HR department, who monitor competency and re-training through the training database.

Where individuals are involved in works of a short duration, or transient worksites, first aid boxes will be provided within vehicles. It is essential that the contents of the First aid boxes are monitored and maintained with adequate stock Levels.

If the type of work involves higher than normal risks for staff working on track, a risk assessment will be carried out and a new ratio applied for that specific project.

The Work Package Plan will detail the first aid arrangements on site, although Universal Group would expect the Principal contractor on any site to provide adequate facilities. This will be reviewed with any contract that requires a presence on site.

Adequacy of First Aid cover is reviewed regularly at management meetings.

Special consideration will be given to availability of first aid for staff working alone.

This policy will be reviewed annually, as a minimum.

Signed 
Managing Director

Dated 14/06/2022

Fatigue Management (Working Hours) Policy

This statement sets out the policy of the company for fatigue management; specifically, those activities or tasks identified as 'safety critical work' and where fatigue could result in impaired performance and cause an increased operating risk. This includes works carried out by any employees, agency, contractors, or subcontractors under our control, in compliance Client and Infrastructure Manager requirements, legislation and applicable rail industry standards.

A copy of the relevant standards and legislative requirements are held by the signatory of the policy statement in the main offices of , should a fuller interpretation be required and forms the basis for the following synopsis.

will take all reasonable measures to ensure that those employees are made aware of the contents of this policy and the effect of their continued employment by the company in the event of any breach of this policy. will take all reasonable measures to prevent, so far as is reasonably practicable, any breach of duty placed on any person by this policy by scheduling work patterns and monitoring compliance. If appropriate, this will be done in liaison with the client. Employees of will at all times exercise diligence in monitoring their hours worked, including any other/additional employment working, to ensure overall compliance with the limitations detailed below. The company will, where appropriate, conduct fatigue risk assessment and will not, under any circumstance, roster or plan working hours in excess of those defined within legislation and applicable rail industry standards.

It is a condition of employment with the company that all employees shall comply with the following:

- Shifts not to exceed 12 hours
- No more than 72 hours to be worked in any 7 days period
- Must not work more than 13 shifts in 14 days
- Must not have less than 12-hour rest periods between consecutive shifts.
- Not exceed more than 14 hours 'door-to 'door'

Universal Group will not accept any deviation from the above conditions unless emergency conditions prevail, in which case a risk assessment will be carried out to ensure the risks associated with the additional working hours, to those rostered, are suitably mitigated to prevent worker(s) becoming unfit for work through excessive fatigue. No other employment working times should impact on the above to either exceed the limitations or compromise the flexibility of the workforce of Universal Group.

Universal Group will ensure that working hours are planned utilising the Labour Control System. The system will not allow exceedance of working hours as detailed above. Actual worked hours will be reported by timesheet utilising the Evo-M systems. Any identification of exceedances at this point will be reported to the Rail manager for investigation.

In order to comply with this policy and to maintain the stated and accepted standards of employees should at all times:

- Avoid, wherever possible, other employment working times which could impact on the above to either exceed the limitations or compromise the flexibility of the workforce of the company.
- Notify the signatory of this document should other employment working times impact on the limitations outlined.
- Refer to the signatory of this document should a more detailed review of the legislation and applicable rail industry standards be required to ensure full understanding and compliance.

The Risk Assessment process for exceeding working hours in an emergency situation must be in compliance with rail industry standards and the ROGS 2006 (Railway & Other Guided Transport Systems) (as amended) regulations and include recorded verbal communication between line management and other associated operators to confirm the details of hours worked to date and proposed hours to be worked in excess of normal limits plus the work to be undertaken and prevailing conditions.

Only if fully satisfied that the additional working requirement is necessary and urgent and that workers on site have no objections especially safety ones then confirmation can be given to extend the working pattern to tight constraints, with safety as the overriding factor, and with the intent to relieve staff that have triggered an exceedance at the earliest opportunity. Records of the Risk Assessment review shall be recorded including who has been involved in the discussion, the times etc.

In order to prevent staff suffering fatigue as a result of excessive driving requirements, will always endeavour to appoint staff who live locally to the work location. Where this is not possible, we will try to limit driving to and from the location of work to 1 hour at each end of the shift.

This policy will be reviewed annually, as a minimum.

Signed



Managing Director

Dated

14/06/2022

Refusal to Work Policy

This statement sets out the policy of Universal Group, in respect of “Refusal to work on the grounds of Health & Safety” by all employees (or sub-contractors, if appropriate).

A copy of the above referenced document is held by the signatory of the policy statement in the main offices of Universal Group, should a fuller interpretation be required and forms the basis for the following synopsis.

All employees referred to above are to be made aware of the contents of this policy and become familiar with the conditions laid down.

Universal Group will take all reasonable measures to ensure that those are made aware of the contents of this policy and that it will not affect their continued employment by the company in the event of any invoking of this policy.

Universal Group 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. Employees of Universal Group will at all times exercise diligence in monitoring their safe working environment for themselves and other employees in the working area.

It is a condition of employment with the company that all employees 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.
- If the situation gives rise to serious or imminent danger, or if line management cannot be immediately contacted, then employees must stop work, retire to a place of safety and report it immediately. Warn others who may be exposed to the same danger of the concerns you have.
- Double check that there are no instructions or information available locally to resolve the issue.
- Do not recommence work until management have been alerted and the situation addressed.
- If the line manager does not support your concerns, or there is any conflict or disagreement, escalate the concern through the line manager or on-call manager chain. The case can be escalated up to and including the Managing Director, will normally make the final decision; application to external sources may be consider, e.g. ACAS.
- Ensure that you are clear in describing what the concerns or issues are.
- Employees must only raise a refusal to work where they have a genuine concern for health, safety, or welfare. Where this is the case, all employees can raise a refusal to work without fear of discrimination. No employee will be subject to any disciplinary action or suffer any detrimental or punitive action, even if the concern is ultimately seen to be unfounded.

Further to the Universal Group processes for refusal to work on the grounds of health and safety, all staff engaged in the railway infrastructure have a facility for reporting any safety concerns into a central, confidential reporting system, CIRAS (Confidential Incident Reporting & Analysis System)

CIRAS is an alternative way for rail industry staff to report safety concerns that they feel unable to report through company safety channels. It is a completely independent and confidential way to report safety concerns without fear of recrimination.

Reports can be made by Free phone 0800 4 101 101, by writing to Freepost CIRAS, or via the CIRAS Website at www.ciras.org.uk

All welfare and first aid facility related issues must be addressed by the company to ensure that their operators are supported in line with the appropriate legislation defining the facility required and who is to provide them, in line with the attached form.

This policy will be reviewed annually, as a minimum.

Signed 
Managing Director

Dated 14/06/2022

Alcohol and Drugs Policy

This statement sets out the policy of the company in compliance with the current version of Rail Industry Standard RIS-8070-TOM and Company standard NR/L1/OHS/051 in respect of any employee, self-employed person, or contractor under our control. It affects those whose proper performance of their duties is, or may be, impaired or otherwise affected as a result of the consumption of alcohol and/or illegal substances (or prescribed drugs in certain circumstances). Client and Infrastructure Manager requirements for all operations will be adhered to at all times.

Provided that employees referred to above adhere to the provisions contained within this policy, then they will normally be considered to have demonstrated compliance with the conditions of employment or contract insofar as they refer to the use of alcohol and drugs.

All employees referred to above are to be made aware of the contents of this policy and become familiar with the conditions laid down. The company will take all reasonable measures to ensure that those employees are made aware of the contents of this policy and the effect on their continued employment by the company in the event of any breach of this policy. The company will take all reasonable measures to prevent, so far as is reasonably practicable, any breach of duty placed on any person by this policy.

Employees of the company will at all times exercise diligence in monitoring their colleagues and others who from time to time may be under the control of the company and noting and reporting any evidence of alcohol and/or drug abuse.

Should any employee suffer any problems or difficulties in respect of the misuse of drugs and/or alcohol, or should they have reason to believe that a colleague may be experiencing such difficulties, they may approach the signatory of this policy. That person will at all times treat any information provided in complete confidence and will take such measures that are deemed necessary to ensure that the matter may be resolved with the minimum of distress to the person concerned and any others who may be affected.

Where rail operations are undertaken, the standards identified above will be adhered to. It is under these standards that as a condition of employment by the company, no person referred to above shall:

- Report, or endeavour to report, for duty whilst under the influence of alcohol or drugs (including any prescribed drugs that may have impair work ability)
- Report, or endeavour to report, for duty whilst in an unfit state due to the previous consumption of alcohol or drugs (including any prescribed drugs that may have impair work ability)
- Be in possession of alcohol or non-prescribed drugs during working hours
- Consume alcohol or non-prescribed drugs during working hours

Employees must subject themselves to medical checks (routine, unannounced (safety critical staff only) or "for cause") to verify compliance, as per their contract of employment. Refusal or failure to pass any test will be classed as gross misconduct and may result in instant dismissal.

Failure to maintain the standard set out by this policy will be considered as gross misconduct and a breach of the Sentinel Scheme Rules; appropriate action will be therefore be taken in all cases.

Unannounced, random testing will be undertaken to ensure a minimum of 5% of safety-critical staff are tested during each calendar year, or between external audit events, whichever is sooner.

In order to comply with this policy and to maintain the stated and accepted standards of the company, those employees referred above should, at all times avoid:

- Consuming alcohol or non-prescribed drugs in the twelve (12) hrs immediately preceding attendance at work
- Consuming alcohol or non-prescribed drugs during meal or other break times
- Consuming alcohol or non-prescribed drugs during working hours
- Consuming alcohol or non-prescribed drugs whilst not in work but "on-call"

In addition, those employees to which this policy applies must ensure that the signatory of this policy is made aware of any over-the-counter or prescribed medication being taken, which may in any way affect their performance at work and the nature of any such medication which it is necessary for them to carry with them during working hours.

This policy will be reviewed annually, as a minimum.

Signed 
Managing Director

Dated 14/06/2022

Medical Fitness Policy

Meeting the medical fitness requirements indicates that a person is sufficiently medically fit to look after their own safety when on or near the line and this has to be verified in line with company standard NR/L2/OHS/00124. It shall not be assumed that the person concerned is medically fit to undertake safety critical work or engineering work on or near the line.

Medical assessments are to meet the requirements of company standards NR/L2/OHS/00124. Medical assessments shall only be carried out by or under the supervision of a registered medical practitioner with experience of occupational medicine. Also have an understanding of the hazards of the trackside environment, and how lack of fitness could reduce the effectiveness of safety systems of work intended to control those hazards.

Where a person does not meet all of the medical requirements at a medical assessment, a decision to permit that person to continue to hold a PTS certificate may be taken by a railway group member. The advice of the occupational physician shall be obtained on the likely effects on the ability of that person to look after their own safety when on or near the line and appropriate measures to mitigate those effects.

Management will:

- Document the measures taken to mitigate any adverse effects identified.
- Inform the person concerned and their immediate manager of any restrictions
- Assess and make any necessary changes to their system of work
- Ensure the employees PTS certification is endorsed with the relevant symbol, (red triangle, blue circle) that pertains to their identified limitation.
- Document the processes for ensuring that any restrictions or changed systems of work are communicated to the employee and all relevant personnel, i.e. COSS

The Rail Manager is responsible for maintaining the information on Universal Group staff database and using the competency management database to produce reports detailing when age related medical re-examinations are due.

The below table details the maximum validity of the medical certificate, relative to the age of the employee.

Age at Date of Medical Assessment and A&D Test	Maximum Validity of Medical
Less than 40	10 years
From 40 to 65	5 years
65 years and Beyond	Annually

Obesity shall be assessed by the Medical Examiner to determine whether it is likely to limit mobility or be related to any medical abnormality that could increase the risks to safety while working.

The Rail Manager has the responsibility to ensure that he and the employee come to a clear understanding of the identified limitations. This will be documented as an instruction and signed by all appropriate parties to record understanding and acceptance as a declaration.

The employee must report any medical conditions as advised by his/her own GP. It is the responsibility of the employee to communicate his/her limitations to the rest of the working team.

All relevant medical records and documented restrictions will be held on the employee's personal file, in line with the data protection act.

This policy will be reviewed annually, as a minimum.

Signed 
Managing Director

Dated 14/06/2022

Accident/Incident/Near Miss/Close Call Reporting Policy

All accidents or incidents, including near misses and Close Calls, must be reported immediately by telephone to the Rail Manager or the on-call Universal Group representative if out of office hours. The Universal Group representative must then inform the Rail Manager at the first possible opportunity. This must be followed up by the completion of an accident/incident form.

This policy will also be adopted with the reporting of events resulting in pollution and or damage to the environment, property and or equipment in accordance with the Universal Group Environmental policy. Environmental accidents and incidents will be reported to Network Rail via arrangements detailed in the applicable method statement or Work Package Plan.

Universal Group will ensure that all accidents and incidents affecting their staff working on Rail projects will be fully investigated in accordance with NR/L2/INV/002. Universal Group will exchange information and cooperate with clients to ensure accidents and incident investigations are comprehensive and produce practical recommendations.

The Rail Manager will report all accidents and incidents to the Client within 4 working days or to Network Rail within 5 working days for inclusion in the Network Rail SMIS (Safety Management Information Systems) database.

When applicable, the person nominated as responsible for RIDDOR reporting will report events/occurrences to the enforcing authorities (HSE, ORR) in accordance with the RIDDOR regulations and RIS-8047-TOM.

Universal Group will carry out its own investigation in accordance with NR/L2/INV/002, and publish conclusions, observations and recommendations which will be notified to other staff to avoid similar events and learn from previous experiences.

Universal Group will promote a no blame culture and promote the reporting of near misses or unsafe practices.

Accident books will be maintained at all sites and completed when an accident occurs. All staff working on client sites and offices will complete local accident books.

All records will be kept for 5 years

Accidents and incidents affecting Universal Group staff are discussed at management meetings.

This policy will be reviewed annually, as a minimum.

Signed 
Managing Director

Dated 14/06/2022

Bribery and Corruption Policy**BRIBERY AND CORRUPTION POLICY STATEMENT**

The Bribery Act 2010 came into force on 1 July 2011. It creates various new offences, including an offence which can be committed by commercial companies that fail to prevent persons associated with that company from committing bribery on their behalf. This applies regardless of whether the person works or commits the offence in the UK or any other country in which the company operates. However, it is a full defence for a company if it can prove that despite the bribery occurring, it has adequate procedures in place to prevent those persons associated with it from committing bribery. The company's procedures must be proportionate to the bribery risks that it faces in relation to the nature, scale and complexity of the company.

The company and its directors are committed to the prevention of bribery by those employed and associated with it. The company is committed to carrying out business fairly, honestly and openly, with zero-tolerance towards bribery. This is achieved by:

- carrying out a risk assessment to ascertain the risk of bribery
- instigating procedures proportionate to that risk
- having good internal controls and record-keeping
- securing the commitment of directors, managers and all staff to the prevention and detection of bribery
- developing a culture in which bribery is unacceptable
- undertaking due diligence procedures proportionate to the assessed risk of bribery
- effectively communicating the anti-bribery policy to all staff
- training all staff to recognise bribery so that they can avoid it and be alert to possible instances of bribery
- having clear procedures on what to do should bribery be suspected
- training all staff so that they are aware of what to do should they discover a possible instance of bribery
- monitoring and reviewing the effectiveness of the bribery procedures and updating them as necessary to ensure that they remain effective.

SCOPE

This policy applies to all those employed by and associated with the company.

OFFERING BRIBES

The company expressly prohibits any person employed by or associated with it from offering, promising or giving any financial or other advantage to another person where it is intended that the advantage will bring about improper performance by another person of a relevant function or activity, or that the advantage will reward such improper performance.

The company prohibits any person employed by or associated with it from offering, promising or giving any financial or other advantage to another person where it is believed that the acceptance of the advantage offered, promised or given in itself constitutes the improper performance of a relevant function or activity.

ACCEPTING BRIBES

The company expressly prohibits any person employed by or associated with it from requesting, agreeing to receive or receiving any financial or other advantage with the intention that a relevant function should be performed improperly as a result of the advantage or as a reward for performing the relevant function improperly.

The improper performance of a relevant function in anticipation of receiving financial or other advantage is also prohibited.

BRIBING A PUBLIC OFFICIAL

The company expressly prohibits the bribing of a UK or foreign public official in-order to obtain or retain business or an advantage in the conduct of business.

RELEVANT FUNCTIONS AND ACTIVITIES

Relevant functions and activities are any function of a public nature, any activity connected with the business, any activity performed in the course of a person's employment and activity performed by or on behalf of a body of persons where the person performing that function or activity is expected to perform it impartially, in good faith, or is in a position of trust by virtue of performing it.

HOSPITALITY AND BUSINESS GIFTS

The Bribery Act 2010 does not seek to prohibit reasonable and proportionate hospitality, advertising, sponsorship and promotional or other similar business expenditure, as it is recognised that this constitutes an established and important part of doing business.

However, hospitality, promotional and similar business expenditure can be used as bribes.

The Company expressly prohibits the giving and receiving of hospitality/business gifts and similar where the intention in doing so is to receive or confer an advantage in return for giving or receiving the hospitality/business gift or similar.

The following procedures should be adopted in relation to hospitality and business gifts.

- All offers of business gifts should be referred to the anti-bribery officer and should only be accepted if clearance has been received from him or her.
- Business gifts should not be made without the permission of the anti-bribery officer.
- A record of all business gifts made and received and the reason for the gift should be retained.
- All hospitality must be proportionate and reasonable and in line with the Company's hospitality policy. Guidance should be sought from the anti-bribery officer as to whether the planned hospitality is proportionate and reasonable.
- Records should be maintained of all hospitality provided and accepted, including cost and reason for providing or accepting the hospitality.
- Quid pro quo arrangements are expressly prohibited.
- Cash gifts are expressly prohibited.
- The provision or acceptance of entertainment of a sexual nature is expressly prohibited.
- Acceptable hospitality and entertaining may include modest meals with people with whom we do business (such as providing a modest lunch after a meeting) or the occasional provision of or attendance at sporting or cultural events, provided that the intention is to build business relationships rather than to receive or confer an advantage.
- The provision of small promotional gifts, such as diaries, pens or similar, will generally be regarded as acceptable.
- Staff reviewing expense claims should be alert to the provision of hospitality/business gifts that may be construed as a bribe.
- All concerns should be reported.

NEW BUSINESS, CHANGE IN BUSINESS AND CONTRACTS WITH EXTERNAL PARTIES

Where you develop or seek to develop new avenues for business or new contracts, or where the nature of the business changes, you should inform your line manager of this in order that due diligence and a risk assessment of the circumstances can be undertaken.

Where a business relationship with an external party is sought or newly established, or the nature of the relationship is changed, appropriate due diligence must be exercised to ensure that there are no circumstances giving rise to a concern. That external party must also be made aware of this anti-bribery policy.

FACILITATION PAYMENTS

Facilitation payments are small bribes that are paid to speed up or facilitate government action. Although they are commonplace in some foreign countries, they are regarded as bribes and are illegal under the Bribery Act 2010.

The Company expressly prohibits facilitation payments of any sort.

Any member of staff placed under pressure to make a facilitation payment should refer the matter to the anti-bribery officer immediately.

DONATIONS

The Company expressly prohibits the giving of donations to political parties.

Any charitable donation must be consistent with the Company's policy on charitable giving and with the knowledge and consent of the anti-bribery officer.

The Company expressly prohibits the making of charitable donations where the purpose of the donation is to secure an advantage. All charitable donations must be made without expectation of reward.

REPORTING CONCERNS

All members of staff have a responsibility to prevent, detect and report all instances of bribery. Staff should therefore be alert to the possibility of bribery.

Anyone who has concerns regarding acts or potential acts of bribery should speak to their line manager in the first instance.

If for any reason a person is not able to speak to his or her line manager, he or she should contact the anti-bribery officer.

All reports will be treated with the utmost confidentiality. However, concerns can be reported anonymously to the anti-bribery officer.

Further information about reporting concerns is available in the company's Grievance policy.

TRAINING AND COMMUNICATION

All staff will receive training on the anti-bribery policy to ensure that they understand both the policy and the procedures that they need to follow in order to comply with it.

A copy of the policy will be included in the Company's policies.

All staff are expected to familiarise themselves with the anti-bribery policy and to sign a copy of the policy to confirm that they have read and understood it.

Changes to the policy and procedures will be communicated to staff in an appropriate manner.

RESPONSIBLE OFFICER

The commercial and office manager is responsible for monitoring the anti-bribery policy and all questions and concerns should be referred to same.

SANCTIONS

The Company treats breaches of the anti-bribery policy with maximum seriousness and will investigate any potential breach in accordance with the disciplinary policy. The ultimate sanction for a breach of the policy will be summary dismissal for gross misconduct.

REVIEW

This policy will be reviewed annually, as a minimum.

Signed 
Managing Director

Dated 14/06/2022

Modern Slavery Policy

As an Employer, Universal Group have a legal obligation to prevent the use of slavery, servitude and forced or compulsory labour and human trafficking and are committed to supporting fundamental human rights in our workforce and supply chain.

The Managing Director takes personal responsibility for preventing modern slavery within the business.

We are committed to acting ethically in all our business dealings and relationships and that our business partners and suppliers also act in a like manner, upholding high standards, with the aim being to stop any opportunities for 'modern slavery' occurring within our business or our supply chain.

We will make sure that we address all, and directly prohibit practices known to contribute to the risk of modern slavery; we will, therefore:

- Never use slave labour, illegal child labour or forced labour.
- Ensure that the overall terms of employment are voluntary.
- Ensure we follow all local applicable laws pertaining to minimum age requirements, wages, number of hours worked in a seven day week, overtime and benefits.
- Require that the supplier of any products, materials, or services to Universal Group comply with the laws regarding human trafficking and slavery in the country or countries of their origin and use.
- Ensure that we maintain awareness of our commitment to preventing modern and how to recognise the signs in the supply chain and how to raise the alarm. All staff can approach management to raise such concerns in confidence, where issues raised can be dealt with appropriately.

All management and staff are required to apply due diligence to spotting the signs of modern slavery, whether in the business or the supply chain to and bring any concerns without delay. Any purchasing, including material or labour sourcing placements or decisions that could increase the risk of modern slavery must be thoroughly analysed to ensure the risk is avoided.

All staff can also report a suspicion or seek advice by contacting the Modern Slavery Helpline confidentially on 08000 121 700. This is open 24 hours a day, 365 days a year.

Should you wish to remain anonymous you can contact Crime stoppers on 0800 555 111.

Always call 999 if there is a crime in action or immediate threat to life.

This policy will be reviewed annually, as a minimum.

Signed 
Managing Director

Dated 14/06/20

