

Foreword

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

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

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



Dave Cormack
Managing Director
August 2021

1.0 The Philosophy of the Board

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

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

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

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

2.0 General Statement of Intent

2.1 Health, Safety and Welfare

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

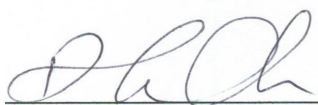
We acknowledge Health, Safety and Welfare are a management responsibility and are of equal importance to all other parts of the business. It is to be actively pursued through the continuing development of employee competence and the provision of expert advice to achieve progressive improvements in Health,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

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

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

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

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



Dave Cormack
Managing Director
August 2021

2.2 Worksafe Policy

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

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

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


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

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

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

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

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



Dave Cormack
Managing Director
August 2021

2.3 Environmental Policy

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

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

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

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

This policy will be reviewed on an annual basis.



Dave Cormack
Managing Director
August 2021

2.4 Counterfeit, Fraudulent & Suspect Items

Introduction

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

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

Counterfeit

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

Fraudulent

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

Suspect

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

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

Item

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

What can we do?

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

Supply Chain

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

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

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

CE Marking

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

What is the CE mark?

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

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

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

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

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

If you are a manufacturer it is your responsibility to:

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

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

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

Trade Associations

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

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

Communication with Staff

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

General

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

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

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

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

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

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



Dave Cormack
Managing Director
August 2021

2.5 Corporate and Social Responsibility Policy

1. Introduction

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

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

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

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

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

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

2. Our Values

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

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

Our values are:

Honesty

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

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

Responsibility

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

Efficiency

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

Pride

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

Professionalism

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

Safety

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

3. The Policy

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The Directors are responsible for the implementation of this policy and will make the necessary resources available to realise our corporate

responsibilities. However the responsibility for our performance to this policy rests with all employees throughout the company.



Dave Cormack
Managing Director
August 2021

2.6 Anti-Bribery Policy

1. Introduction

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

2. Scope of this Policy

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

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

This Policy covers:

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

3. The Bribery Act 2010

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

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

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

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

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

Prosecution and Penalties

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

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

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

4. What is prohibited

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

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

5. Records

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

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

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

6. Corporate Entertainment, Gifts, Hospitality & Promotional Expenditure

6.1 Provision

Principle

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

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

provided that it is:

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

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

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

Procedure

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

Employees are required to set out clearly:

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

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

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

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

Personal Friendships

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

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

6.2 Receipt

Principle

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

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

6.2.1 Gifts

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

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

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

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

Exceptions to the above are:

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

6.2.2 Personal Friendships

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

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

6.2.3 Travel / Accommodation Expenses

The following may not be accepted:

- a) Payment of abnormal business travel / accommodation expenses.

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

6.2.4 Entertainment

The following may not be accepted:

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

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

7. Charitable Events

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

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

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

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

8. Conflict of Interest

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

Employees are required to disclose in writing to a Director any propriety or other financial interests that they may have in any organisation with which the Company does business with or with which it is in competition with in order that a determination may be made as to whether any conflict of interest arises. Reference should also be made to Conditions of Employment.

Employees that deal with outside organisations in the purchase of products, materials or services or who are in a position to influence such purposes

should have no propriety or other financial interest either in those organisations furnishing such products, materials, or services or in any transaction for the furnishing of such products, materials or services.

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

9. Reporting Suspected Bribery

Principle

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

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

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

Procedure

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

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

Action by the Company

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

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

10. Review of procedures and training

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

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

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

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

11. Breach of Policy

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



Dave Cormack
Managing Director
August 2021

2.7 Quality Statement

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

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

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

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

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

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

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

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

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



Dave Cormack
Managing Director
August 2021

2.8 Business Continuity Plan

12. Introduction

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

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

13. Scope of this Plan

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

14. Assessment

Office

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

Communication:

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

Email communication is accessed via office PCs and mobile devices.

Fax is still in use but is not used for any key communications. Fax use is declining and is not considered key in any way.

IT:

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

Stores

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

Stock & Stock Records:

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

Equipment

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

Stores Area

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

Workshop

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

Equipment:

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

Workshop Area:

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

Financial

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

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

15. What Could Happen

Fire
Theft
Flood
Terrorism / attack

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

16. What is in Place

Insurance

The company will hold the following insurance policies:

Combined Commercial Insurance including Buildings, Contents and Business Interruption.
Directors & Officers Insurance with Legal Cover.

Fire

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

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

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

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

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

Disease outbreak

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

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

To this end the Company will:

- Promote awareness and understanding of the issues and concerns relating to the transmission of infectious diseases in the workplace.
- Provide information on the nature and spread of common infectious diseases, including how to identify the symptoms and signs and the

procedures to be followed in the event of individual illness or an outbreak affecting a significant number of employees.

- Take decisions to exclude persons who may have or deemed to have an infectious disease with the interest to protect the health of other Delphini employees.

Maintenance

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

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

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

Security

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

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

CCTV Cameras which can be accessed remotely are also installed.

Storage

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

Human Resources

The company issues all staff the following:

Employment Contract
Staff Handbook
Employment and Policies Procedures

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

17. The Plan

Office

Communication:

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

Telephones:

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

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

IT:

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

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

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

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

Stores

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

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

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

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

Purchase of consignment stock.

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

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

Collection of goods from suppliers for delivery.

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

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

Workshop

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

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

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

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

18. Communication to the Outside World

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

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

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

19. Assessment and Trial

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

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

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

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

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

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

2.9 Drugs and Alcohol Policy

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

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

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

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

Policy

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

It is a requirement that no employee or contractor shall:

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

Alcohol Consumption Guideline

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

Prohibited drugs

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

- Cannabis
- Cocaine
- Amphetamines

- Barbiturates
- Benzodiazepines
- Dextrapropoxyphene
- Methadone
- Opiates.

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

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

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

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

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

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

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

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

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

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



Dave Cormack
Managing Director
August 2021

2.10 Infectious Diseases in the Workplace Policy

1. Introduction

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

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

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

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

2. Business case

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

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

3. Minimising the risk of disease transmission

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

To this end the Company will:

- Promote awareness and understanding of the issues and concerns relating to the transmission of infectious diseases in the workplace.

- Provide information on the nature and spread of common infectious diseases, including how to identify the symptoms and signs and the procedures to be followed in the event of individual illness or an outbreak affecting a significant number of employees.
4. Standard hygiene practices at work

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

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

Employees are encouraged to adopt effective hand hygiene practices including:

Frequently and thoroughly clean hands with an alcohol-based hand sanitizer or, ideally, soap and water. Wash thoroughly for a minimum of thirty seconds.

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

Avoid touching your eyes, nose or mouth.

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

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

5. When employees have contracted infectious diseases

Employees with infectious diseases will not be excluded from work, nor have their duties restricted,

provided they are physically and mentally fit for work and their continued attendance in the workplace

does not present a significant risk of disease transmission to other employees or customers.

The decision as to whether or not an employee with an infection should stay away from the workplace

will take into account:

- How the infection is transmitted and the ease of transmission.
- The typical duration of the infection; and

- The potential harm that the infection can cause to other employees and customers.

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

6. Personal protective equipment

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

7. Disease outbreak

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



Dave Cormack
Managing Director
August 2021

2.11 Equality and Diversity Policy

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

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

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

Responsibility for this policy

The Directors have ultimate responsibility for this policy.

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

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

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



Dave Cormack
Managing Director
August 2021

2.12 Anti-Slavery and Human Trafficking Policy

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

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

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

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

This policy applies to all persons working for, or on behalf of this company, in any capacity. This includes but does not limit the policy applicability to; employees, agency workers, temporary staff, agents, contractors, external consultants and third-party representatives.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

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

You must notify your manager as soon as possible if you believe or suspect that, a conflict with, or breach of, this policy has occurred, or may occur, in the future.

Employees are encouraged to raise concerns about suspicions of Modern Slavery in any parts of our business or supply chains at the earliest possible stage (see 3.3). If you are unsure whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply

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

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



Dave Cormack
Managing Director
August 2021