


# POLICIES MANUAL 2024/25

Signed:   
David MacDonald  
Managing Director  
01/04/2024

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## **1. VISIONS & VALUES**

### **OUR VISION**

Earn the loyalty and trust of our clients by delivering Product, Service and Value which consistently meets client goals, and exceeds expectation.

### **OUR VALUES**

#### **Talented People**

Outstanding Quality, delivered by highly skilled, competent people diverse in range, with experience and knowledge enhanced through continual development.

#### **Excellence**

Service provided by the best people matched with the correct role with exceptional teamwork communication and leadership excellence in everything we do.

#### **Safety**

Safety embedded deep within our culture, built into every aspect of our business systems, behaviour, and culture.

#### **Communication**

Communicate effectively as a team and respect supply chain and client relationships.

## 2. HSEQ POLICY

It is the policy of Global Infrastructure to eliminate harm, reduce business risk and deliver sustainable, innovative high-quality products and services to our clients, by managing our business systems and procedures proactively.

Our strategy:

To review and evaluate our basic principles amending where necessary to ensure we continually exceed client expectation, consistently deliver exceptional standards, performance and quality with integrity and resilience, while bringing efficiency and value to the business, and to our clients.

In pursuit of this Policy, Global Infrastructure is responsible for and committed to:

- the health, mental well-being, and prevention of injury to all employees and persons under the control of Global infrastructure affected by our work activities. Through effective assessment, direct worker consultation, participation and communication, risks and hazards associated with the activities of the business - including risks associated with a pandemic, are identified, and mitigated effectively.
- developing our workforce by providing appropriate information, instruction, supervision, training, awareness, appropriate tools & equipment, to perform tasks competently and safely in the most efficient, ethical, sustainable manner.
- assessing strengths, weaknesses, opportunities, and threats appropriately across the business evaluating risk using a framework of procedures and safe systems of work which we continually monitor, evaluate, improve, and communicate. Consideration is given to all stakeholders and interested parties in applying the most appropriate, consistent control measures to satisfy legal, regulatory, industry, organisational, contractual and customer expectations.
- communicating the importance of this policy and its' implementation to all staff and site personnel, meeting legal, organisational and customer obligations. This is achieved through continual workforce engagement and open communication.
- sustainable development, transparency, and accountability, recognising our moral, ethical, and legal obligations to the protection of the environment, society, and the economy. We achieve compliance with regulations at local, national, and international levels. We use a systematic approach to establish, implement, and continually assess the most suitable mitigation measures to minimise environmental impact, prevent pollution, conserve natural resources, protect species and habitat, and reduce annually reported greenhouse gas emissions.
- the continual improvement of our Integrated Management Systems to enhance and improve Quality, Environmental Sustainability and Occupational Health & Safety performance across the business. In seeking ways to achieve this, annual specific, measurable, achievable objectives are established which we monitor, measure, analyse and evaluate, focusing on continuous improvement, risk management, leadership commitment, stakeholder engagement and legal compliance to maintain the highest of standards.

Everyone within the organisation has a responsibility for HSE&Q and is required to co-operate fully in the implementation of this policy, and all measures put in place by Global Infrastructure.

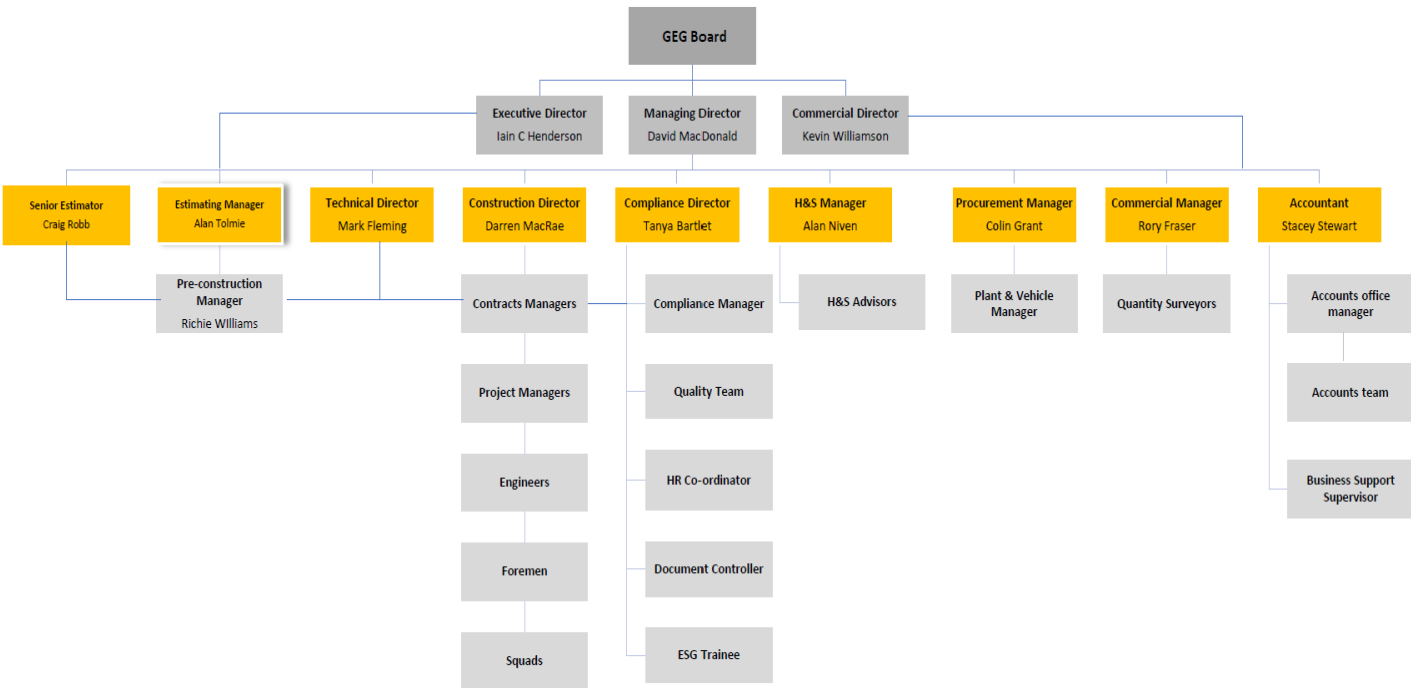
The Company shall communicate this Policy to all employees, and it will be freely available to customers, shareholders, contractors, the public and online at: [www.global-infra.co.uk](http://www.global-infra.co.uk).

This Policy is reviewed at least annually for its continuing suitability.



David MacDonald  
Managing Director  
01/04/2024

**BUSINESS  
ORGANOGRAM**



## **Roles & Responsibilities**

### The Directors

- Shall be responsible for implementation of the policy on a company-wide basis
- Shall ensure this policy is adhered to by all employees, and the company provide sufficient resources to meet this commitment.
- They will ensure sufficient allowance is made when pricing jobs, for the organisation and any sub-contractors to carry out work safely and without risks to health, and have particular responsibility for estimating & quantity surveying, administration & accounts staff.
- Give clear and precise instructions to those under their control about the safety of themselves and others who may be affected by their acts or omissions.
- They will ensure projects are planned, potentially harmful operations adequately controlled, and that information, instruction and training is provided wherever tasks involve significant risks to health and safety.
- Will consult with the workforce at all levels to ensure health safety and well-being of all persons operating under Global Infrastructure, are always considered.

### Health & Safety Manager

The company has appointed Alan Niven as the competent person to advise on all health and safety matters. He has the responsibility and authority to provide the directors with advice and recommendations on:

- Achieving the company's health and safety goals through monitoring workplace standards.
- Complying with current and new legislation.
- Seeking sources of expert advice where special risks arise.
- Providing adequate training and instruction for all employees.
- Responding to employees' concerns for their health and safety.
- New initiatives from attending regular industry and client forums.
- Key points from liaising with enforcing authorities and with client / customer safety departments.
- Feedback and ideas from regular company site safety forums.
- In addition, he will work closely with Project Managers in ensuring the preparation of adequate health and safety plans, method statements, and risk assessments.

### Construction Managers

- Will be responsible to the directors for ensuring the health, safety and welfare of employees, sub-contractors and anyone else affected by construction work at each stage of a project.
- Shall fully familiarise themselves with the safety policy and relevant legislation.
- They are responsible for providing site staff with adequate information to ensure the assessment of risks and their adequate control and ensure that all employees and sub-contractors who have obligations in the safety plan, know and carry out what is required of them.
- Encourage, by personal example, a positive attitude to safety when on site.
- Seek advice, when required, of the company health & Safety Manager in matters of health & safety.
- Carry out Site Start Safety Meetings and sub-contract safety meetings.
- Will consult with the workforce at all levels to ensure health safety and well-being of all persons operating under Global Infrastructure are considered, always.
- Participate in the company and site HS&E forums

### Project Managers

- Will be responsible to the Construction Managers for ensuring the health, safety and welfare of employees, sub- contractors and anyone else affected by construction work at each stage of a project.

- Have a key role to play in the day-to-day management of all site operations and site operatives, including sub-contractors' employees.
- Should understand the health & safety policy, procedures and relevant legislation and implement them.
- Will ensure safe systems of work are planned through worker participation and implemented in consultation with workforce and that all activities are carried out using competent persons and suitable equipment.
- Ensure that works are adequately always supervised.
- They are responsible for providing site staff with adequate information to ensure the assessment of risks and their adequate control and ensure that all employees and sub-contractors who have obligations in the safety plan, know and carry out what is required of them.
- Encourage, by personal example, the wearing of PPE and a positive attitude to safety when on site.
- Seek advice, when required, of the company health & Safety Manager in matters of health & safety.
- Carry out pre-start internal & subcontract safety meetings.
- Participate in the company and site HS&E forums
- Maintain safe access / egress to the workers place of work.
- Ensure all accidents, incidents and near hits are reported promptly.

#### Engineers

- Will be responsible to the Project Manager for ensuring the health, safety and welfare of employees, sub-contractors and anyone else affected by construction work at each stage of a project.
- Should understand the health & safety policy, procedures and relevant legislation and implement them.
- Will ensure safe systems of work are planned and implemented, and that all activities are carried out using competent persons and suitable equipment.
- Ensure that works are adequately always supervised.
- They are responsible for providing Foreman/Ganger with adequate setting out information to ensure the assessment of risks and their adequate control and ensure that all employees and sub- contractors who have obligations in the safety plan, know and carry out what is required of them.
- Encourage, by personal example, the wearing of PPE and a positive attitude to safety when on site.
- Seek advice, when required, of the company health & Safety Manager in matters of health & safety.
- Participate in the company and site HS&E forums
- Maintain safe access / egress to the workers place of work.
- Ensure all accidents, incidents and near hits are reported promptly.

#### Foreman / Gangers

- Continually assist in the development and maintenance of safe working practices.
- Participate in planning using POWRA and in the company and site HS&E forums.
- Ensure work is carried out to company standards with minimum risk to employees, other contractors and other persons.
- Encourage by personal example the wearing of correct PPE and a positive attitude to safety.
- Take an active part in induction and toolbox talks on site.
- Ensure all accidents, incidents and near hits are reported promptly.

#### Operatives

- Experienced employees may be required to oversee the work of apprentices/trainees and will be responsible for ensuring their health and safety.
- Participate in the planning using POWRA and participate in the company and site HS& E forums
- Co-operate with your supervisor and other company staff in complying with this policy and procedures and comply with any specific site rules
  - Use PPE and equipment in the correct and proper manner and report any defects.

- Take reasonable care for yours and that of your colleague's health, safety, and welfare.
- Report immediately, to your supervisor, any conditions or situations observed on site, that you consider unsafe or harmful to health.
- Ensure all accidents, incidents and near hits are reported promptly.

#### Commercial staff

- Observe the company health & safety policy and procedures and any specific safety rules whilst on company premises or sites.
- Ensure that persons under your control understand their task and work in a safe manner.
- When placing sub-contract orders, ensure that the health & safety requirements of the procurement procedures are followed.

#### Sub-Contractors

- Managers must ensure that sub-contractors selected to work for the company are competent in the tasks they carry out and receive a site induction.
- Participate in the site HS&E forums
- The sub- contractor is expected to equip its workforce with the correct PPE
- The sub-contractor must be aware that failure to comply with the health and safety policy or instructions may result in removal from site of the subcontractor's personnel.
- Copies of current training, insurance, test and examination certificates for plant and personnel will be required.

#### Agency Workers

- Managers must ensure that agency workers selected to work for the company are competent in the tasks they carry out and receive a site induction.
- Participate in the planning using POWRA, and participating in the company and site HS&E forums
- Wear the correct PPE
- The agency worker must be aware that failure to comply with the health and safety policy or instructions may result in removal from site.
- Copies of signed Terms and conditions, current training, CPCS/CSCS card, test and examination certificates for plant will be required.

#### Visitors & Admin Staff

- Must not be exposed to any risks to their health, safety & welfare by the company's activities.
- Where applicable visitors/Admin Staff on site will be accompanied by a member of staff and attend a visitor's induction.

#### Compliance Dept

- Observe the company health & safety policy and procedures and any specific safety rules whilst on company premises or sites.
- Will work to achieve and surpass the company Quality and Environmental objectives
- Will comply with current and new legislation
- provide audits / inspections and suggestions reporting to management
- provide support and information to all workforce
- will provide HR support services for the business and to all employees



## Arrangements

### Safe Places of Work

- All sites and departments in the organisation will be visited regularly by management and checked at least daily by Project Manager. Project managers will carry out active monitoring of sites; record any health and safety shortcomings, discuss and agree appropriate action with supervisors, report their significant findings to management, and ensure that appropriate actions are implemented within an appropriate timescale. The HS&E manager will provide advice and assistance as required.

### Falls from Height

- Adequate arrangements shall be made to prevent anyone falling wherever there is a likelihood of significant injury, by avoiding the need to work at height. Where this is not reasonably practicable, safe working platforms or personal suspension equipment shall be provided. Failing these options, suitable fall arrest equipment shall be provided (nets, air bags, harnesses & lanyards etc.) to arrest falls should they occur.
- Project Managers shall ensure scaffolding & scaffold towers are inspected by a competent person:
  - before first use
  - weekly
  - after substantial alteration/addition
  - following events likely to affect strength or stability,
  - And the results of the inspections recorded.

### Fragile Material

- Where it is necessary for anyone to work, or pass adjacent to, fragile materials on the firm's premises or one of its construction sites, barriers shall be erected to prevent access or adequate additional support will be provided immediately above or below to prevent anyone falling wherever there is a likelihood of significant injury.

### Falling Objects

- Suitable and sufficient steps shall be taken to ensure objects are not thrown, dropped, pushed over, or kicked from height wherever there is a danger of injury or damage. Guard rails, toe boards, sheeting, netting, or brick guards will be provided where such hazards exist. Where it is not reasonably practicable to provide adequate protection, the potential drop zone shall be adequately zoned off by barrier to prevent access.
- The company will provide any necessary temporary support to new or existing structures which may become unstable and shall control the loading of structures (including scaffolding) to avoid unintentional collapse. All temporary support shall be erected and dismantled under the supervision of a competent person with a permit system in place.

### Demolition / Dismantling

- All work involving the demolition or dismantling of any structure by the firm will be planned to prevent danger to any person and shall be under the supervision of a competent person.

### Excavations

- Adequate steps shall be taken to avoid persons being trapped in any excavation due to collapse of the sides, by the provision of adequate shoring and/or by preventing materials and spoil being stored adjacent to the sides. Project Managers shall ensure excavations are checked by a competent person before the start of each shift, after any accidental fall of rock or earth, and after any event or change in weather

- which could cause instability, with the results of the inspections recorded.
- Adequate barriers shall be provided to prevent falls of materials, persons or vehicles into excavations which would result in injury or significant damage.
- Excavation work shall have a permit system in place and be preceded by a CAT scan and check of utilities plans, where available, to minimise the risk of contact with live services. Hand digging, using shovels and spades only, shall be carried out within 500mm of suspected services to establish their location before further machine work proceeds.
- All excavations which present a significant risk of injury shall be provided with a rigid cover or adequate security fencing whenever a site is left unattended, even when the site is otherwise enclosed at its perimeter.

#### Preventing Drowning

- Where work takes place adjacent to water the company will take all reasonably practicable steps to prevent drowning by providing protective barriers, buoyancy aids and rescue equipment appropriate to the risks involved. Transport of employees by water shall only be on suitably constructed, safely loaded, and properly maintained vessels.

#### Traffic Routes

- The company's premises and all sites will have planned arrangements for the safe movement of all traffic including, where necessary, suitable signs and speed limits. Pedestrians and vehicles will be segregated where reasonably practicable, particularly at entrances and adjacent to welfare accommodation. The need for vehicles to reverse shall be minimised by using a one-way system of traffic control where practical. Reverse parking will apply in car parks unless otherwise indicated.

#### Vehicles

- All vehicles shall be inspected regularly and maintained at least in accordance with the manufacturer's recommendations. The driver of the vehicle is responsible for checking oil, coolant, and tyre pressures. Passengers must not be carried unless purpose-made seating has been installed. Seat belts shall always be worn, where fitted. Operators of dumpers and similar vehicles will dismount during loading to avoid the risk of injury from falling material, unless falling object protection has been fitted. Unattended vehicles shall be immobilised to prevent unauthorised use.
- Loads must be properly secured and sheeted where appropriate.
- Maximum carrying capacity and towing capacity limits of vehicles must be observed.
- The maximum speed for all vehicles is 5 mph in the company's yards and on all construction sites unless otherwise indicated.
- For all crew buses, vehicles towing trailers, and large vans speed limits are 50mph on single carriageways and 60 mph on dual carriageways, except where lower speed limits (e.g. in built-up areas) apply.
- For large goods vehicles, speed limits are 40mph on single carriageways and 50 mph on dual carriageways, except where lower speed limits apply.

#### Manual Handling

- All manual handling operations, where there is a significant risk of injury, shall be avoided as far as is reasonably practicable. Where this is not possible, risk assessments will be carried out by supervisors, Project Managers, and Project Managers, aided, where necessary, by the HS&E manager. On-the-spot risk assessments may also need to be made by Project Managers and individual employees, and all employees exposed to significant risk will undergo training in manual handling and kinetic lifting. Suitable and sufficient aids will be provided to minimise the risk of injury. 140mm (or thicker) dense concrete blocks will not be ordered, or used on Global Infrastructure sites, except with the express consent of the construction manager

## Plant and Equipment

- Competent employees shall make regular checks of all plant and equipment, and any found to be faulty shall be tagged, taken out of use, repaired, and replaced. All plant and equipment shall be stored safely, and periodically thoroughly examined. The results of examinations of larger items shall be recorded. All plant and equipment hired or loaned to the company shall only be accepted if accompanied by adequate inspection and maintenance details.

## Lifting Operations and Lifting Equipment

- All lifting operations shall be planned and supervised by competent persons. Project Managers shall ensure lifting equipment (cranes, hoists, gin wheels, HIABs, MEWPs, forklifts, excavators) is inspected by the operator, or other competent person, weekly and after any event likely to have affected its safe use, and the results of inspections recorded. A thorough examination shall be carried out every 12 months. Foreman / Gangers will be issued with a standard lifting accessories pack, and it will be their responsibility to store appropriately, prevent deterioration and return for testing every six months, this will be flagged up by the Training Department responsible for maintaining a schedule of equipment details and test dates.

## Fire & Emergencies (on company premises & sites)

- Management shall appoint a competent person to carry out risk assessments and develop management systems to deal with fire and other emergencies for the organisation's premises. Suitable and sufficient emergency escape routes have been provided with appropriate signs placed. Regular inspections will be made by the appointed person to ensure these routes remain clear of obstructions. All new employees will be briefed on these and other emergency arrangements during their induction. A specialist firm will continue to inspect regularly and maintain fire-fighting equipment. The fire alarms in the headquarters building, will be tested regularly and practices & instruction held at sufficient intervals to ensure all staff are aware of evacuation procedures. A review of workplace fire safety shall be made annually by the competent person.

## Fire & Emergencies (on construction sites)

- Risk assessments based upon all contract documents and pre-tender information will form the basis of an individual fire and emergencies plan and fire safety rules for each construction site. These shall be included in the health and safety plan. The fire and emergencies plan shall be drawn up by the PC/Client/Project Manager and will incorporate arrangements for escape, provision of fire-fighting equipment, designation of assembly points and the method of alerting everyone to the presence of a fire. The proximity of existing buildings will be considered.
- For all hot works activities in new builds / refurbishment contracts and or civil contracts that have a risk of causing fire due to the proximity of flammable material, a hot works permit is always required.

## First Aid

- The company will assess the first aid requirements of each section of the organisation and ensure enough employees are trained as first aiders and appointed persons, with refresher training provided at least every three years. First aid kits will be provided for each department and site. Project Managers & supervisors will be responsible for ensuring they are maintained. All employees will be informed of the relevant first aid arrangements and the names of first aiders will be prominently displayed on notices.

## Hazardous substances

- Before any employee is required to use any hazardous substance a COSHH assessment will be carried out, and the risks and controls briefed to users. Project Managers will, with the assistance of the health, safety,

and training manager, produce systems of work which reduce the risk of harm to employees from hazardous substances, so far as is reasonably practicable by (in order of preference):

- elimination of the substance altogether
- substitution with a less harmful alternative
- providing physical barriers which limit numbers exposed
- reducing exposure time by, for example, job rotation
- Providing suitable PPE.

#### Asbestos

The organisation is committed to the complete removal of asbestos-containing materials from all its premises. No employee will be permitted to work on any site where there is a foreseeable risk of exposure to asbestos. Before work starts on any existing structures, a thorough inspection must be made by a competent person and written evidence provided that, either no asbestos is present, or any asbestos has been removed, or encapsulated, by a licenced contractor and the structure rendered safe. All employees who might inadvertently expose asbestos when working on existing buildings will be given appropriate training in asbestos awareness recognition and provided with suitable instructions. If any worker presumes or identifies that asbestos may be present in their work area, they will stop work immediately, make the work area safe to ensure no-one is permitted to enter the location and then phone the Project Manager and H&S Manager. The Project Manager or HSE Manager will contact Asbestos specialist to go to site to carry out testing, results of this tests will be analysed before any further work continues in this area.

#### Flammable liquids and liquefied petroleum gas (LPG)

All flammable liquids and LPG shall be stored securely and kept away from combustible materials, except when required for immediate use. All construction sites shall have an area designated for storage and refuelling where the risks of fire or explosion can be controlled.

#### Smoking

- The organisation supports the protection of non-smokers from the discomfort and harm which can be caused by cigarette smoke and recognises the safety risks from naked flames and carelessly discarded smokers' materials. For these reasons smoking is prohibited: -
- in designated refuelling areas on sites,
- in, or near, containers used to store flammable liquids and gas,
- In all rest areas and places where food and drinks are consumed.
- In company vehicles or plant
- Whenever client's rules, permit-to-work systems, or the Project Manager require special restrictions
- On construction sites, Project Managers will designate zones where smoking is permitted.

#### Lighting

- Adequate natural and artificial lighting, including portable lighting on construction sites, will be provided as appropriate to ensure all employees can work safely.
- Welfare facilities
- All employees, including those on construction sites, will be provided, as far as is reasonably practicable, with:
- toilets (separate for each sex, unless self-contained and lockable)
- adjacent washing facilities with, as far as is reasonably practicable, warm running water, particularly on sites where cement and concrete are being used, and bowls large enough for hand and forearm washing.
- a supply of drinking water (from a water fountain, or with cups provided)
- accommodation for clothing and work clothes drying facilities
- a rest room or rest area

- facilities to ensure meals can be prepared and eaten
- Means to boil water for hot drinks and facilities to heat food.
- While everyone has a duty to keep welfare facilities in a clean and tidy state as far as possible, the Project Manager will appoint a person or persons to clean facilities at least daily.

#### Temperature and weather protection

- All employees working indoors on Global Infrastructure premises, site offices and canteens will be provided with sufficient heating to ensure a reasonable working temperature. Employees exposed to adverse weather conditions will be supplied with suitable protective clothing.

#### Display screen equipment

- The HS&E will assist managers in identifying employees who regularly use computers as a significant part of their work enable assessment of workstation risks. Assessment checklists, results of tests and recommendations made for reducing risks shall be kept by the health and safety adviser. Following assessment, management will authorise all reasonable steps to control risks to the health of users. Display screen equipment users may request an eyesight test at the company's expense. The company will only provide standard glasses and lenses when required solely for using display screen equipment at work.

#### Housekeeping

- Suitable containers will be provided for segregation and disposal of waste and, on construction sites employees will be assigned by Project Managers or supervisors to ensure waste is transferred regularly to appropriate skips. Rubbish must not be burnt.
- Regular checks will be made by department supervisors and Project Managers to ensure work areas are kept tidy and free of slip and trip hazards.

#### Personal protective equipment (PPE)

- The company will provide, without charge, all necessary PPE to employees whose activities expose them to a particular risk which cannot be controlled adequately by other means.
- Project Managers and supervisors will be responsible for ensuring no-one enters a Global Infrastructure site without suitable head protection, safety footwear a high-visibility vest or jacket, gloves, and eye protection. Supervisors will issue additional personal protection equipment as appropriate, which will be kept in site offices and will include: -
  - ear defenders ( earmuffs or disposable plugs)
  - Goggles/visor (high impact and/or chemical resistant).
  - standard gloves (ribbed rubber palms and fingers with fabric back)
  - Waterproof gauntlets (for use in polluted water etc.)
  - full-body harnesses and lanyards (for use whenever a safe working platform cannot be provided and where there is a significant risk of injury through falling)
  - disposable dust masks
  - special respiratory protection (assessed and face-fit tested for individual employees)
  - waterproof jackets & over trousers
  - disposable boiler suits
  - safety wellingtons

#### All employees must:

- Wear PPE. When required and particularly for activities with special risks
- Safeguard their PPE. from unnecessary damage, using protective storage pouches and bags and lockers were provided
- Report any loss or defects immediately

## Accidents, Injuries and Dangerous Occurrences

- It is the responsibility of everyone in the company to report all accidents and incidents promptly in accordance with company procedure.
- Accident books are kept in the main office and all site offices, and details of every accident, no matter how minor, must be entered by the injured person where practicable.
- This is required for two main reasons:-
- Only by finding out the causes of these minor incidents and near misses can similar, more serious events be avoided.
- Certain accidents and dangerous occurrences must, by law, be reported to the Health and Safety Executive (HSE).
- The HS&E manager will ensure that an appropriate level of investigation is carried out of all significant incidents, and will ensure that reports are submitted where required, to the HSE.

## Information, Instruction and Training

- All new employees will receive induction training on site delivered by their line manager supervisor or Project Manager. All those starting work on, or visiting for the first time any, Global Infrastructure sites will be given a site induction by the Project Manager. No employee shall be required to carry out any task, or use any equipment, where training or technical knowledge is necessary, unless he/she has received adequate information, instruction and training, except where under the direct supervision of a competent person.
- The HS&E Manager, in conjunction with Project Managers, will assist with individual training appraisals where necessary to assess:-
- what training and instruction has been given
- how appropriate and effective this training has been
- What further training is required
- Originals, where possible, of all certificates and other training information will be kept in the Beauville office.
- Each year certain company-wide health & safety issues will be selected, and training & instruction will be given on these topics to all affected personnel.

## Competence

- A competence matrix will ensure that the following basic levels of competence are achieved:
- CSCS card: for all construction site personnel
- CPCS card or equivalent: for construction plant operators
- SMSTS certificate: for Project Managers
- First Aider: at least one certificate holder per site
- All the above certificates will be subject to a renewal process to ensure they remain current.
- In addition, any site or client specific requirements will be checked.
- All vehicle drivers must ensure they have a valid current driving licence for the categories of vehicle which they are expected to drive. Driving Licences must be made available for checking on a regular basis and drivers must notify any restrictions on their licence immediately.

## Communication

- Any information which could affect an employee's health and safety will be communicated in one of the following ways, whichever is most appropriate:-
- direct mailing to each employee
- verbal instructions and hand-outs at training/briefing sessions
- inductions, where the information forms part of a health and safety plan or method statement
- toolbox talks
- individual interviews (e.g. reviews of training needs, new employee inductions)

- Opportunities will be provided at all instruction, briefing and interview sessions for employees to ask questions, give feedback and express any health and safety concerns they may have. Day-to-day queries may be made to supervisors who, in turn will seek further clarification from management if required. Alternatively, any employee can contact the company H&S manager Alan Niven on 01463 870904.
- Safety Forums will be held on a regular basis to promote employee involvement.

#### Employee Responsibilities

All employees are required to:-

- Perform their duties in a safe manner which does not place themselves or others at risk
- Co-operate with the company in matters of health and safety, making full use of any plant, equipment or system of work provided for reducing risks to themselves and others.
- Safeguard and not misuse anything provided for their own or others' health and safety.
- Report any safety concerns and challenge any apparent unsafe practices.

#### Sub-Contractors

- Global Infrastructure shall maintain a list of approved sub-contractors and, initially, each will be required to return a questionnaire, with supporting documents, to demonstrate they are competent and have adequate resources to carry out their work safely and without risk to health. Their competence will be assessed in conjunction with advice from by the H&S manager, and Compliance Department, who will make appropriate recommendations to the director responsible for health and safety. After their satisfactory assessment, and when appointed to carry out works for a particular contract, they must provide adequate risk assessments and method statements before they or their employees can start work on site.

#### Company rules

- Personal protective equipment must be worn when required. Hard hats, safety footwear and high-visibility vests/jackets must always be worn on all Global Infrastructure sites. Eye protection and gloves are also required,
- All accidents, injuries and near misses must be reported immediately.
- No excavation shall be started unless at least a CAT scan has been carried out.
- Scaffolding must not be erected, altered, or dismantled except by scaffolders under the instructions of the Project Manager.
- Ladders must be tied securely on both stiles, or footed, before use, and must extend at least 1m (5 rungs) above landings, unless adequate handholds are available.
- Plant and equipment must only be operated by competent and authorised employees.
- Any defective equipment should be reported immediately to the supervisor, tagged, and taken out of use.
- All lifting operations shall be planned and shall be supervised by a competent person with the authority to stop further operations if there is an immediate risk of injury or damage.
- Fire and escape routes must be always kept clear.
- No dangerous substances, or substances marked 'very toxic,' 'toxic,' harmful,' 'corrosive' or 'irritant' is to be used unless a COSHH assessment has been provided, read and understood by the user.
- All waste material should be collected as work proceeds and working areas tidied at the end of each day.
- Mobile phones and radios are not permitted in the workplace. These must be left in the canteen or in vehicles during working hours. Exceptionally, a Project Manager may specifically instruct lone workers and small teams to keep mobile phones with them, for business use only, while working.
- The last person to leave any section of company or site premises shall be responsible for ensuring entrances are locked and alarms activated, where appropriate. Before sites are left unattended:
- excavations shall be boarded over or secured with barriers

- plant and equipment shall be immobilised
- harmful substances locked away
- Any means of access to scaffolds shall be removed or secured against unauthorised use.
- for roadworks sites, record photos shall be taken on departure from site
- Horseplay or running on company premises is prohibited.
- The consumption of, or reporting for work under the influence of, drink or drugs is a direct breach of the conditions of employment and can result in instant dismissal.



### **3. Corporate Social Responsibility Policy**

As indicated in our Vision and Values, we recognise that we must integrate our business values and operations to meet the expectations of our stakeholders and interested parties who include our employees, customers, investors, suppliers, the community, and the environment.

We recognise that our social, economic, and environmental responsibilities to these 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 stakeholders and, where possible, maintain open dialogue to ensure that we fulfil the requirements outlined within this policy.

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

Global Infrastructure Directors are responsible for the implementation of this policy and will make the necessary resources available to realise our corporate responsibilities. The responsibility for our performance on this policy rests with all employees throughout the company.

Practices which Global Infrastructure adopt and believe in include:

- Ethics and human rights
- Equality & Diversity
- Biodiversity & Ecology
- Sustainability Management

Practices which Global Infrastructure consider to be unethical or dishonest include:

- Clandestine brokering or sharing of tender information
- Collusion for the purpose of corrupting a competitive tender
- Payments, gifts or entertainment to Global Infrastructure employees, agents, or representatives to influence decision making
- Modern Slavery and child labour
- Forced, bonded or involuntary prison labour
- Use of Counterfeit, Fraudulent and Suspect Items (CFSI)
- Fraud, Corruption & Bribery
- Deception
- Discrimination, Harassment, Racial comments or Bullying in the workplace

Our partnership focus shall:

- Ensure a high level of business performance while minimising and effectively managing risk ensuring that we uphold the values of honesty, partnership and fairness in our relationships with all our stakeholders.
- Support the development of our external stakeholders through led training courses and using our facilities for all clients to hold industry meetings as required.
- Ensure our contracts will clearly set out the agreed terms, conditions and the basis of our relationship and will operate in a way that safeguards against unfair business practices
- Encourage suppliers and contractors to adopt responsible business policies and practice.
- Encourage dialogue with local communities for mutual benefit.
- Register and resolve customer complaints in accordance with our standards of service.
- Support and encourage our employees to help local community organisations and activities in our region, particularly our employee chosen charities.
- Work with local schools, colleges and universities to assist young people in choosing their future careers, being an advocate for our industry.

- Operate an equal opportunities policy for all present and potential future employees and will offer our employees clear and fair terms of employment and provide resources to enable their continual development.
- Maintain a clear and fair employee remuneration policy and shall maintain forums for employee consultation and business involvement.
- Provide safeguards to ensure that all employees at whatever nationality, colour, race, or religious belief are treated with respect and without sexual, physical, or mental harassment.
- Provide, and strive to maintain, a clean, healthy, and safe working environment in line with our Health and Safety policy and safe systems of work.
- Encourage active use of our Environmental policies and objectives.

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#### **4. Ethical Trading and Human Rights Policy**

Employment is freely chosen

- There is no forced, bonded, or involuntary prison labour.
- Employees are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after contractual notice.

Freedom of association and the right to collective bargaining are respected

- Employees, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
- Employees' representatives are not discriminated against and have access to carry out their representative functions in the workplace.

Working conditions are safe and hygienic

- A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, as far as is reasonably practicable, the causes of hazards inherent in the working environment.  
Employees shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned employees.
- Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- Accommodation, where provided, shall be clean, safe, and meet the basic needs of the employees.
- The company observing the code shall assign responsibility for health and safety to a senior management representative.

Child labour shall NOT be used

- There shall be no new recruitment of child labour.
- Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- These policies and procedures shall conform to the provisions of the relevant UK standards.

Living wages are paid

- Wages and benefits paid for a standard working week meet, at a minimum, national legal standards, or industry benchmark standards, whichever is higher. In any event wages should
- always be more than enough to meet basic needs and to provide discretionary income.
- All employees shall be provided with written and understandable Information about their employment conditions in respect to wages and benefits before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- Deductions from wages as a disciplinary measure shall not be permitted, nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the employee concerned.

Working hours are not excessive

- Working hours must comply with national laws, collective agreements, and the provisions in all the

sections below, whichever affords the greater protection for employees. Clauses are based on UK statutory provisions.

- Working hours, excluding overtime, shall be defined by contract, and shall not normally exceed 48 hours per week unless the employee has contractually opted out of this provision.
- All overtime shall be voluntary. Overtime shall be used responsibly, considering all the following: the extent, frequency and hours worked by individual employees and the workforce. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate.
- The Company meets all the provisions of the Working Time Regulations 1998.
- Employees shall normally be provided with at least one day off in every seven-day period or two days off in every 14-day period.

Regular employment is provided

- To every extent work performed must be based on recognised employment relationship established through national law and practice.
- Obligations to employees under employment or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of zero hours contracts or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

No harsh or inhumane treatment is allowed

- Physical abuse or discipline, the threat of physical abuse, sexual, racial, or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

The use of this code constitutes minimum and not maximum standards, and this code is not used to prevent Global Infrastructure from exceeding these standards. Global Infrastructure applies this code to comply with national and other applicable laws and, where the provisions of law and the Ethical Trading

Initiative base code address the same subject, to apply that provision which affords the greater protection.

## **5. Anti Slavery Policy**

Global Infrastructure with a turnover of less than £36m, pursuant to section 54(1) 'Transparency in Supply chains' does not have a legal obligation to provide a slavery and human trafficking statement for each financial year. However, to be transparent about how our business operates, this statement clarifies our position.

- Slavery, servitude and forced or compulsory labour' and 'human trafficking' is abhorrent and within Global Infrastructure, or any of its supply chain, this will not be tolerated. Only suppliers who have met the criteria within our supplier/sub-contractor questionnaire are added to our approved list. We provide transparency within our supply chain by carrying out regular audits of our approved supply chain requesting evidence to show their maintenance of the Modern Slavery Act 2015.
- Should you suspect or identify the signs of slavery, forced or compulsory labour and or human trafficking this must be reported to the Modern Slavery Helpline on 0800 0121 700 where information and guidance on what to do next can be obtained.

This statement sets out the Company's actions to understand all potential modern slavery risks related to our business and to put in place steps aimed at ensuring that there is no slavery or human trafficking in our business and its suppliers/sub-contractors.

### Countries of operation and supply chain

The Company operates in the United Kingdom and does not undertake work in any other countries. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere within its business or the business of its suppliers/sub-contractors.

### Supplier/sub-contractor adherence to our values

We have a zero-tolerance policy to slavery and human trafficking, enforced/bonded labour. We communicate this and expect all those in our supply chain and contractors to comply with our values. All suppliers and sub-contractors are required to complete a questionnaire to ensure that they meet our standards/requirements e.g. Health & Safety. Equal Opportunities and are free from modern slavery and or human trafficking etc.

### Risk Mitigation

Recruitment of temporary labour and paying the agency not the employee is potentially open to this risk. The current migrant crisis is of concern, as we know that the undocumented immigrants are entering the country and without access to means to support themselves, they may fall foul of gang lords who offer cheap unskilled labour. Company policy is to recruit and pay staff directly; only reputable agencies with due diligence carried out shall be added to our Approved List.

This Statement will be provided to any interested parties, Clients, and other stakeholders, upon request and will be reviewed annually by the Director in association with designated personnel.

## **6. Anti Bribery, Corruption and Fraud Policy**

Global Infrastructure have a zero-tolerance policy approach to equacorruption and fraud.

The purpose of this policy is to:

- a) Set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption  
and
- b) Provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

It is fundamental to the operations of the business that our personnel, supply chain, third parties, interested parties, clients and all business relationships shall mirror this policy and commit to the following principles:

- We will carry out our business fairly, honestly and with integrity
- We have a zero tolerance towards bribery, corruption, and fraud
- There will be severe consequences for any breach of this policy by any personnel
- We will avoid doing business with any others who do not commit to anti bribery objectives
- We will promote the business benefits of rejecting bribery, which will enhance our reputation to both customers and business partners
- We will produce, if necessary, procedures for the implementation of both this policy and protection of confidential reporting of bribery
- Key individuals concerned with this policy's implementation within the organisation, will be named.
- We will uphold all UK laws relevant to countering bribery and corruption in all the jurisdictions in which we operate
- We shall remain bound by the laws of the UK, including the Bribery Act 2010.

### Understanding this Policy

In this policy, third party means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, government and public bodies, including their advisors, representatives and officials, politicians and political parties.

### Who is covered by the policy?

This policy applies to all individuals working at all levels, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or their employees, wherever located (collectively referred to as workers in this policy).

## What is bribery?

A bribe is an inducement or reward offered, promised, or provided in order to gain any commercial, contractual, regulatory or personal advantage.

## Gifts and hospitality

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties. The giving or receipt of gifts is not prohibited, if the following requirements are met:

- a) It is not made with the intention of influencing a third party to obtain;
- b) Retain business or a business advantage, or to reward the provision;
- c) Retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- d) It complies with local law;
- e) It is given in our name, not in your name;
- f) It does not include cash or a cash equivalent (such as gift certificates or vouchers);
- g) It is appropriate in the circumstances. For example, in the UK it is customary for small gifts to be given at Christmas time;
- h) Considering the reason for the gift, it is of an appropriate type and value and given at an appropriate time;
- i) It is given openly, not secretly; and
- j) Gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of the Managing Director.

We appreciate that the practice of giving business gifts varies between countries and regions and what normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

## What is not acceptable?

It is not acceptable for you (or someone on your behalf) to:

- a) Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- b) Give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to “facilitate” or expedite a routine procedure;
- c) Accept payment from a third party that you know, or suspect is offered with the expectation that it will obtain a business advantage for them;
- d) Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- e) Threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- f) Engage in any activity that might lead to a breach of this policy.

## Facilitation payments and kickbacks

We do not make, and will not accept, facilitation payments or “kickbacks” of any kind.

If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns, or queries regarding a payment, you should raise these with your line Manager/Director. Kickbacks are typically

payments made in return for a business favour or advantage. All workers must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

#### Donations

Global Infrastructure do not make contributions to political parties. We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the Managing Director.

#### Your responsibilities

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

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify the Managing Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage with us or indicates to you that a gift or payment is required to secure their business.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

#### Record-keeping

We shall keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties should such payments arise. You must declare and keep a written record of all hospitality, or gifts accepted or offered, which will be subject to managerial review.

You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers, and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

#### How to raise a concern

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with your line Manager/Director.

#### What to do if you are a victim of bribery or corruption

It is important that you tell your line Manager/Director as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.



## Protection

Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no-one suffers any detrimental treatment because of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

## Training and communication

Training on this policy forms part of the induction process for all new workers. All existing workers will receive regular, relevant training on how to implement and adhere to this policy. Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and as appropriate thereafter. Who is responsible for the policy? The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. Management at all levels are responsible for ensuring those reporting to them is made aware of and understand this policy and are given adequate and regular training on it.

## **7. Equality & Diversity Policy**

Global Infrastructure is an equal opportunities employer. It is important to us that our employees feel valued and are always treated with respect. At Global Infrastructure we foster a fair, inclusive, supportive environment for all employees to promote the prevention of harassment, discrimination and victimisation in the workplace. To this end we are committed to the Equality Act 2010, the Disability Discrimination Act 1995, relevant codes of practice and total non-discrimination in terms of:

- race or colour
- nationality or ethnic origins
- sexual orientation or marital status
- gender identity
- age
- disability
- pregnancy
- maternity/paternity

Accordingly, Global Infrastructure shall make reasonable adjustments for physically or mentally impaired workers who have a long term condition that has a substantial and long-term negative effect on their ability to carry out normal daily activities providing the same access to everything that is involved in doing and keeping a job as a non-disabled person, as far as is reasonably possible.

Management will ensure that recruitment, selection, training, development and promotion procedures result in no job applicant or employee receiving less favourable treatment on the grounds of race, colour, nationality, ethnic or national origin, religion or beliefs, age, disability, trade union membership or non-membership, gender identity, sexual orientation or marital status, or being a part-time worker. The Company's objective is to ensure that individuals are selected, promoted, and otherwise treated with respect, solely on the basis of their relevant aptitudes, skills and abilities.

If, at any time, employees feel they have been treated less favourably than others in relation to equal opportunities without reasonable justification, they should raise the matter with their manager.

In the event that you have been the subject of discrimination by another employee, client, customer or visitor in terms of physical or verbal abuse or harassment, you should inform your Manager, or a Director of the Company, immediately and or follow the Confidential Reporting Policy as at section 5 of this policies manual.

## **8. Sustainability & Biodiversity Policy**

Global Infrastructure believe in procuring sustainably. We build economic, social, and environmental considerations into our procurement of goods, services, and works encouraging innovation where feasible to achieve the most cost effective and sustainable services and products for our client. The social and economic impacts of the product or service are considered throughout their lifetime.

Through robust supply chain management, our suppliers are expected to consider the social and economic impacts of their product or service and mirror our policy of sustainable procurement

Sustainability is broken down into four main areas:

- Environment
- community
- employees
- supply chain

These issues form the framework for managing the aspects of our business that have impacts environmentally and socially and enable us to engage meaningfully with our stakeholders.

Annually we review and prepare a Carbon Analysis Review underpinned by sustainability goals set by the business. The setting of goals objectives and KPIs within this, along with our operational controls and procedures, enables us to effectively manage these impacts.

Sustainability is driven from the very top in our business and embedded throughout every department and engaging our whole workforce. Strong leadership and governance therefore underpin and supports our sustainability endeavours and ensures we are compliant with all environmental legislative and other requirements.

### **Environment**

We are committed to reducing and managing carbon pollution on and off site with a net zero aim over the next decade. Introducing PHEVs and electric vehicles to the business fleet and by hiring the most up to date plant with lowest emissions from our trusted suppliers enables us to demonstrate our commitment to sustainability.

Our operating systems provide us with an excellent framework for managing and monitoring our carbon output. ISO 14001 (Environmental) forms part of our Integrated Management System that also includes 45001 (Health & Safety) and ISO 9001 (Quality).

### **Local Community**

We have formed many close relationships with the local community and maintained these through our community investments and sponsorship programme. Supporting community from local football team sponsorship and provision of materials for playgroups, to volunteering for local charities and engaging with young people at schools, colleges and careers events.

### **Engaging our employees**

Communication is an important component of our operations. We use our regular leadership meetings, HSEQ Meetings, forums, briefings, newsletters, e-mails, and social media posts to connect with our workforce and others. Encouraging workforce participation, we have an open-door policy, and we will continue to encourage our workforce support in this regard.

### **Suppliers/Sub-Contractors**

We manage all our supply chain with the expectation they have their own sustainability policy. Should this not be the case they are required to commit to our Company Sustainability policy prior to approval.

## Biodiversity – how we can all help?

Global Infrastructure recognises and values the need for a biodiversity policy to help mitigate the major loss of biodiversity and ecosystems, particularly when undertaking operational activities across the business. As far as is reasonably practicable, and in alignment with client expectation, Global Infrastructure shall adhere to the following:

Minimise the impact on habitats and biodiversity from activities and operations which could potentially cause harm and prevent pollution following these simple steps:

- Seek to create, maintain, and enhance habitats to encourage both plants and animals, where possible.
- Minimise the impact on biodiversity from operations and, where possible, install nature-based solutions and seek a net increase in ecological value through project design and delivery.
- Ensure ecological surveys are completed prior to, and post completion of operations, and the results are documented.
- Work with clients/stakeholders to improve habitat and biodiversity management practices.
- Seek opportunities to cultivate an awareness of and connection with nature on site and within the local community
- Provide training for personnel to ensure contractors can meet the requirements of the Biodiversity and Sustainability Policies.
- Ensure all contractors are provided with knowledge of the biodiversity policy and the mitigation measures/constraints on site

### Monitoring And Reporting

- Implement mechanisms for monitoring habitats and biodiversity wherever possible.
- Seek to identify, monitor, and protect any protected species and national conservation list species with habitats in areas affected by GI operations.

### Communication, Education, Research & Stakeholder Engagement

- Raise awareness about the climate and ecological crisis and what measures can take to help mitigate the major loss of biodiversity and ecosystems.
- Encourage workforce to connect with nature
- Educate to further the understanding of both our place in nature, our reliance on its health, and how we can enhance it.

## 9. Waste Management Policy

It is the policy of Global Infrastructure to eliminate harm and reduce business risk by proactively managing our business systems and procedures. Global Infrastructure in their aim towards net zero shall:

- Prevent, reduce, reuse, recycle, recover and will send to landfill only when there is no other option.
- adopt the principles of the 'best practicable environmental option' in the delivery of its waste management services.
- apply a 'circular economy waste hierarchical approach,' to prevent, reduce, reuse, recycle and recover waste products.
- account for waste monthly within the business using their carbon management tool.
- provide an annual Carbon Review to include waste and the carbon it represents.

There is a legal requirement for all who produce, keep, or dispose of waste of any type to comply with the various regulations and the Duty of Care under Environmental Protection legislation. Global Infrastructure recognises the importance of meeting these legal requirements and to manage its waste responsibly, reduce dramatically the volume of waste sent to landfill and maximise reuse and recycling.

Global Infrastructure requires all staff, contractors, and anyone else making use of the premises to comply with this Policy to ensure compliance with all waste legislation.

In accordance with the Policy Statement Global Infrastructure will fulfil the following Policy Objectives:

- To ensure that waste is managed in accordance with all waste legislative requirements, including the duty of care, and to plan for future legislative changes and to mitigate their effects.
- To minimise waste generation at source and facilitate prevention, reduction, reuse, recycling and recovery options over the disposal of wastes, where it is cost effective.
- To provide clearly defined roles and responsibilities to identify and co-ordinate each activity within the waste management chain.
- To promote environmental awareness to increase and encourage waste minimisation, reuse, and recycling.
- To secure where possible, revenue for recyclable material to reinvest into the expansion of recycling opportunities on the site
- To ensure the safe handling and storage of wastes on site
- To provide appropriate training for staff, and other stakeholders on waste management issues
- To promote industry waste management "best practice"
- To appoint competent person(s) to provide waste management advice.

### Application

This policy applies to all activities undertaken by (or on behalf of) Global Infrastructure including those of its staff, contractors, suppliers, visitors.

### Organisation and Management

The responsibilities and organisational arrangements for this Waste Management Policy lie with the Managing Director of Global Infrastructure.

### Project Manager/Site Manager

Responsible for:

- Coordinating the provision of a central waste and recycling contract service for use by all facilities on the site.
- Ensuring that EWC, SIC codes and all waste values are notified on the waste transfer notification before signing on behalf of Global Infrastructure.

- Ensuring that all contractors are advised that they must comply with the Duty of Care; that they must comply with Global Infrastructure's Waste Management Policy; or satisfy Global Infrastructure that their own procedures will achieve legal compliance.
- Ensuring that all contractors appointed to carry out works are from Global Infrastructures 'Approved List'.

#### ECOW/Environmental Manager/H&S Manager

##### Responsible for:

- Provision of advice and guidance to Global Infrastructure on waste management.
- Setting Environmental Performance Indicators for waste management.
- Reporting annually on progress against the Environmental Performance Indicators.
- Monitoring and auditing the management systems for all wastes, to ensure legal compliance.
- Monitoring and auditing all waste contractors working for Global Infrastructure.
- Provision of appropriate training for all personnel who have responsibilities for waste management.
- Registering with appropriate enforcement agencies as a waste producer.
- Coordinating the gathering of, and supplying all relevant information to appropriate enforcement agencies, when information relating to waste management is requested.
- Investigation of any incidents or accidents relating to waste management
- Compiling waste data and statistics to enable annual benchmarking against established Environmental Performance Indicators.

#### Site Supervisor

##### Responsible for:

- Overseeing the day-to-day delivery of general waste and recycling services.
- Monitoring the performance of the contractor against Service Level Agreements.
- Liaising with the HSEQ Managers to establish procedures for managing waste
- Operational monitoring of waste management systems across the site.
- Compiling and holding in the office Waste Transfer Notes
- Non-Special/Hazardous Wastes (central waste and recycling contract); ensuring that no Special/Hazardous Waste is disposed of through the general or waste recycling streams. (N.B. There is no requirement to sign any Waste Transfer documentation or keep records for centrally managed waste and recycling services).
- Special/Hazardous Wastes; nominating a 'responsible person' within their School/Directorate to coordinate waste disposal for any hazardous or clinical wastes.
- Informing the Health, Safety and Environment Office of the nominated Staff / Contractors & Suppliers
- Disposing of waste responsibly, through the appropriate waste stream, in accordance with Global Infrastructure's policies and procedures.
- Reporting any problems with waste collection schemes to Global Infrastructure

## Glossary of Terms

### **Best Practicable Environmental Option (BPEO)**

The Best Practicable Environmental Option refers to the analysis of different methods of waste disposal. The preferred option is the one which minimises harm to the environment, considering what is affordable and practicable.

### **Clinical Waste**

#### **Any waste which consists wholly or partly of:**

- Human or animal tissue; blood or other body fluids; excretions;
- drugs or other pharmaceutical products other than controlled or cytotoxic drugs swabs or dressings;
- Syringes, needles, or other sharp instruments which unless rendered safe may prove hazardous to any person coming into contact with it. It also includes any other waste arising from medical, nursing,

dental, veterinary, pharmaceutical, or similar practice, investigation, treatment, care, teaching or research, or the collection of blood for transfusion, being waste which may cause infection to any person coming into contact with it.

- Environmental Protection Act 1990 (EPA 1990)
- This is the single most important piece of environmental legislation, and it controls many aspects of how the environment is protected and regulated. The EPA 1990 provides the main statutory framework in relation to waste.
- Most of the waste leaving Global Infrastructure is controlled waste. This is described in the EPA 1990 as the waste arising from household, commercial or industrial premises. Controlled waste includes waste from offices, food handling, shops, and other domestic activities.

**EPA 1990 Section 34 imposes a "Duty of Care" on producers and handlers of waste, "to take reasonable measures to prevent the unauthorised deposit, treatment or disposal of waste."**

**This means the following:**

- Global Infrastructure must keep records of how much waste it is generating.
- Global Infrastructure must ensure that a registered carrier collects their waste.
- Global Infrastructure must ensure that all transfer notes are completed and filed detailing the type of waste for disposal. Special/Hazardous Waste Notes must be kept for 3 years, waste transfer for 2 years.
- Ensure that all waste is dealt with in accordance with the "Duty of Care".
- Breach of the Duty of Care is a criminal offence and can incur penalties of up to £20,000 or an unlimited fine if convicted on indictment.

**Special/Hazardous Waste**

Referred to as Hazardous Waste in England and Special Waste in Scotland, these are the most dangerous wastes as they can cause the greatest environmental damage or are dangerous to human health. Some common Special/Hazardous Wastes are listed below:

<b>Asbestos</b>	<b>Asbestos containing materials must be handled by a specialist contractor only</b>
<b>Waste oils / lubricants/ Oil Contaminated material</b>	<b>Spills or leaks of oil-based substances can contaminate soil, waterways and groundwater leading to ecological damage health hazards</b>
<b>Contaminated Soils</b>	<b>Hazardous substances such as heavy metals, fuel hydrocarbons, pesticides or industrial chemicals will require remediation to ensure safe land use</b>
<b>Industrial Waste - Heavy Metals/cyanides/ammonia</b>	<b>May require specialist treatment or disposal methods to minimise the impact on the environment</b>
<b>Chemical Waste / COSHH</b>	<b>COSHH substances no longer needed or regarded as waste may need to follow special waste</b>
<b>Weee Waste – TV/Computers/Appliances</b>	<b>Lead, cadmium, mercury and brominated flame retardants must be recycled and disposed of following WEEE regulations to prevent environmental pollution and human exposure</b>
<b>Demolition &amp; Construction wastes</b>	<b>Asbestos, lead based paints, treated timber and chemical residues may be recovered during these activities. Must be managed correctly to protect workers from potential hazards and the environment</b>
<b>Clinical Waste</b>	<b>Sharps, pharmaceuticals and radioactive waste may be recovered during construction works. These must be segregated handled and disposed of following strict protocol to prevent the spread of infection and protect public health and follow separate legislation</b>

## How to comply

### Producer Registration

- All industrial and commercial premises producing more than 500kg of Special/Hazardous Waste must notify their existence to SEPA.  
Additionally:
- No Special/Hazardous Waste can be collected from any unregistered site
- Waste producers who do not register their premises will be committing an offence
- Waste contractors who move waste from a non-registered site will be committing an offence
- Waste producers will need to provide proof to waste contractors (via a unique code number) that they are registered
- Registrations must be renewed annually

### Movement of Special/Hazardous Waste

Under the Regulations, the movement of wastes is controlled by a documentation system which must be completed whenever waste is removed from premises. From the waste producer's perspective, the most important form is the Consignment Note. This must be completed before waste can be removed and detailed information must be provided including:

- a description of the Waste detailing:
- the process giving rise to the waste,
- the quantity,
- the chemical (and/or biological) components and their concentrations,
- the waste code,
- and the container type, size, and number.
- identify where the waste is going and
- give the Consignment Note a unique Code number.

Lastly you must keep a copy of the consignment notes and the quarterly return in a register for a minimum of 3 years and make them available to SEPA on request.

### Recycling is -

The diversion of waste away from landfill or incineration and the reprocessing of those wastes either into the same product or a different one. This includes non- Special/Hazardous Wastes such as paper, glass, and cardboard, plastic, and scrap metal.

### Responsible Person is -

The person who oversees the wastes to be removed from the premises at which it was produced or is being held.

### Waste is-

The legal definition of waste comes from Section 75(2) of the Environmental Protection Act 1990 (EPA 1990). It defines waste as any substance or object which the holder discards, intends to discard, or is required to discard.

The EPA 1990 refers to 'controlled wastes' which are split into four categories: Household, commercial, industrial, and clinical waste. Global Infrastructure produce waste in all four categories. There are some wastes which are exempted as they have their own separate legislation e.g. radioactive wastes.



## Waste Hierarchy

Unlike the traditional linear method of buy, make, dispose, Global Infrastructure follow a circular economy framework fostering resilience, sustainability and regeneration through the maximisation of resources and the minimisation of waste, pollution and environmental impact.

The waste hierarchy below lists the different ways of dealing with waste in order of preference.



**1 PREVENT** - The most preferred option. Reduce the waste through product design improvements, collaboration, innovation, process optimisation or alternatives materials.

**2 RE-USE** – through refurb, repair etc consider reusing the waste/item, extend the lifespan, eliminate the use of resources in making new items.

**3 RECYCLE** – Collect, sort and process waste into separate receptacles, conserving resources to make new products or raw materials, decreasing waste sent to landfill.

**4 RECOVER** – collection of waste to energy incineration recovered to generate energy or material recovery through anaerobic digestion or composting.

**5 DISPOSE** – to landfill. This should be considered **only** when Prevention, Re-use, Recycling and Recovery are not feasible.

**Burning and dumping of waste is illegal!**

## **10. Business Continuity Policy**

Global Infrastructure is committed to implementing effective business continuity measures to ensure the resilience and continuity of our operations, protect the interests of our stakeholders, and maintain the trust and confidence of our customers. We recognise that proactive planning, preparedness, and response are essential for minimising the impact of disruptive incidents and ensuring the timely recovery of critical business functions

In pursuit of this policy, Global Infrastructure shall:

- develop a business continuity plan (BCP) which examines risk, threats, and critical business functions assessing response, recovery time and the efforts required during disruptive incidents. The BCP outlines roles, responsibilities, process, and resources necessary for mitigating risk and restoring essential business functions.
- establish clear lines of Communication and co-ordination to effect the plan, which may affect internal and external stakeholders including employees, customers and suppliers. To ensure that the BCP operates smoothly,
- create a business continuity team who are responsible for developing, maintaining and updating the BCP, co-ordinating response and recovery efforts during emergency situations and for conducting training, drills or simulations.
- provide suitable training and awareness to all necessary employees to understand their roles and responsibilities during emergencies.
- conduct drills/simulations to test preparedness, and the effectiveness of our BCP. Following drills/simulations carried out we shall review and update our BCP where necessary taking into account changing threats and lessons learned from past experiences to ensure continuous improvement.

Everyone within the organisation has a responsibility for familiarising themselves with this policy and with the Business Continuity Plan in relation to their roles and responsibilities during an emergency situation and are required to co-operate fully in the implementation of this policy, and all measures contained in the Global Infrastructure BCP.

## **11. Risk Reduction Policy**

Global Infrastructure is committed to proactively identifying, assessing, and managing risks to prevent incidents, injuries, damage, and losses. We recognize that effective risk reduction is essential for safeguarding the health, safety, and well-being of our employees, protecting the environment, maintaining operational continuity, and ensuring the trust and confidence of our customers and stakeholders. This policy outlines our approach to managing risks effectively and continuously improving our risk management processes.

This document does not replace the Company's Business Continuity Plan but will be executed alongside it. This document will also be supplemented by the latest guidance as supplied by regulatory bodies.

During unprecedented times such as the COVID-19 Pandemic, we all have a duty of care and a responsibility to act in the best interests of those closest to us this includes family, friends, colleagues, employees, and the wider community.

To protect the health and well-being of the population we must follow Government guidelines set out for this purpose.

It is the Policy of Global Infrastructure to ensure we provide adequate, carefully considered information in line with Scottish Government Guidelines, to protect the health, welfare, and well-being of our employees during unprecedented times.

In pursuit of this policy Global Infrastructure shall ...

1. Continually Assess and Review Exposure
2. Keep Communication Flowing
3. Provide Flexible Working Information
4. Deliver Updated Hygiene Advice & Symptoms
5. Advise on Self Isolation
6. Provide Official Government Guidelines
7. Supply Health & Mental Well-being Advice
8. Liaise with our Supply Chain
9. Distribute Useful Information

Global Infrastructure is committed to proactively identifying, assessing, and managing risks to prevent incidents, injuries, damage, and losses. We recognize that effective risk reduction is essential for safeguarding the health, safety, and well-being of our employees, protecting the environment, maintaining operational continuity, and ensuring the trust and confidence of our customers and stakeholders.

All stakeholders including employees, contractors, suppliers, consultants and agency personnel involved in Global Infrastructure operations and activities are required to co-operate fully in the implementation of this policy, and all risk reduction measures put in place by the organisation. It encompasses all aspects of risk management, including but not limited to health and safety risks, environmental risks, operational risks, financial risks, and reputational risks and shall be reviewed at least annually for its continuing suitability.

In pursuit of this policy Global Infrastructure shall:

- Identify risk methodically conducting risk assessments to evaluate the likelihood and severity of identified risk and prioritise them based on their potential impact on people, the business, business objectives and the environment.
- Implement appropriate risk mitigating measures to control risk to an acceptable level
- Continuously monitor review and evaluate our risk management processes to identify opportunities for improvement, address emerging risk and enhance the effectiveness of our risk reduction efforts

- Comply with legislation, regulations and industry standards related to risk management and occupational health and safety.
- Create a risk reduction plan ensuring that roles and responsibilities are communicated clearly to employees, suppliers, customers and all stakeholders using positive and collaborative communication methods and understanding of risk reduction efforts.
- Provide our workforce with suitable training to ensure they have the correct knowledge, skills and competency to identify, assess and manage risks effectively.
- Encourage open and transparent communication surrounding risks, hazards and safety concerns amongst employees, departments and management to facilitate positive judgement and decision making.
- Review and investigate incidents, near misses, hazards and safety concerns identifying corrective action, cause analysis, sharing lessons learned to enhance risk awareness and prevent recurrence.
- Undertake regular analysis of statistics (KPIs) identifying and addressing any deficiencies in our efforts to continuously improve the effectiveness of current risk reduction measures for their suitability,
- Establish clear information to our employees and all stakeholders relating to instances/incidents of an unprecedented nature ie COVID-19 pandemic, in order to reduce risk to an acceptable level

All employees are responsible and accountable for adhering to this policy and participating in risk reduction initiatives. Risk reduction efforts, following this policy, established procedures and protocols, reporting hazards and near misses, and contributing to a culture of safety and risk awareness in the workplace.

It is the Policy of Global Infrastructure to ensure we provide adequate, carefully considered information in line with Scottish Government Guidelines, to protect the health, welfare and well-being of our employees during unprecedented times such as pandemic.

In pursuit of this policy Global Infrastructure shall provide the following advice and guidance, where necessary:

- Continually Assess and Review Exposure
  - Keep Communication Flowing
  - Provide Flexible Working Information
  - Deliver Updated Hygiene Advice & Symptoms
- 
- Advise on Self Isolation
  - Provide Official Government Guidelines
  - Supply Health & Mental Well-being Advice
  - Liaise with our Supply Chain
  - Distribute Useful Information

During challenging times such as pandemic, help and support is always available. Please do not forget there are helplines available if you feel you need to speak to someone at the end of a phone. There are also people in house and mental health first aiders who can offer you support. Mental Health first aiders are posted on all site noticeboards.

Your in-house contacts for any concerns are:

David MacDonald	Managing Director	David.macdonald@global-infra.co.uk	07885556860
Alan Niven	H&S Manager	Alan.niven@global-infra.co.uk	08971850916
Tanya Bartlet	Compliance Director	Tanya.bartlet@global-infra.co.uk	07912572911



### Useful Information

To minimise employee hardship and alleviate business strain during challenging times such as pandemic, the links below provide us with most up to date information relating to challenging occurrences and how best the government can provide help.

Useful links for any concerns:

Scottish Government

<https://www.gov.scot/coronavirus-covid-19/>

NHS Scotland

<https://www.nhsinform.scot/illnesses-and-conditions/infections-and-poisoning/coronavirus-covid-19>

NHS 111 Online Assessment

<https://111.nhs.uk/service/covid-19>

## **12. Confidential Reporting Policy**

Our aim is to develop a culture of openness so that any concerns that may exist about suspected wrongdoing within the company are properly reported.

We want to ensure that:

- you have the opportunity, and are encouraged, to raise a concern
- you can raise a concern without fear of harassment or victimisation;
- any concern you raise is taken seriously; and
- your concerns will be dealt with promptly in an appropriate manner.

The focus of this Whistle Blowing policy (the “Policy”) is on reporting concerns surrounding health & safety, fraud, regulation and competition law, financial reporting and the environment as we do not condone the activities of colleagues who achieve results through violation of the law or unethical business practices. There are no specific restrictions on the issues that may be raised using the processes outlined in this Policy, however, this policy is not designed to be a substitute for the established employee grievance procedures operating within Global Infrastructure. We want to ensure that colleagues who wish to report concerns can do so without fear of harassment or victimisation. However, colleagues who raise a concern that they know to be untrue or that is for personal gain will be subject to internal disciplinary procedures.

The Managing Director is responsible for maintaining this Policy on behalf of Global Infrastructure Ltd. And for Legal protection for those raising concerns  
The Public Interest Disclosure Act 1998 (the “PIDA”) protects workers (a defined term) from being subject to a detriment when they raise a concern or make a disclosure to their employer provided it is a “qualifying disclosure”. The PIDA encourages workers to raise a concern internally in the first instance.

For a disclosure to be a qualifying disclosure, a worker must have reasonable belief that the disclosure of this information suggests a relevant failure that happened in the past, is happening now, or is likely to happen in the future, which is of the following type:

a criminal offence;

- the breach of a legal obligation (e.g. a breach of contract or negligence);
- a miscarriage of justice;
- a danger to the health or safety of any individual;
- damage to the environment; or
- deliberate concealment of any information relating to the above.

The beliefs supporting concerns raised need not be correct – it might be discovered later that the workers were wrong – but the workers must show that they held the belief, and that it was a reasonable belief in the circumstances at the time of disclosure.

As already indicated, workers who raise a concern that they know to be untrue or that is for personal gain are not protected by the PIDA.

### **Reporting a Concern**

If you have a grievance relating to your employment, you should raise the matter under the established grievance procedures operating within Global Infrastructure. The first step should be discussing the issue with your Line Manager or in exceptional circumstances, with your director.

If you have a concern about suspected wrongdoing, where possible you should confide in your immediate Line Manager by sharing your concern with them. Your Line Manager will then contact Senior Management at Global Infrastructure, as appropriate, and ensure that you are kept informed.

If for some reason you believe confiding in your immediate Line Manager is not appropriate, for example because your concern might involve your immediate Line Manager or a more senior colleague, you can raise the concern outside the management line structure by contacting the Senior Management at Global Infrastructure.

You can send an anonymous letter to the Global Infrastructure Ltd, Beaulieu Quarry, Wester Balblair, By Beaulieu IV4 7BG. However, if you do raise the concern anonymously it will be more difficult for us to investigate the concern you raised, protect you and provide feedback to you.

Irrespective of what route you chose for reporting a concern, all steps will be taken to prevent your identity becoming known. If there is a situation (e.g. a legal requirement), which means that it is not possible to maintain your confidentiality, the best way to proceed will be discussed with you.

If you need advice in relation to the reporting of a concern, you can contact Public Concern at Work, an independent charity which provides free, confidential legal advice on Whistle Blowing matters.

#### Assessment and Investigation

Allegations will be reviewed by the Directors of Global Infrastructure Ltd and where appropriate further enquiries will be carried out to clarify the concern raised. The Directors of Global Infrastructure Ltd will then decide on an appropriate course of action based on the results of these enquiries. The format of the investigation will vary depending on the circumstances, but the objective is to ensure that a concern is dealt with promptly and in an appropriate manner.

The Directors of Global Infrastructure Ltd will communicate the findings of the investigation as appropriate and, if you have provided your contact details, to you.

The Directors of Global Infrastructure Ltd will report allegations found to be valid to the board of directors.

#### Contact Information

To report a concern outside the management line structure:

Telephone: 01463 870904  
or Email: [Tori.McStravock@global-infra.co.uk](mailto:Tori.McStravock@global-infra.co.uk)

For free legal advice on Whistle Blowing matters:

Public Concern at Work  
Suite 306  
16 Baldwins Gardens London  
EC1N 7RJ  
[www.pcaw.co.uk](http://www.pcaw.co.uk)

Telephone (general enquiries and helpline): 020 7404 6609  
Fax: 020 7404 6576  
Email  
UK enquiries: [whistle@pcaw.co.uk](mailto:whistle@pcaw.co.uk)  
UK helpline: [helpline@pcaw.co.uk](mailto:helpline@pcaw.co.uk)

The UK office is open, and the helpline is staffed from 9am to 6pm, Monday to Friday. There is an answering machine out of hours.

### **13. Drug, Alcohol & Smoking Policy**

Our employees are our most valuable resource, and their health and safety are of the utmost importance. The purpose of this Policy is to ensure that the possible consequences of alcohol or drug abuse on the individual, other employees, the public, environment, and the success of our business are reduced to a minimum.

This Policy applies to all employees, agents and sub-contractors engaged by Global Infrastructure (Scotland) Ltd and all visitors to Company premises.

The aim of this policy is to protect the health and safety of our employees and to help anyone who may be suffering from a drug or alcohol-related problem. The policy sets out the principles within which our business will usually work together with guidance for occasions when a problem arises.

The Company expressly prohibits:

- The use, possession, solicitation for or sale of narcotics or other illegal drugs, alcohol, or prescription medication (without a prescription) on Company or customer premises or while performing an assignment.
- Being impaired or under the influence of illegal drugs or alcohol away from the Company or customer premises, if such impairment or influence adversely affects the employee's work performance, the safety of the employee or of others, or puts at risk the Company's reputation.
- Possession, use, solicitation for, or sale of legal or illegal drugs or alcohol away from the Company or customer premises, if such activity or involvement adversely affects the employee's work performance, the safety of the employee or of others, or puts at risk the Company's reputation.

Illegal drugs are those classified as such in the Misuse of Drugs Act 1971.

All employees are personally responsible for their own health and safety and the safety of others who may be affected by their acts and omissions. Consumption of alcohol or drugs may affect an employee's ability to properly perform his or her job and may also endanger the health and safety of others. Employees are therefore required to advise their line manager if they are taking prescribed drugs.

Where appropriate, the Company will provide support internally and/or through external agencies to employees who seek help for a drug or alcohol problem.

The Company reserves the right to conduct drug and alcohol screening as part of the process for pre-employment selection. Any candidate who has a positive screen, or who refuses to provide the appropriate samples, will not be eligible for employment.

The Company reserves the right to conduct or require a random drug or alcohol screen on any employee whilst at work or on Company property. Such screening will only be carried out with the employee's consent. However, refusal to provide appropriate samples will lead the Company to draw its own conclusions and will certainly lead to disciplinary action.

Post-Accident Testing:- Any employee involved in an on-the-job accident or injury under circumstances that suggest use or influence of drugs or alcohol in the accident or injury event may be asked to submit to a drug and/or alcohol test. "Involved in an on-the-job-accident or injury" means not only the one who was injured, but also any employee who potentially contributed to the accident or injury event in any way.

Breach of this policy by an employee will be fully investigated and dealt with under the Company's Disciplinary Procedure. Depending on the nature of the conduct, the employee may be dismissed without notice.



All employees, agents or sub-contractors visiting or carrying out business on customers' premises shall comply with any alcohol/drug related rules, regulations and policies enforced by the customer. Failure to do so will result in disciplinary action.

Employees who by the nature of their duties are liable to be 'called-out' to work at short notice should consider this in the context of the overall Policy.

### **Procedures/Prevention and Rehabilitation**

The primary objectives of this policy are the prevention of the adverse effects of drugs and alcohol in the workplace and the early diagnosis, treatment and rehabilitation of employees who have alcohol or drug- related problems.

The Company will ensure that there are confidential means whereby employees can seek assistance and advice for any alcohol or drug related problem, whether by self-referral or at the request of the Company.

Any member of staff who believes that a work colleague has an alcohol or drugs problem must pass on this information in a confidential manner to their immediate Manager.

Employees should recognize that it is their responsibility and in their best interests to seek help at the earliest possible stage when treatment may be easier and before the problem affects work sufficiently to become a disciplinary matter.

The refusal of help or advice, unacceptable behaviour and/or continuous impaired performance of the abuser will result in disciplinary action.

### **Testing for Drugs and Alcohol**

Testing individuals for drugs and alcohol, whether by the Company or external agencies, will take place under the following circumstances:-

'With Cause' Conduct/Behaviour:- When it is suspected that a person's behaviour, actions, or omissions may be attributed to drink or drugs.

'With Cause' Post Incident/Accident:- As part of a commitment to thoroughly investigate incidents and where there is evidence to suggest those involved may be under the influence of drink or drugs and may have contributed to the incident or accident.

Self-Identification/Peer Intervention:- As part of an ongoing care programme and medical review of an individual's progress during care and rehabilitation. These take place either because of voluntary direct contact or encouragement to seek assistance via peer intervention or other programmes.

Random Testing:- As part of normal safety auditing, the company will periodically ask a random sample of employees at a site/office to undergo urinalysis testing.

### **Dealing With Results**

When a positive result is received (and this applies to a Company or customer test) the employee will be immediately suspended.

Disciplinary procedures in accordance with the Company Disciplinary Policy will ensue, leading to action (dependent on the circumstances) up to and including summary dismissal.

As far as practicable, the employee will be provided with a portion of the relevant sample in order that he/she may, if so desired, arrange their own private analysis of the sample.

### **General (Alcohol Related)**

During normal working hours, Global Infrastructure (Scotland) Ltd will not provide alcoholic drink for entertaining visitors.

Personnel whose drink-related problems have come to the attention of the Company will be given the opportunity to discuss the problem with their line Manager. Dependent on the circumstances, the company will normally offer help and advice and even counselling.

If an employee is convicted of drunk driving, they must inform their manager. If driving is an integral part of their job, then employment may be terminated (after due process) on the grounds of capability.

### **Smoking Policy**

This policy has been developed to protect all employees, customers, and visitors from exposure to second-hand smoke and to assist compliance with the Smoking, Health, and Social Care (Scotland) Act 2005. Exposure to second-hand smoke, also known as passive smoking, increases the risk of lung cancer, heart disease and other illnesses. Ventilation or separating smokers and non-smokers within the same airspace does not completely stop potentially dangerous exposure.

It is the policy of Global Infrastructure (Scotland) Ltd that all our workplace(s) are smoke-free and that all employees have a right to work in a smoke-free environment. Smoking is prohibited throughout the entire workplace, with no exceptions. This includes Company vehicles. This policy applies to all employees, consultants, contractors, customers, or members of the public and visitors.

Implementation:- Overall responsibility for policy implementation and review rests with Line Managers. All staff are obliged to adhere to, and to facilitate the implementation of the policy. The Line Managers shall inform all existing employees, consultants and contractors of the policy and their role in the implementation and monitoring of the policy. They will also have to give all new personnel a copy of the policy on recruitment/induction.

Appropriate "No Smoking" signs will be clearly displayed at the entrance to and within the premises.

Non-compliance:- Local disciplinary procedures should be followed if a member of staff does not comply with this policy. The procedures set out on Page 12 of the booklet "Helping to get your business or organisation ready for the new law on smoking" should be followed if a customer, visitor, or passenger does not comply. Those who do not comply with the smoking law are also liable to a fixed penalty fine and possible criminal prosecution.

## 14. Occupational Health Policy

The work of Global Infrastructure Ltd involves the exposure of employees to some health and safety hazards. It is the Policy of Global Infrastructure to eliminate harm and reduce risk by proactively managing our business systems and procedures.

Employers are required under the Management of Health and Safety at Work Regulations 1999 to carry out health and safety risk assessments and to introduce control measures to reduce any possible risks. The Directors of Global Infrastructure recognise their responsibility to ensure this, as far as is reasonably practicable.

Under the Management of Health and Safety at Work Regulations 1999 and the Control of Substances Hazardous to Health Regulations 2002, health surveillance is required in circumstances where an occupational risk to health remains despite control measures.

The primary purpose of health surveillance is the early detection of adverse health risks associated with work activity. It allows staff at increased risk to be identified and additional precautions to be taken, as necessary. It is also a means of checking the effectiveness of the existing control measures.

### Definitions:

A hazard is something with the potential to cause harm. The risk is the likelihood of that harm occurring and health surveillance is the monitoring of health in relation to a specific hazard to identify early health changes.

### Responsibilities:

Whoever individual companies delegate responsibility to, occupational health service personnel and employees all have responsibilities when it comes to occupational health.

The Directors are responsible for:

- ensuring Global Infrastructure Ltd carry out risk assessments
- allocating sufficient resources to allow appropriate follow-up action resulting from risk assessments to be taken
- arranging suitable training for Global Infrastructure Ltd and the responsible person to enable them to carry out their duties in respect of health surveillance
- Ensuring the organization has access to a robust occupational health service.

The H&S Manager is responsible for:

- ensuring risk assessments are carried out in their areas of responsibility
- ensuring adequate control measures are put in place to reduce risks as far as possible
- seeking advice on risk reduction from a safety advisor, occupational hygienist, or other relevant person as necessary
- seeking the advice of the relevant people on the need for health surveillance where it is thought that a residual health risk remains following the implementation of control measures
- Ensuring employees co-operate with health surveillance procedures provided
- Discussing with the relevant people any health concern brought to their attention by an employee

The responsible people are responsible for:

- assisting with the risk assessment process as requested by team leaders
- carrying out health surveillance of employees in line with agreed procedures
- maintaining health surveillance records and arranging recalls at the appropriate intervals
- Informing Managing Director and the Directors about levels of compliance with health surveillance procedures

The occupational health service is responsible for providing appropriately qualified personnel to:

- Help identify the need for health surveillance programs.
- assist with the risk assessment process as requested by Global Infrastructure Ltd
- carry out health surveillance in line with agreed procedures
- maintain health surveillance records and arrange recalls at the appropriate time
- Inform Managing Director and the SHEQ Manager about levels of compliance with health surveillance procedures.

Employees must:

- co-operate with health surveillance procedures
- report health problems which may be associated with work to their HSEQ Manager
- Co-operate with any control measures implemented to protect their health.

The following points should be considered to help determine if health surveillance is required:

- Is there an identifiable disease or condition related to the work activity?
- Are valid techniques available to detect indications of the disease or condition?
- Is it possible the disease or condition may occur in this working environment?
- Is surveillance likely to assist in the protection of the health of the employees concerned?
- Does any specific legislation requiring health surveillance apply?

## Identifying the Need for Health Surveillance

The health surveillance techniques used will depend on the hazard and degree of risk.

### Health Record

In its simplest form, a written health record detailing the type of exposure must be kept. The health record must include:

The individual's:

- Surname
- forenames
- gender
- date of birth
- permanent address
- National Insurance (NI) number
- the date the employee started his or her present job
- a record of previous exposures to hazards for which health surveillance is required in the present job
- the dates of all health surveillance procedures and the names of the people who carried them out

The conclusions drawn from the surveillance, including whether the individual is fit to work and the decisions of the qualified or responsible people, but not clinical information.

### Health Surveillance

If a reliable test can be carried out, the format of health surveillance may include the use of questionnaires to determine symptoms and may also involve clinical examination or measurements, such as lung function testing, hearing tests or biological sampling.

## Frequency of Health Surveillance

The level of risk determines the frequency of health surveillance programmes. Where the risk is thought to be low, only baseline data will be required, and staff should report to the SHEQ Manager if any problems are experienced. Baseline data will usually be gathered at the employment health interview. If the risk is thought to be more significant, periodic health surveillance for all exposed staff should take place. In most cases this will be annual, however in some high-risk areas a more frequent program may be agreed.

The minimum surveillance required for commonly used substances in Global Infrastructure Ltd is summarized in the table below. More frequent surveillance may be required where a person's medical history suggests a particular vulnerability. The responsible person or occupational health nurse will make this decision and manage the recall process.

Area	Substance	Action	Recall
Lung		Spirometry and Questionnaire Baseline	6 weeks, 6 months then annual if results normal
Lung			
Lung			
Lung			
Lung			
Skin		Questionnaire and Examination Baseline	Annual Review
Skin			
Skin			
Skin			
Skin			
Audiogram	Noise	Questionnaire and Audiogram Baseline Category 1	Annual for first 3 years then 3 yearly
Audiogram	Noise	Baseline Category 2	6 months then Annual
Audiogram	Noise	Baseline Category 3	3 months refer to Doctor then 6 monthly
Forklift Operator		Screening and Baseline	2 yearly

If health problems are identified following health surveillance, control measures should be reviewed and where necessary enhanced.

The occupational health nurse or doctor will advise on any specific actions to take about the affected employee, e.g.:

- reducing the length of exposure
- restricting work activities which cause exposure
- re-deploying the affected employee
- Advising on additional personal protective equipment (PPE)

### Eye Protection

Should an employee require spectacles for the purpose of his/her work, an amount to the value of £100 may be applied for providing an initial enquiry has been approved through his/her line manager prior to:

- an eye examination taking place
- production of a receipt

The employee's Line Manager shall only give their authorisation following the above process.

Once authorisation has been given, a receipt must be provided before a claim can be applied for. Record Keeping  
The responsible person or Occupational Health nurse will, with the support of Human Resources, ensure employees requiring health surveillance are identified and recalled at appropriate intervals. All data collected will be subject to the Data Protection Act 1998.

## 15. HAVS Policy

It is the policy of Global Infrastructure to eliminate harm and reduce business risk by proactively managing our business systems and procedures. To ensure this is carried out the following points must be adhered to:

Hand Arm Vibration Syndrome (HAVS) is a condition caused by the prolonged use of vibrating tools and equipment. It is important that HAVS is managed using specific control measures to minimise the risk. In pursuit of this policy Global Infrastructure shall:

- Risk Assess exposure in the workplace involving vibrating tools and equipment
- Provide training and awareness providing knowledge and skills for employees to determine exposure limits. Training to include sources, health effects, risk levels, recognising symptoms and how to minimise the risk.
- ensure their employees are suitably trained on safe tool use.
- Communicate effectively, regularly, and collaboratively ensuring all employees are clear on their roles and responsibilities
- Incorporate Purchasing consideration when buying to reduce risks from vibration to the lowest possible level and to make sure we receive data on vibration levels from suppliers.
- Compile a list of equipment known to cause vibration relating this information back to the end users regarding vibration levels and time limiting use of equipment. This information will be posted on all site notice boards.
- Carry out plant maintenance at regular intervals.
- Report, investigate and record corrective actions to prevent future recurrence.
- Where possible use alternative methods to reduce or eliminate exposure to vibration as follows:
  - Limit the time that employees are exposed to vibration by regular rotation of workers.
  - Provide suitable gloves to keep the workers hands warm and dry.
  - Provide employees with health surveillance which may determine if they are showing any symptoms of HAVS.
  - Use Reactec watches to control/limit exposure time

By implementing this HAVS Policy our aim is to protect the health and well-being of our employees and minimise the risk of HAVS-related injuries and liabilities.

## 16. Social Media Policy

As the world of social media grows it offers each of us new opportunities to connect with people and find out more about the things that interest us. We believe that the use of certain social media platforms can help to strengthen and develop relationships as well as demonstrating what our business has to offer.

Remember! Everything is public

- Even with privacy settings in place Remember - Everything is public.
- Once you post something, even with privacy settings in place it becomes anyone's information.
- All postings on behalf of, or about the company must be carried out by key personnel only.
- Stick to what you know and if in doubt ask.

Think HSEQ

- We encourage site photographs to be taken and forwarded to BusinessSupport.
- Uploading of 'on-site' photos must conform to HSEQ protocol.
- Check if the subject is wearing PPE, e.g. High Vis clothing, hard hats, ear defenders, gloves, or safety glasses for example.
- Confidentiality agreements with clients may be in place so if in doubt please check with Directors.

Be honest

- Protect yourselves and the business.
- Always respect copyright laws, so if you are sharing someone else's hard work, give them credit for it and where possible include a link to the source.
- If you are uncertain about something you want to post or see something you feel is inappropriate then, please check with the Directors. You can also contact either your line Manager or HR.



## **17. Fatigue Management Policy**

At Global Infrastructure we care about and are committed to the health & safety of all our employees, we actively work to prevent and manage risks associated with fatigue in the workplace.

Fatigue does not have a clear scientific definition but is a feeling of tiredness and being unable to perform work effectively.

Specifically, a fatigued person will be less alert, less able to process information, will have slower reaction times and less interest in working compared to a person who is not fatigued.

Our responsibility is to manage risks from fatigue, irrespective of any individual's willingness to work extra hours or preference for certain shift patterns for social reasons and to reduce error or violations at work. We therefore endeavour to:

- Ensure adequate opportunity is available for employees to have sufficient rest before commencing work, through appropriate working time arrangements.
- Monitoring and control working hours, including overtime, to provide time arrangements that do not require excessive periods of wakefulness.
- Ensure employees take regular quality rest breaks throughout their shift.
- Ensure employees can get enough rest between their shifts.
- Encourage employees to develop good sleeping habits.

Points to be aware of...

- Individuals are not good at assessing how fatigued they are.
- They can be skilled at coping with fatigue, but this can increase stress or the risk of gastric disorders or other health problems.
- Shorter and more shifts may not solve the problem – errors rise early on, diminish then peak later.

## **18. Violence at Work Policy**

As a responsible employer we have formulated this policy to ensure, as far as is reasonably practicable, the health, safety, and welfare at work of all our employees.” These include the provision of a safe place and safe systems of work for our staff, sub-contractors, agency personnel and others who may be affected by our business activities.

We recognise that potential violence i.e. any incident in which the person is abused, threatened, or assaulted in circumstances relating to their work, alongside threatening behaviour, are issues of concern to many staff and we resolve to do all that is reasonably practicable to reduce the risk of such events.

### Management responsibilities

Managers / Supervisors have a responsibility to ensure this policy is always adhered to including undertaking risk assessments of work which may put staff at risk from violence (when necessary), making changes to the physical environment, ensuring that there are safe procedures for staff to follow, supervising to ensure procedures are followed, and investigating any incidents

### Employees' responsibilities

All employees have a responsibility to take reasonable steps to ensure that they do not place themselves, or others, at risk of harm. Employees are also expected to co-operate fully with us in complying with any procedures that we may introduce as a measure to protect the safety and wellbeing of our staff and visitors.

The safety of our staff is paramount. So, if anyone finds themselves dealing with rude or aggressive visitors, they must never return aggression as this is how anger can escalate into violence. In the unlikely event that a situation escalates, staff should always withdraw from it.

If employees require training or have concerns about existing procedures, they must raise this with their supervisor.

## 19. Privacy Policy

Global Infrastructure (Scotland) Ltd (“the Company”) is committed to meeting the data protection obligations under the General Data Protection Regulations (“GDPR”).

The purpose of this policy is to make you aware of how the Company intends to collect, handle, process, and store personal data in line with the data protection standards, both during and after the working relationship.

To manage the working relationship of the Company it is required to collect and process certain *personal information (“data”) about individuals. Data Protection Principles*

GDPR have set out the six main responsibilities that the business must comply with. These state that the personal data we hold must be:

1. Processed lawfully, fairly and in a transparent manner.
2. Collected for specified, explicit and legitimate purposes.
3. Adequate, relevant, and limited to what is necessary.
4. Accurate and where necessary kept up to date.
5. Kept in a form which permits identification to data subjects for no longer than is necessary for the purpose for which those data are processed.
6. Processed in a way that ensures appropriate security of the data.

### **The Kind of Information We Hold About You**

We will, where applicable, collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses
- Date of birth
- Gender
- Next of kin and emergency contact information
- National Insurance number
- Birth Certificate
- Bank account details, payroll records and tax status information
- Salary, annual leave, pension, and benefits information
- Start date and end date
- Location of workplaces
- Copy of driving licence
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process)
- Employment records (including job titles, work history, working hours, training and competency records and professional memberships)
- Compensation history
- Performance information
- Disciplinary and grievance information

- CCTV footage at main office and work sites
- Information about your use of our information and communications systems
- Work related photographs
- Criminal checks and all associated documentation

We may also, where applicable, collect, store, and use the following “special categories” of more sensitive personal information:

- Information about your health, including any medical condition, health, and sickness records
- Information about driving or criminal offences

### **How We Will Use Information About You**

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- To fulfil the agreed contract of employment or contract of service.
- Where there is a need to comply with a legal obligation.
- Where necessary for the Company’s legitimate business interests providing this does not affect the individuals’ rights.

Some examples may include:

- To maintain up to date and accurate records.
- To comply with statutory, regulatory obligations such as eligibility to work in the UK by checking birth certificates and or passports.
- Operate and maintain records of personal development, training, annual leave, absence, and health.
- Administering the contract we have entered with you.
- Business management and planning, including accounting and auditing.
- Conducting performance reviews, managing performance, and determining performance requirements.
- Assessing qualifications for a particular job or task, including decisions about promotions.
- Education, training, and development requirements.
- Ascertaining your fitness to work
- Complying with health and safety obligations.

### **Change of Purpose**

We will only use personal information for the purposes for which we collected it, unless we consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

### **How Your Personal Information Will Be Collected**

The Company collects, processes, and stores a range of personal information about individuals through the application and recruitment process, either directly from candidates or sometimes from an employment agency.

We may, where necessary, collect additional personal information during job-related activities throughout the period of you working for us.

## Responsibilities

The following personnel within Global Infrastructure have responsibility for Data Protection:

1. Strategic management to ensure the Company is fulfilling its overall responsibilities  
David MacDonald (Managing Director)
2. Compliance with legal provisions  
Tanya Bartlet (Compliance Director)
3. Day to day processing of information  
Tori McStravock (HR Advisor)  
Karen Hutchison (Accounts Office Manager)

However, it should be noted that all employees of Global Infrastructure have a responsibility for ensuring data is collected, processed, stored, and handled in accordance with the data protection principles.

## Data Sharing

Personal information may be shared within departments in the business.

The business may also share your personal information with third-party service providers including:

- Occupational health providers
- Pension scheme provider
- External auditors
- Training providers
- Disclosure and Barring Service (DBS)

## Protecting Personal Data and Storage

The Business has put procedures and strict measures in place to minimise the risk of personal information from been accidentally lost, destroyed, altered, disclosed, or accessed and used in an unauthorised way. Access is granted on an as required basis to data processors, managers and other third parties who have a business and legal requirement to access personal information to perform their role and responsibilities.

Third parties are only granted permission to process individuals' personal information for the specified purpose and not for their own purposes.

In the event of a significant impact data security breach the business will notify the Information Commissioners Office and all affected individuals within 72 hours.

All personal data whether it be stored in paper or electronic format will be always kept secure (under lock and key or password protected) and may only be accessed by authorised persons. All employees should take care in ensuring the following are adhered to when dealing with personal data:

- Data printouts are collected and not left where unauthorised individuals may see them.
- Data printouts are shredded and disposed of securely when no longer required.
- Electronic data should be protected with a strong password which should be changed regularly.
- The business highly discourages it, but in the unlikely event of data been stored on removable media (eg. CV's and Memory Sticks) these must be kept locked away securely when not in use.

- Data must only be stored on designated drives, servers and in Office 365.
- If personal data can be accessed via mobile phones whether these be personal or Company phones (this includes business email) then they must be password protected and anti-virus software installed. (Please contact the IT department if you require any assistance with this).
- Data should never be saved directly to laptops, tablets, and mobile phones.
- Computers and laptops must be left locked if leaving workstations.

## Retention Period

The Company will only retain personal information for as long as deemed necessary.

Personal information will normally be retained for up to 7 years following termination of employment or engagement. This excludes any Health Surveillance records, and these will be retained according to statutory provisions.

All personal information held will be securely and effectively destroyed or permanently erased from IT systems when no longer necessary to be held.

To keep personal information accurate and up to date the Company will annually request updates from individuals on their personal information via Employee Update, Health Questionnaire and Driver Declaration forms (where applicable).

Although we ask that individuals, please keep us informed of any changes as they occur, (eg. Home address, contact number, emergency contacts), the business cannot take responsibility of any errors in your personal information in this regard unless you have notified the business of any changes.

Subject to certain conditions and in some circumstances, individuals have a number of statutory rights. The GDPR

includes the following rights for individuals:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to object to processing

For more information on your rights please visit the Information Commissioner Office website at [www.ico.org.uk](http://www.ico.org.uk). Individuals may also contact the Business Support Manger for further information or if you wish to exercise any of these rights. As a security measure the business may request specific information from individuals to verify identity in the event of a request to exercise any of the above rights.

## Changes to This Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates.

## Who to Contact

If you have any questions relating to this policy, please contact Tori McStravock (HR Advisor) on email at [tori.mcstravock@global-infra.co.uk](mailto:tori.mcstravock@global-infra.co.uk)

Information Commissioners Office Registration Reference: ZA3278

## 20. IT & Internet Policy

Global Infrastructure (Scotland) Ltd are supported by Global Energy Group management who are committed to implementing appropriate strategies and policies that develop, support, and maintain IT services for Global Infrastructure Ltd ensuring an effective and reliable foundation on which Global Infrastructure can compete in the marketplace.

Global Energy IT Department are committed to providing:

- Technical Services - responsible for all IT services, infrastructure, and software related support development for Global Infrastructure Ltd
- Business Solutions - responsible for the Analysis and Development of internal IT Systems and their integration with 3rd party applications
- Global IT Department who are the point of contact for all IT issues for Global Infrastructure Ltd
- Global IT department who will manage 3rd parties who are engaged to supply specialist support and delivery services on behalf of IT
- Global Infrastructure will comply with and adhere to IT policies with regards to the procurement and support of IT services, software, and equipment
- Industry standard IT policies and processes to ensure that Global Infrastructure meets acceptable standards in the deployment, development, maintenance, installation, and support of its technology
- Procedures and practices which aim at protecting the company's information assets from all threats, deliberate, malicious, or accidental
- Technical Services which will endeavour to operate within the ITIL and ISO27001 framework or any other standards as deemed necessary at the time
- A service which is customer focused, value for money and meets the needs of the businesses

Cyber Essentials is the most recent addition to our accreditations and certifications portfolio. This has provided the business with a competitive edge, in addition to enhancing its resilience against cyber threats by:

- Establishing a strong foundation for protecting their systems and data
- Building trust and credibility with stakeholders, customers and partners
- Demonstrating compliance with various regulatory requirements
- Reducing risk through the implementation of cybersecurity scheme controls

Responsibility for the execution and application of this policy and of detailed policies and procedures, in line with this policy statement, rests with the management of Global Infrastructure Ltd.

The policies attached herein are reviewed annually as a minimum, to ensure their continuing suitability.



David MacDonald  
Managing Director  
01/04/2024