Tudor Rose
COMPANY HANDBOOK

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Introduction

The purpose of this non-contractual Company Handbook is to provide you with a wide range of information relating to your employment with Tudor Rose Holdings Ltd. (Tudor Rose or 'the Company'). While we do not seek to create a rules- based culture, it is important to have a clear framework that both company and employee understand and operate within. To that end, this handbook explains our policies, mission statement, company values and other important matters that you need to know.

All items in the handbook are 'non-contractual'. They do not therefore form part of your terms and conditions of employment and might be changed or varied at any time without notice, on any individual basis, across areas of the Company or across the Company as a whole. Apart from statutory' items where law may determine entitlements, any changes in contractual items will be confirmed to you in writing.

The Handbook can be found on the Company SharePoint page and you should refer to it for any information you need. If further information on any point is required please ask your line manager or the Head of Operations for further clarification.

To indicate that you have read and understood the information contained in this Company Handbook please either sign and return the slip below to your line manager, or click in the box below to make the confirmation in an email to the HR manager.

CLICK HERE to confirm that you have read and understand the information contained in this company handbook

I confirm that I have read and understood this company handbook and agree to abide by the content, rules and procedures detailed.

Tudor Rose – our business

Tudor Rose – our business

Tudor Rose is an integrated publishing and marketing services company, organised to fulfil the demands of both small and global organisations. We provide a calm, friendly, reliable and creative service, based on good relationships and a common-sense approach to business, offering good value in every sense of the word.

Each of our employees offers unique skills and perspectives that combine to provide results of the highest quality. The Company has an abundance of energy and common sense, and individuals that achieve excellence in their craft. This creates a working environment that breeds brilliance.

Our mission statement is 'to deliver high quality products and services that meet a client's brief and exceed their expectations.'

Our values are:

- Fresh – innovative thinking and bright ideas
- Intelligent – well-informed and thoughtful advice
- Composed – a keen eye and calm under pressure
- Candid – honest and quick to the point
- Diligent – deadlines met within budget.

For further information about Tudor Rose, its clients and portfolio of products and services, please refer to the Company and product-specific websites which include:

www.tudor-rose.co.uk

www.technologyrecord.com

www.golfcoursearchitecture.net

www.cruiseandferry.net

www.humandevelopment.org

Employee benefits

Employee benefits

ANNUAL LEAVE

Tudor Rose recognises that it is important for employees to take regular breaks from work through annual leave and encourages everyone to utilise their full entitlement within the calendar year to protect your well-being and to ensure that you are getting the time away from work that you need.

Holiday requests are based on the following principles:
- Every effort will be made to meet holiday requests but the Company reserves the right to consider holiday requests in line with the needs of the business
- All employees have their own *Timetastic* account to manage annual leave bookings and balances
- Holiday requests are only considered 'authorised' when they have been approved by your line manger via the Timetastic planner
- Holiday requests will be approved on a first-come first-served basis to ensure that all departments are always adequately staffed to meet the Company's requirements.

A maximum of 5 days leave each year may be carried over. The 5 days may only be exceeded in exceptional circumstances with the agreement of the manager. No payments will be made in lieu of accrued but untaken holiday, except on termination of employment where it has not been possible or practical for employees to take the leave.

In the case of long-term absence (continuous absence of 12 weeks or more) where the employee is unable to take their holiday during the calendar year due to sickness, the Company will allow the employee to carry over holiday entitlement to the next holiday year. In such cases, entitlement will be based on and limited to the statutory holiday entitlement rather than any higher level of contractual holiday. Specific rules apply to maternity and paternity leave.

WORKING FROM HOME

Remote working is the term used for employees who work away from the main Tudor Rose office in Leicester. You can request a remote working arrangement through our flexible working policy on either:
- An occasional basis – where you have a main office base with some remote working at home. By its nature, occasional working from home can only be agreed on an ad hoc informal basis
- A regular basis – where there is an agreement for you to work from home for a specified number of days with the remainder of days spent working in the office
- A contractual basis – where your home is your main place of work.

Arrangements for remote working on a regular basis must be discussed with and approved by your line manager. Remote working is based on the following principles:
- The company is committed to flexible working provided that the needs of both the company and the employee can be met
- Remote workers may be required to use a hot desk during their office working days
- Remote workers may be expected to attend the office for a day that they typically work from home
- Working days are required to be spent entirely in one location
- The Tudor Rose office in Leicester will remain the primary working address for employees with occasional and regular remote working arrangements
- The company reserves the right to change remote working agreements dictated by the needs of the business.

Employee benefits

SICKNESS ABSENCE POLICY

This Sickness Absence Policy sets out our procedures for reporting sickness absence and for the management of sickness absence in a fair and consistent way. Any absence from work represents a cost to the business, causes disruption to the workflow and places additional pressures upon your colleagues The Company therefore keeps a record of your attendance and monitors it on a regular basis. However, there are occasions when absence for whatever reason is unavoidable, for example through illness, and the following procedure must be followed.

Sickness absence can vary from short intermittent periods of ill-health to a continuous period of long-term absence and have a number of different causes (for example, injuries, recurring conditions, or a serious illness requiring lengthy treatment).

We wish to ensure that the reasons for sickness absence are understood in each case and investigated where necessary. In addition, where needed and reasonably practicable, measures will be taken to assist those who have been absent by reason of sickness to return to work.

This policy applies to all employees. It does not apply to agency workers, consultants or self-employed contractors.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Managers have a specific responsibility to ensure the fair application of this policy and all members of staff are responsible for supporting colleagues and ensuring its success.

Notification
You should refer to your contract for details of our sickness absence reporting procedure.
If you do not have a sickness absence reporting procedure in your contract, you should follow the procedure set out below.

If you are taken ill or injured while at work you should notify your line manager. If your line manager is not available you should inform a colleague and they should in turn inform a manager as soon as they can. If necessary a manager will make arrangements for anyone who is unwell to be accompanied home or to receive medical treatment where necessary.

If you are unable to attend work you must telephone your line manager within one hour of your normal start time, giving the reason for the absence and anticipated length of absence. The line manager will then enter your absence on Timetastic. It is not acceptable for text messages, e-mails or voice messages to be left to notify your line manager of your absence – you must speak with your line manager directly by telephone or if not available, the Head of Operations. Should the absence continue beyond a day, the employee should keep the line manager updated.

In the case of absences lasting up to and including five working days or seven calendar days, employees must complete and deliver a Self Certification Form to the Operations Department.

For any sickness absence longer than this, a Statement of Fitness for Work (Doctor's note) or hospital certificate must be provided. Tudor Rose will, wherever feasible and in line with any Statement of Fitness for Work, seek to promote a return to work and would wherever appropriate make reasonable adjustments to help in this. Failure to provide, or delay in providing, any necessary documentation to the finance department may result in loss of entitlement to sickness benefit or Statutory Sick pay.

Where sickness duration extends beyond what has been previously advised to the manager or on any form of certificate, you must again contact your line manager. This contact must follow the same procedures as any initial instance of absence, advising the line manager of the change and of the revised anticipated return to work date.

Cases of unauthorised absence will be dealt with under our Disciplinary Procedure.

Absence that has not been notified according to the sickness absence reporting procedure will be treated as unauthorised absence.

Employee benefits

Disabilities
We are aware that sickness absence may result from a disability. At each stage of the sickness absence meetings procedure, particular consideration will be given to whether there are reasonable adjustments that could be made to the requirements of a job or other aspects of working arrangements that will provide support at work and/or assist a return to work.

If you consider that you are affected by a disability or any medical condition which affects your ability to undertake your work, you should inform the Head of Operations.

Sick Pay
You may be entitled to Statutory Sick Pay (SSP) if you satisfy the relevant statutory requirements. Qualifying days for SSP are Monday to Friday, or as set out in your employment contract.

You may be entitled to receive Company sick pay should the Company choose to exercise their discretion to pay you. You qualify for company sick pay after 6 months of service. After this time you will be receive and entitlement of 1 week of sick pay for each full year of continuous employment up to a maximum of 12 weeks.

However the Company will not exercise their discretion to pay Company Sick Pay in the following (non-exhaustive) circumstances:

- Where the employee has knowingly provided false information.
- Where the employee undertakes activity that might hamper recovery/return to work.
- Where the employee has failed to follow this policy and rules.
- If there are serious doubts about the circumstance surrounding the claim for sick pay.
- If the employee's absence record is, in the Company's opinion, excessive.
- If the absence is caused by negligence, recklessness or carelessness by you in observing standard safety practices or by wilful misconduct in or outside of the workplace.
- If the absence is caused by any self-inflicted illness or injury including those primarily caused by your failure to heed medical advice.
- If the absence is caused through injury in any sport – you are advised to take your own personal accident insurance cover.
- If the absence is caused through illness or injury caused by any outside employment or outside activity.
- If the absence is caused through illness or injury caused by any outside employment or charity parachute jump or run or similar activity.
- If the absence is caused through any kind of dependency, whether that be substance (including smoking) or alcohol abuse, in the written opinions of a medical practitioner.
- If the absence is caused by treatment which the employee has chosen to undergo – for example cosmetic surgery

The Company reserves the right to review, change and withdraw the sickness benefit scheme itself, across the Company as a whole or in individual cases following investigation and consultation. Benefits under the scheme are entirely non-contractual and discretionary.

Sick Leave
If you become sick or injured while on annual leave such that you would be unfit for work you may ask us to treat the period of incapacity as sick leave and reclaim the annual leave.

To be able to claim company sick pay you must notify your manager of your incapacity immediately, and the usual requirements for medical evidence in this policy will also apply, even if you are abroad.

If you are on sick leave you may choose to cancel any pre-arranged annual leave that would otherwise coincide with your sick leave. You should notify your manager as soon as possible that you wish to do this.

If your period of sick leave extends into the next holiday year, or if there is not enough time left in the current holiday year to make it practicable to take your remaining holiday entitlement, you can carry any unused holiday entitlement over to the following leave year to be used within three months of your return to work. Any annual leave not taken within 15 months of the end of the holiday year in which it accrues (whether or not you have returned to work) will be lost.

Employee benefits

Keeping in Contact During Sickness Absence
If you are absent on sick leave you should expect to be contacted from time to time by your line manager in order to discuss your wellbeing, expected length of continued absence from work and any of your work that requires attention. Such contact is intended to provide reassurance and will be kept to a reasonable minimum.

If you have any concerns while absent on sick leave, whether about the reason for your absence or your ability to return to work, you should feel free to contact your line manager at any time.

Infectious/contagious diseases
You are required to notify your line manager if you come into contact with anyone suffering an infection or contagious disease or you contract one yourself. The Company may require you to stay at home or take precautionary measures according to medical advice. All such matters will be treated confidentially.

Medical Examinations
We may, at any time in operating this policy, require you to consent to a medical examination by a doctor nominated by us.

You will be asked to agree that any report produced in connection with any such examination may be disclosed to us and that we may discuss the contents of the report with our advisers and the relevant doctor.

Return to Work Interviews
When an employee's absence level is higher than average or where the line manager feels there is a need, you may be asked to attend a return-to-work interview directly after an absence.

The purpose of this interview is to:

- Determine the reason for your absence and, where applicable, to complete the necessary self- certificate.
- Ascertain if there are any underlying reasons for your absence.
- Advise if there are any concerns regarding your levels of absence or the circumstances.
- Enable you to notify your line manage of any special circumstances you wish the Company to be aware of.

Employees must not return to work against a doctor's advice. The Company reserves the right to suspend an employee whether certified as sick or not, if it is felt to be in the interests of the employee and/or others.

Returning to Work From Long-Term Sickness Absence
As a company we are keen to promote a return to good health and, of course, a return to work. After an extended period of absence through illness, the Company may offer alternative, light duties or reduced working hours to assist the employee's return to full-time working. As part of our sickness absence meetings procedure, we will, where appropriate and possible, support returns to work by:

- Obtaining medical advice.
- Making reasonable adjustments to the workplace, working practices and working hours.
- Considering redeployment.
- Agreeing a return-to-work programme with everyone affected.

If you are unable to return to work in the longer term, we will consider whether you are entitled to any benefits under your contract and/or any insurance schemes we operate.

Sickness Absence Meetings Procedure
We may apply this procedure whenever we consider it necessary, including, for example, if you:

- Have been absent due to illness on a number of occasions.
- Have discussed matters at a return-to-work interview that require investigation.
- Have been absent for more than six weeks..

Unless it is impractical to do so, we will give you one weeks' written notice of the date, time and place of a sickness absence meeting. We will put any concerns about your sickness absence and the basis for those concerns in writing or otherwise advise why the meeting is being called. A reasonable opportunity for you to consider this information before a meeting will be provided.

The meeting will be conducted by your line manager. You may bring a companion with you to the meeting.

You must take all reasonable steps to attend a meeting. Failure to do so without good reason may be treated as misconduct. If you or your companion are unable to attend at the time specified you should immediately inform your line manager, who will seek to agree an alternative time.

A meeting may be adjourned if your line manager is awaiting receipt of information, needs to gather any further information or give consideration to matters discussed at a previous meeting. You will be given a reasonable opportunity to consider any new information obtained before the meeting is reconvened.

Confirmation of any decision made at a meeting, the reasons for it, and of the right of appeal will be given to you in writing within one week of a sickness absence meeting (unless this time scale is not practicable, in which case it will be provided as soon as is practicable).

If, at any time, your line manager considers that you have taken or are taking sickness absence when you are not unwell, they may refer matters to be dealt with under our Disciplinary Procedure.

Right to be Accompanied at Meetings
You may bring a companion to any meeting or appeal meeting under this procedure.

Your companion may be either a trade union representative or a colleague. Their details must be given to the manager conducting the meeting, in good time before it takes place.

Employees are allowed reasonable time off from duties without loss of pay to act as a companion. However, they are not obliged to act as a companion and may decline a request if they so wish.

We may at our discretion permit other companions (for example, a family member) where this will help overcome particular difficulties caused by a disability, or difficulty understanding English.

A companion may make representations, ask questions, and sum up your position, but will not be allowed to answer questions on your behalf. You may confer privately with your companion at any time during a meeting.

Stage 1: First Sickness Absence Meeting
This will follow the procedure set out above on the arrangements for and right to be accompanied at sickness absence meetings. The purposes of a first sickness absence meeting may include:

- Discussing the reasons for absence.
- Where you are on long-term sickness absence, determining how long the absence is likely to last.
- Where you have been absent on a number of occasions, determining the likelihood of further absences.
- Considering whether medical advice is required.
- Considering what, if any, measures might improve your health and/or attendance.
- Agreeing a way forward, action that will be taken and a timescale for review and/or a further meeting under the sickness absence procedure.

Stage 2: Further Sickness Absence Meetings
Depending on the matters discussed at the first stage of the sickness absence procedure, a further meeting or meetings may be necessary. Arrangements for meetings under the second stage of the sickness absence procedure will follow the procedure set out above on the arrangements for and right to be accompanied at sickness absence meetings.

The purposes of further meeting(s) may include:

- Discussing the reasons for and impact of your ongoing absence(s).
- Where you are on long-term sickness absence, discussing how long your absence is likely to last.
- Where you have been absent on a number of occasions, discussing the likelihood of further absences.
- If it has not been obtained, considering whether medical advice is required. If it has been obtained, considering the advice that has been given and whether further advice is required.
- Considering your ability to return to/remain in your job in view both of your capabilities and our business needs and any adjustments that can reasonably be made to your job to enable you to do so.
- Considering possible redeployment opportunities and whether any adjustments can reasonably be made to assist in redeploying you.
- Where you are able to return from long-term sick leave, whether to your job or a redeployed job, agreeing a return-to-work programme.
- If it is considered that you are unlikely to be able to return to work from long-term absence, whether there are any benefits for which you should be considered.
- Agreeing a way forward, action that will be taken and a timescale for review and/or a further meeting(s). This may, depending on steps we have already taken, include warning you that you are at risk of dismissal.

Stage 3: Final Sickness Absence Meeting
Where you have been warned that you are at risk of dismissal, we may invite you to a meeting under the third stage of the sickness absence procedure. Arrangements for this meeting will follow the procedure set out above on the arrangements for and right to be accompanied at sickness absence meetings.

The purposes of the meeting will be:

- To review the meetings that have taken place and matters discussed with you.
- Where you remain on long-term sickness absence, to consider whether there have been any changes since the last meeting under stage two of the procedure, either as regards your possible return to work or opportunities for return or redeployment.
- To consider any further matters that you wish to raise.
- To consider whether there is a reasonable likelihood of you returning to work or achieving the desired level of attendance in a reasonable time.
- To consider the possible termination of your employment.

Termination will normally be with full notice or payment in lieu of notice.

Appeals
You may appeal against the outcome of any stage of this procedure and you may bring a companion to an appeal meeting.

An appeal should be made in writing, stating the full grounds of appeal, to your line manager within one week of the date on which the decision was sent to you.

Unless it is not practicable, you will be given written notice of an appeal meeting within one week of the meeting. In cases of dismissal the appeal will be held as soon as possible. Any new matters raised in an appeal may delay an appeal meeting if further investigation is required.

You will be provided with written details of any new information which comes to light before an appeal meeting. You will also be given a reasonable opportunity to consider this information before the meeting.

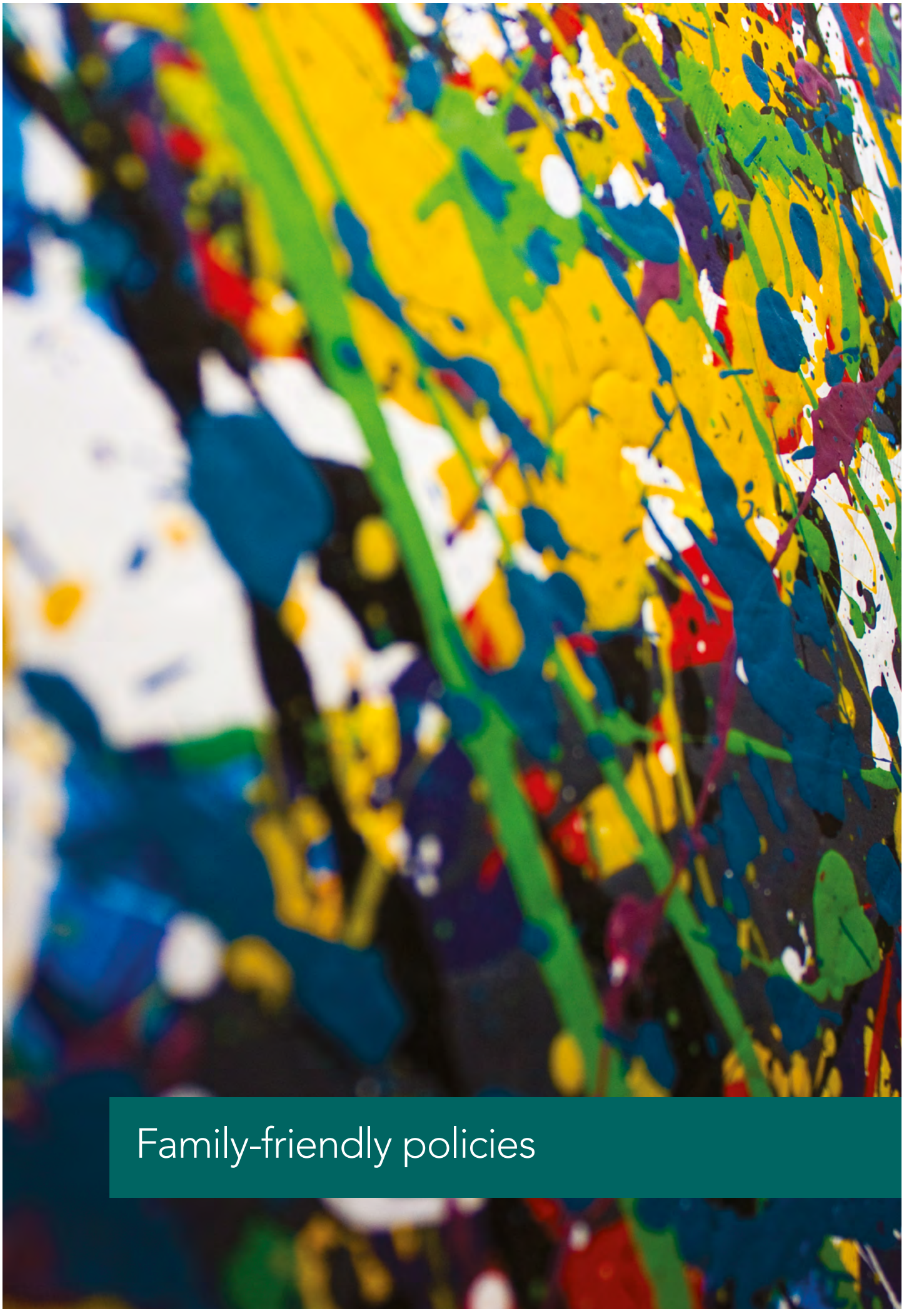
Where practicable, an appeal meeting will be conducted by a manager senior to the individual who conducted the sickness absence meeting.

Depending on the circumstances, an appeal meeting may be a complete rehearing of the matter or a review of the original decision.

The final decision will be confirmed in writing, if possible within one week of the appeal meeting. There will be no further right of appeal.

The date that any dismissal takes effect will not be delayed pending the outcome of an appeal. However, if the appeal is successful, the decision to dismiss will be revoked with no loss of continuity or pay.

Entitlement to any benefit under any company or other medical or health insurance policy will cease in the event of employment being terminated.



Family-friendly policies

Family-friendly policies

FLEXIBLE WORKING

Flexible working is any type of working arrangement that gives some degree of flexibility on how long, where and when an employee works. Tudor Rose is committed to improving the working lives of employees by promoting flexible working practices and policies to support a better work-life balance, provided that the needs of both the company and the employee can be met.

Our policy is to encourage open discussion with employees. If you think that you may benefit from flexible working you are encouraged to speak to your line manager to consider the options available to adjust your working arrangements. Tudor Rose will give due consideration to all flexible working requests made under this policy, however, there is no automatic right to a flexible working arrangement.

To be eligible for flexible working you must:
- Have worked for Tudor Rose continuously for at least 26 weeks at the date of the application for flexible working
- Have not made another formal application to work flexibly during the previous 12-months

MATERNITY LEAVE AND BENEFITS

Information on your statutory entitlements as agreed by the UK government is available from HR or by visiting: www.gov.uk/maternity-leave/overview

PATERNITY LEAVE

If you are a father-to-be or you will be responsible along with the mother for bringing up a child, you could have the right to paternity leave and pay, providing you meet certain conditions. Information on your statutory entitlements as agreed by the UK government is available from HR or by visiting: www.gov.uk/paternityleave

UNPAID PARENTAL LEAVE

Parental leave offers qualifying parents the right to take unpaid time off work to look after their child or to make arrangements for their welfare. It can help parents spend more time with their children and achieve a better balance between work and family commitments.

You have the right to parental leave if you:

- Have been employed by the Company for a year or more.
- Are an 'employee', with a contract of employment (most agency and casual staff don't have the right to parental leave).
- Are a parent named on the child's birth certificate; or
- Are named on the child's adoption certificate; or
- Have legal parental responsibility for a child under five (18 if disabled).

Both parents have the right to parental leave. If you are separated and you don't live with the children, you have the right to parental leave if you have formal parental responsibility for the children.

You can take a total of up to 18 weeks' parental leave for each of your children up until their fifth birthday. If your child is adopted, you can take a total of up to 18 weeks' parental leave until the fifth anniversary of their placement with you or until their 18th birthday, whichever comes first. If your child is disabled (that is, in receipt of disability living allowance) you have the right to take up to 18 weeks' parental leave until their 18th birthday.
We may ask to see evidence of:

- Your responsibility or expected responsibility for the child such as birth certificate, adoption or matching certificate, parental responsibility agreement or court order.
- The child's date of birth or date of adoption placement; and
- If applicable, the child's entitlement to a disability living allowance, armed forces independence allowance or personal independence allowance.

Should you wish to obtain further information, please contact HR.

ADOPTION LEAVE

Subject to eligibility, employees who are adopting newly matched children may be entitled to Adoption Leave. Employees adopting are required, unless this is not reasonably practical, to inform their manager within seven days of being notified that they have been matched for adoption. Upon request, details of eligibility, requirements and statutory payments will be provided by HR.

TIME OFF FOR DEPENDANTS

In times of genuine, unexpected or sudden emergency involving someone who depends upon you, Tudor Rose will be as reasonable and supportive as possible. Employees have the right to take unpaid time off work to deal with such emergencies.

Dependants are your husband, wife or partner, child or parent, or someone living with you as part of your family who might also be considered as depending on you. Others who rely solely on you for help in an emergency may also qualify. An 'emergency' is defined as when someone that depends on you:

- Is ill and needs your help.
- Is involved in an accident or incident.
- Needs you to arrange their care.
- Needs you to deal with an unexpected disruption or breakdown in care, such as a childminder or nurse failing to arrive.
- Goes into labour.

You can also take time off if a dependent dies and you need to make funeral arrangements or attend the funeral.

These rights cover emergencies only. If you know beforehand that you're going to need time off, you should arrange this with your line manager by taking annual leave. You may take a reasonable period of time to deal with an immediate emergency. For example, if your child falls ill you can take time off to deal with their initial needs, such as taking them to a doctor and arranging for their care. Other arrangements will need to be made, if you want to stay off work longer to care for them yourself.

Any time taken off is unpaid and will be deducted from salary, unless it is agreed with your line manager that the time may be made up. You must tell your line manager as soon as possible why you are away from work and how long you expect to be off. If you return to work before you've had the opportunity to contact your manager, you must still tell them why you were absent. Failure to do so may lead to absence being treated as unauthorized. Abuse of this entitlement may constitute a disciplinary matter.

OTHER TIME OFF WORK

In addition to absence due to illness, approved holidays and other family friendly policies, the Company is aware that you may be unable to attend work on other occasions, with good reason.

Compassionate leave
The death of relatives is inevitably a difficult time and the Company will seek to support employees wherever possible. Up to three days leave with pay may be allowed in the event of the death of a close relative. A close relative is defined as husband, wife, mother, father, brother, sister, child, guardian or next of kin.

Family-friendly policies

Public duties
We encourage employees to support the local community and to undertake public duties which may also benefit their development and contribution to the Company. Tudor Rose may with prior agreement provide reasonable unpaid time off for employees who carry out public duties including service as:

- Justice of the Peace
- Her Majesty's Reserve Forces
- Member of a local authority
- Member of a police authority
- Member of any statutory tribunal
- Member of a relevant health body
- Member of the managing or governing body of an educational establishment
- Member of the governing body of a further or higher education corporation
- Member of a school council
- Member of the General Teaching Councils for England and Wales
- Member of the Environment Agency
- Prison independent monitoring boards
- Member of Scottish Water or a Water Customer Consultation Panel.

Jury service
When advised you are required for jury service, you must inform your line manager in writing at the earliest opportunity. The Company reserves the right to appeal against an employee being called for jury service according to business needs at the time. There is no requirement for the Company to make payment of salary or wages during periods when employee's undertake jury service. Employee's serving on a jury must claim the appropriate and maximum possible allowances for their own loss of earnings.

However, provided the employee supplies payroll with a statement of the claim for loss of earnings, the Company will make up the difference between that claim amount and the normal earnings level for the term of the jury service. Employee's claims for travel and subsistence will of course remain theirs and not the Company's.

Should an employee fail to claim or fail to present a copy of the claim statement within one month of the end of the jury service, the Company may deduct from salary the full pay for days absent. Where practical, employees are expected to report for work on days that they are not required for jury service.

Court service
Should an employee be called to give evidence before a court the employee will, subject to providing evidence of being summoned to court, be granted leave of absence during the period of attendance. Those who are prosecuted themselves in court or who attend of their own volition may not be paid for the time absent from work.

What is reasonable time off will be determined by the amount of time required over a period for that public duty and how much time is required for the particular duty in question. The business needs at that time are also a key factor that will need consideration.

Business travel
Business travel is treated as work time and therefore, if it is necessary to travel outside the normal working week (i.e. at weekends or bank holidays), time off in lieu will be given. However, if an employee makes their own choice to travel outside of the working week for other than business reasons, the travel time will not be treated as business-related and time off in lieu shall not normally be given.

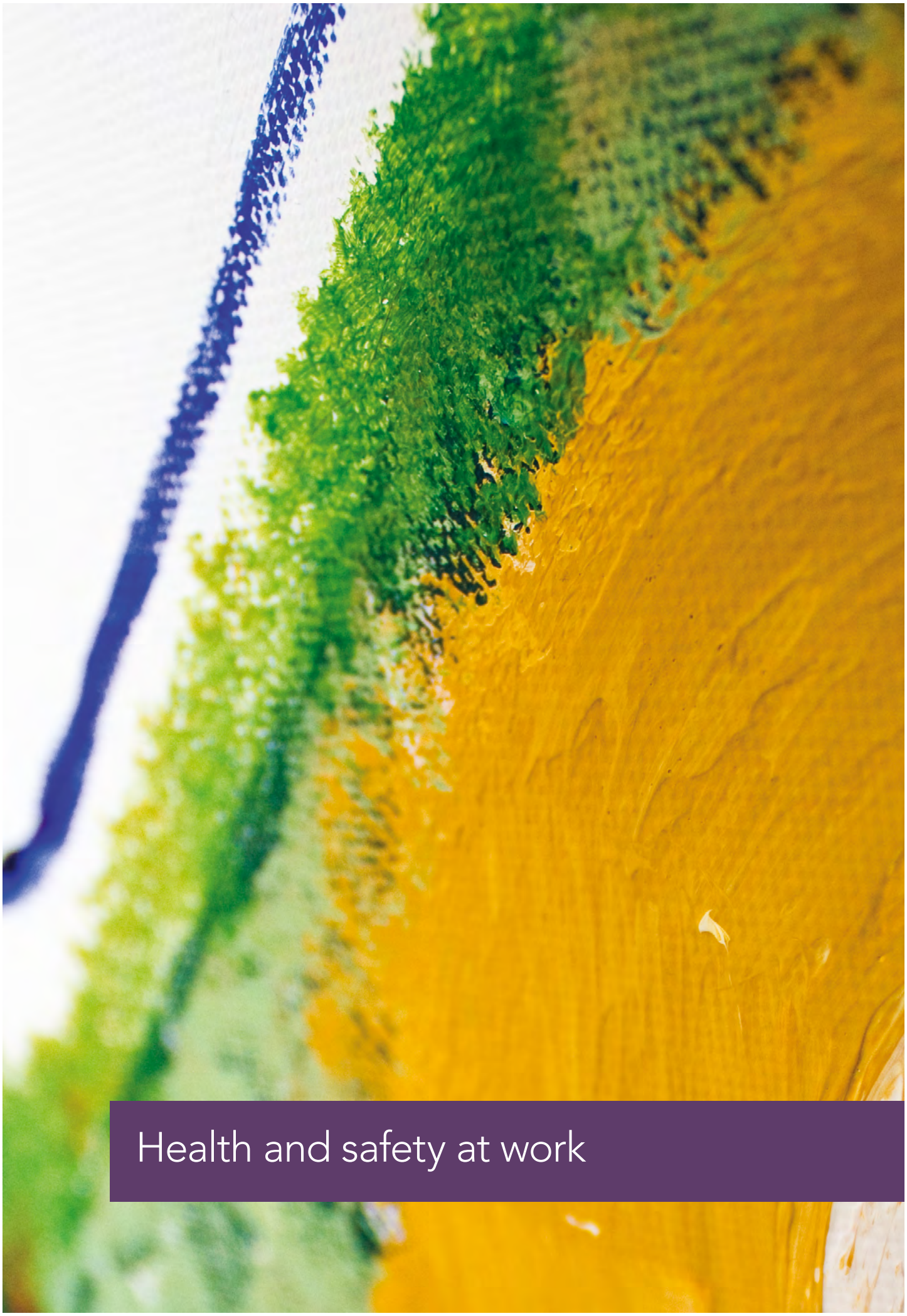
Safety representatives
Accredited safety representatives may be granted reasonable paid time off to attend to duties and undergo necessary training.

Other reasons
Wherever possible, legal, medical (other than maternity where an entitlement to paid time off exists), dental appointments and the like should be taken outside of working hours or holiday booked accordingly.

Family-friendly policies

Employees may, subject to prior approval from their line manager, take time during the working day provided the lost time is made up according to the needs of the business.

In the event that employee is unable to get to work due to weather conditions, time will either be taken as holiday or unpaid depending on the employee's preference. Subject to approval by the line manager, time may also be made up at a later date.



Health and safety at work

Health and safety at work

GENERAL STATEMENT OF POLICY

Our policy is, as far as is reasonably practical:

- To provide and maintain safe and healthy working conditions, equipment and systems of work for all our employees.
- To provide such information, training and supervision as our employees need for this purpose.
- To accept responsibility for the health and safety of other people including visitors and contractors who may be affected by our work.
- To review this policy, and the way in which it is operated, every year and to keep it up to date, particularly as the business changes in nature and size.

Failure to comply with this policy may be treated as misconduct and dealt with under our Disciplinary Procedure. The allocation of duties for safety matters is set out below.

Accountability
All staff share responsibility for achieving safe working conditions. You must take care of your own health and safety and that of others, observe applicable safety rules and follow instructions for the safe use of equipment.

You should report any health and safety concerns immediately to your line manager.You must co-operate with managers on health and safety matters, including the investigation of any incident. Everyone at Tudor Rose is accountable for working safely. However, the following people have specific duties:

Duty	Person(s)
Overall and final accountability for health and safety	Managing director
Person accountable for providing advice on and monitoring all safety related matters	Head of Operations
Person responsible for reporting to the Health & Safety Executive (RIDDOR)	Head of Operations
Person responsible for safety in workplace	Everyone
Induction training	Office manager
Job training	Departmental managers
Person responsible for first aid boxes	Senior first aider
Trained first aiders	As displayed on notices
Trained fire marshals	As displayed on notices

Employees' accountabilities
Each employee is accountable for:

- Cooperating with Tudor Rose's management to achieve a safe and healthy environment
- Taking reasonable care of themselves and of others who might be affected by their acts, or lack of action, at work
- Not interfering with, or misusing any safety device, such as fire extinguishers, alarms/sensors, safety guards, etc. This includes not blocking access to emergency exits or fire extinguishers.

Risk assessments
Any risks identified will be assessed and recorded. This will include general risks and specific risks such as manual handling and display screen equipment. Records of all assessments are kept in the risk assessment folder. assessments will be reviewed periodically when there is a significant change or when there is reason to suspect that the last assessment is no longer valid.

As a result of assessments, reasonable and practical action will be taken to minimise risks to health and safety. These actions may include changes to equipment or safe systems of work.

Health and safety at work

Incidents
All incidents, near-misses and accidents will be recorded and investigated and the appropriate action taken to overcome the root causes. All accidents are to be recorded in the Accident Record book and completed slips must be passed immediately to the Head of Operations. The Accident Record book is contained in the first aid box which is stored in the kitchen area. The Head of Operations will be responsible for reporting to the Health and Safety Executive any incidents which must be notified.

First aid
A first aid box is located in the kitchen. The contents of the first aid box should be used only with a Company first aider present. Every person using materials from the first aid boxes or requiring the attention of a first aider must record any injury in the Accident Record book.

Fire safety
Smoking is forbidden throughout the entire premises and immediate vicinity of external exits. Fire doors within the building must be kept shut at all times.

Fire procedures are posted on notice boards and employees must make themselves aware of these. New joiners will receive copies as part of their induction. Fire extinguishers will be inspected every year. The fire alarms system will be serviced every year.

If you hear a fire alarm, leave the building immediately by the nearest fire exit and go to the fire assembly point. Do not stop to collect belongings. Fire wardens will assist in the evacuation of the building and you must follow their instructions. Do not re-enter the building until told to do so.

If you discover a fire do not attempt to tackle it unless it is safe and you have been trained or feel competent to do so. You should operate the nearest fire alarm and, if you have sufficient time, call reception and report the location of the fire.

Nominated individuals will be trained in the correct use of fire extinguishers.

You should notify your manager if there is anything (for example, impaired mobility) that might impede your evacuation in the event of a fire. A personal evacuation plan will be drawn up and brought to the attention of the relevant fire wardens and colleagues working in your vicinity.

Contractors and visitors
No visitor or work contractor will be allowed onto the premises unless that person has a nominated host who is accountable for their safety whilst on site.

Before a contractor commences any work on the premises, the Head of Operations will agree with the contractor the safe systems of work to minimise the risks to the health and safety of Tudor Rose's employees, contractors' employees and any others who might be affected by the work. The Head of Operations will also check that the agreed safe system of work is being adhered to.

Non-standard work
Non-standard work, such as hot work, electrical work or working at height will be subject to assessment before work commences. Risk control measures will be implemented, and the Head of Operations will check, and if necessary periodically recheck that these measures are being followed. Tudor Rose regards this system for non-standard work as being applicable to work by contractors and/or Tudor Rose employees. The Head of Operations must be advised in advance of all such work.

Substances hazardous to health
Substances hazardous to health will be assessed and a record of the assessment kept and made available to employees where necessary. The assessment shall be carried out before the substance arrives on site.

Safe systems shall be implemented to minimise risk to health and safety from these substances. Training on risks and methods of their avoidance will be provided where appropriate.

Health and safety at work

Housekeeping
All waste material will be cleared away. Waste material or any combustible material must not be allowed to build up in any area. All gangways will be kept clear. Emergency exits and access to fire extinguishers shall be kept clear at all times.

Electrical equipment
Electrical repairs and changes to equipment must only be carried out by a qualified electrician. All portable electrical equipment will be checked according to the schedule of inspection. All portable appliances are checked annually. Fixed three-phase electrical equipment will be checked every five years. If you suspect any electrical appliance or equipment to be defective you must immediately report it to the Operations Team and warn other employees not to touch it.

Never use an adapter in a 13-amp socket. Never connect more than one four-gang extension lead into a 13 amp socket. If electrical sockets are in the wrong place or are not available inform the office manager so that a new socket can be cabled. Never trail electrical leads across gangways. Do not bring electrical equipment into the office unless it has been passed as safe by the Head of Operations. Switch off all appliances, equipment and lights when they are left unattended or when you leave at night.

Manual Handling
All employees are to ensure that when lifting and moving items they do so only if they have been trained in line with manual handling guidelines. Failing that, assistance must be sought from the Head of Operations or reception prior to lifting heavy or awkward objects.

Office safety and display screen equipment
All cables (for example desk light leads, telephone cables, portable heater cables and computers) must not be allowed to trail or present a risk of tripping. Do not leave objects on the floor where they might present a risk of tripping Report any issues such as rough or sharp corners, worn carpet or any other risks you see to the Head of Operations.

If you use a computer screen or other display screen equipment (DSE) habitually as a significant part of your work:
- You should try and organise your activity so that you take frequent short breaks from looking at the screen.
- You are entitled to a workstation assessment.
- You are entitled to an eyesight test by an optician at our expense.

You should contact your line manager to request a workstation assessment or an eye test. Eye tests should be repeated at regular intervals as advised by the optician, usually every two years. However, if you develop eye problems which may be caused by DSE work (such as headaches, eyestrain, or difficulty focusing) you can request a further eye test at any time.
We will not normally pay for glasses or contact lenses, unless your vision cannot be corrected by normal glasses or contact lenses and you need special glasses designed for the display screen distance. In such cases we will pay the cost of basic corrective appliances only.

Personal protective equipment (PPE)
PPE will be provided to control risks to health and safety. However, it shall only be provided and used when other control methods are impractical. Employees must immediately report loss or defects in PPE to their manager.

Business-related travel
Employees using their own or any other vehicle including hire vehicles (whether arranged by the Company or not) for business related travel must ensure they hold a valid driving licence, are competent and able to drive, that their vehicles are roadworthy, holding a current MOT certificate and that they are adequately insured for business-related travel for themselves and passengers. Drivers must take adequate breaks whilst driving – a break must be taken not less than every two hours or at any stage if feeling fatigued.

Health and safety at work

Drivers must follow road traffic laws and the highway code. Any fines, endorsements or criminal actions are the responsibility of the driver or person involved and the Company is not liable for any such matters or responsible for payment of penalties.

Smoking in a vehicle, when used on Company business is considered to be a gross misconduct offence. Staff members are required to report the loss of or damage to their vehicle or any hire vehicle to the police in the first instance and then to the Company.

Drivers must drive within the law, including:-

- Ensuring that a valid road fund licence is displayed.
- Ensuring that traffic signs and statutory speed limits are observed at all times.
- Ensuring that prohibited areas of the road are avoided such as bus or tram lanes.
- Ensuring that the vehicle is sensibly parked and not in breach of any regulations.
- Ensuring that they drive with reasonable care, skill, attention and consideration for other road users.
- Ensuring that mobile phones are not used whilst driving a Company or client vehicle.

The Company does not condone the use mobile phones or any associated 'Bluetooth Technology' whilst driving. With the safety of employees and others in mind, the use of any other devices whilst driving is prohibited.

Under no circumstances shall employees drive whilst under the influence of alcohol, other substances or when unfit to do so for other reasons such as illness.

Consultation
Tudor Rose promotes and encourages consultation with employees on health and safety matters. Please feel free to raise any matters with the Head of Operations or a Director.

SUBSTANCE MISUSE POLICY

The Company has a duty of care and is committed to providing a safe working environment for all its employees. This includes ensuring employees are able to perform their tasks in a safe and professional manner.

Being under the influence of drugs (including illegal or prescribed drugs or any other mood affecting substances) when attending work, or taking drugs in the workplace, is strictly against company health and safety rules. This also applies to intoxication or unacceptable behaviour due to alcohol consumption. Such cases may be dealt with as a disciplinary matter and could potentially constitute gross misconduct.

Conduct
We expect you to demonstrate responsible behaviour at work, work-related functions and work-related social events and to act in a way that will not have a detrimental effect on our reputation. If you entertain clients or represent us at external events where alcohol is served, you are considered to be "at work" regardless of whether you do so outside normal working hours. Consequently, we will expect you to remain professional and fit for work at all times.

Managers should act to prevent excessive consumption of alcohol by any member of staff and should take steps to deal with any unacceptable conduct. Any such behaviour may lead to disciplinary action.

Misuse of alcohol and drugs can lead to reduced levels of attendance, reduced efficiency and performance, impaired judgement and decision making and increased health and safety risks for you and other people. Irresponsible behaviour or the commission of offences resulting from the misuse of alcohol or drugs may damage our reputation and, as a result, our business.

You are expected to arrive at work fit to carry out your job and to be able to perform your duties safely

without any limitations due to the use or after effects of alcohol or drugs (whether prescribed, over the counter or illegal).

Bringing illegal or controlled drugs or alcohol (other than for approved events or entertainment in the case of alcohol) onto the premises may be dealt with as such through the disciplinary procedures.

Substances and Driving
You must comply with drink-driving laws at all times. Conviction of a drink-driving offence may harm our reputation and, if your job requires you to drive, you may be unable to continue to do your job.
If you are prescribed medication you must seek advice from your GP or pharmacist about the possible effect on your ability to carry out your job and whether your duties should be modified or you should be temporarily reassigned to a different role.

Support
Where possible, Tudor Rose is firmly committed to the health and wellbeing of employees who may have dependency issues.

We therefore encourage employees to speak openly and confidentially of such issues either to the HR manager, their line manager or to a director. Tudor Rose will, wherever appropriate, be supportive and will work positively with those who take and follow medical advice.

If you notice a change in a colleague's pattern of behaviour you should encourage them to seek assistance through their manager, Head of Operations or director. If they will not seek help themselves you should draw the matter to the attention of your manager. You should not attempt to cover up for a colleague whose work or behaviour is suffering as a result of an alcohol or drug-related problem.

If your manager has reason to believe that you are suffering the effects of alcohol or drugs misuse, they will invite you to an investigatory interview. The purpose of the interview is to:

- discuss the reason for the investigation and seek your views on, for example, the deterioration of your work performance and/or behaviour; and
- where appropriate, offer to refer you to external services for medical and/or specialist advice.

If you arrive at work and a manager reasonably believes you are under the influence of alcohol or drugs, they shall immediately contact Human Resources in order that an investigation can be undertaken.

The Company may ask for your consent to approach your GP for advice. A report will be sent to your manager who will then reassess the reasons for their investigatory meeting with you and decide on the way forward.

If, as the result of the meeting or investigation, your manager continues to believe that you are suffering the effects of alcohol or drugs misuse and you refuse to engage with appropriate treatment providers the matter may be dealt with under our Disciplinary Procedure.

We aim to ensure that the confidentiality of any member of staff experiencing alcohol or drug-related problems is maintained appropriately. However, it needs to be recognised that, in supporting staff, some degree of information sharing is likely to be necessary.

If you agree to undertake appropriate treatment and/or rehabilitation for an acknowledged alcohol or drug-related problem, we may decide to suspend any ongoing disciplinary action against you for related misconduct or poor performance, pending the outcome of the treatment.

Our intention is to support all staff with alcohol or drug-related problems to regain good health. Depending on the progress made on the course of treatment, any disciplinary action may be suspended for a specified period, discontinued or restarted at any time as we see fit.

DISCIPLINARY PROCEDURE

Performance and conduct

Performance and conduct

Introduction
The Company reasonably requires and expects good standards of discipline and conduct from its employees together with satisfactory standards of work. The purpose of the disciplinary procedure is to ensure that concerns over employees' conduct or performance are handled in a fair, consistent and timely manner with the intention of bringing about an improvement, and to protect the proper operation of the Company's business and the health and safety of its employees.

This procedure may be reviewed and updated from time to time. any amendments will be notified to employees in writing, following consultation and/or notice where appropriate.

Rules and application
The following are some examples (but not an exhaustive list) of types of misconduct that will normally be addressed through implementation of the Company's Disciplinary Procedure:

- Breaches of company policies and procedures;
- Minor breaches of your contract;
- Damage to, or unauthorised use of, our property including ICT systems;
- Poor timekeeping;
- Time wasting;
- Unauthorised absence from work;
- Refusal to follow instructions;
- Excessive use of our telephones for personal calls;
- Excessive personal e-mail or internet usage;
- Obscene language or other offensive behaviour;
- Negligence in the performance of your duties;
- Smoking in no-smoking areas; or
- Excessive or unauthorised breaks including smoking breaks
- Falsifying of records or failure to fulfil reasonable requests to provide information

The following are some examples (but not an exhaustive list) of types of gross misconduct which will normally be dealt with through the Company's Disciplinary Procedure.

- Inappropriate behaviour;
- Discrimination on any grounds including those detailed in the Company's Equal Opportunities Policy : e.g. race, sex, sexual orientation, religion, disability, age, marital status or ethnic origin;
- Theft, or unauthorised removal of our property or the property of a colleague, contractor, customer or member of the public;
- Fraud, forgery or other dishonesty, including fabrication of expense claims and time sheets;
- Physical violence or bullying;
- Deliberate and serious damage to property;
- Serious misuse of our property or name;
- Deliberately accessing internet sites containing pornographic, offensive or obscene material;
- Repeated or serious failure to obey instructions, or any other serious act of insubordination;
- Bringing the organisation into serious disrepute;
- Serious incapability at work brought on by alcohol or illegal drugs;
- Causing loss, damage or injury through serious negligence;
- Serious breach of health and safety rules;
- Unauthorised use or disclosure of confidential information or failure to ensure that confidential information in your possession is kept secure;
- Accepting or offering a bribe or other secret payment;
- Conviction for a criminal offence that in our opinion may affect our reputation or our relationships with our staff, customers or the public, or otherwise affects your suitability to continue to work for us;
- Possession, use, supply or attempted supply of illegal drugs;
- Serious neglect of duties, or a serious or deliberate breach of your contract or operating procedures;
- Knowing breach of statutory rules affecting your work;
- Unauthorised use, processing or disclosure of personal data contrary to our Data Protection Policy;
- Refusal to disclose any of the information required by your employment or any other information that

may have a bearing on the performance of your duties;
- Giving false information as to qualifications or entitlement to work (including immigration status) in order to gain employment or other benefits;
- Knowingly taking parental, paternity or adoption leave when not eligible to do so or for a purpose other than supporting a child;
- Making a disclosure of false or misleading information under our Whistleblowing Policy maliciously, for personal gain, or otherwise in bad faith;
- Making untrue allegations in bad faith against a colleague;
- Victimising a colleague who has raised concerns, made a complaint or given evidence or information under our Anti-corruption and bribery policy, Grievance Procedure, Disciplinary Procedure or otherwise;
- Serious misuse of our information technology systems (including misuse of developed or licensed software, use of unauthorised software and misuse of e-mail and the internet) contrary to our Information and Communications Systems Policy;
- Undertaking unauthorised paid or unpaid employment during your working hours;
- Unauthorised entry into an area of the premises to which access is prohibited; or
- Serious misuse of our information technology systems (including misuse of developed or licensed software, use of unauthorised software and misuse of e-mail and the internet) contrary to our Information and Communications Systems Policy;

The disciplinary procedure does not apply to:
- Termination of employment during or at the end of a new employee's probationary period (including any extended probationary period)
- Termination of employment by reason of redundancy
- Termination of employment by mutual consent.

Where time limits are referred to in this procedure, they may be shortened or extended at the discretion of the Company.

Disciplinary matters will be handled with as high a degree of confidentiality as possible. Records of disciplinary matters will be kept confidentially in the employee's HR file. Copies of meeting notes will be provided to the employee, although the Company reserves the right to withhold certain information (e.g. to protect a witness).

The Company reserves the right to suspend an employee from work on full pay, normally for no more than five working days, while a disciplinary offence is investigated. Employees will be advised if the suspension is likely to last longer than five working days. Suspension on full pay is not regarded by the Company as disciplinary action.

Minor disciplinary offences may be handled informally in the first instance, through discussion/ counselling and informal warning(s). Where an informal approach fails to bring about the desired improvement, or where the offence is more serious, the formal disciplinary procedure will be followed.

Formal disciplinary procedure
There will be a careful investigation of any alleged offence before any formal disciplinary meeting or disciplinary action is taken against an employee. If the Company concludes that there are reasonable grounds to believe that an employee might have committed an act of misconduct, they will be asked to attend a disciplinary hearing with either their line manager or another suitable manager. In the case of misconduct issues, the disciplinary hearing will, wherever possible, be conducted by someone other than the person carrying out the initial investigation.

In the event of a formal disciplinary hearing, the Company will:

- Give the employee a minimum of 24 hours' advance notice of the meeting in writing, making it clear that the meeting is being held under the Company's formal disciplinary procedure and detailing the alleged misconduct or performance issue.
- Remind the employee of their right to be accompanied by a colleague or trade union representative at the meeting
- Give the employee, at the meeting, a full explanation of the case against them.
- Give the employee, at the meeting, every opportunity to challenge allegations against them, state

their case and put forward an explanation of their conduct or performance and any mitigating factors.
- Take all relevant factors into account before reaching decisions about any disciplinary action.
- When reasonable, confirm the outcome of the disciplinary hearing in writing within five working days, specifying the reason for any disciplinary action, the standards of conduct or work performance expected, details of any objectives and timescales agreed, the consequence of failing to achieve acceptable improvements, and the period after which any warning will be disregarded for disciplinary purposes.
- Remind the employee of their right to appeal against any disciplinary action.
- Maintain appropriate records on the employee's personal file.

The Company will consider all reasonable adjustments to ensure that meetings can take place. If an employee fails to attend a disciplinary meeting without giving adequate reasons, a further written meeting invite will be issued. If the employee then further fails to attend, the Company will, as appropriate, conduct the meeting in the absence of the employee and make any decision based upon the information available at that time.

Employees may be accompanied at any disciplinary meeting by a fellow worker, a trade union representative, or an official employed by a trade union.The stages of the formal disciplinary procedure shall be as follows:

Stage 1 – first written warning
If after a formal disciplinary meeting the employee's conduct does not meet acceptable standards they will usually be given a written warning. This will set out the nature of the misconduct or performance issue and the standard of conduct expected, detailing any timescales for review. The written warning will confirm that a final written warning may be considered appropriate if there is no sustained satisfactory improvement, or any further misconduct or gross misconduct is committed. A record of the warning will be kept on file, and will be disregarded for disciplinary purposes after a specified period of up to 12 months subject to satisfactory conduct/performance.

Stage 2 – final written warning
If after a formal disciplinary meeting the employee's conduct continues to be unacceptable during the currency of a prior written warning, a final written warning may be issued to the employee. This will set out the nature of the misconduct issue and the standard of conduct expected, detailing any timescales for review.

It will also warn that failure to improve might lead to dismissal and will refer to the right of appeal. A copy of this written warning will be kept on file and will be disregarded for disciplinary purposes after a specified period of up to 12 months subject to satisfactory conduct.

A final written warning may be issued as a 'first and final' warning where the conduct issue is sufficiently serious, thereby omitting stage 1 from the process.

Stage 3 – dismissal (or other penalty)
If after a formal disciplinary meeting the employee's conduct continues to not meet acceptable standards, if there is still a failure to improve, or where the conduct is sufficiently serious, the final step in the procedure may be dismissal or some other action short of dismissal such as suspension or transfer.

The employee will be provided, as soon as reasonably practicable, with written reasons for dismissal, the date on which the employment will terminate, and details of their right of appeal. The decision to dismiss will be confirmed in writing. In cases of gross misconduct, the employee will usually be dismissed without notice or pay in lieu of notice. In exceptional circumstances, or if there are genuine mitigating circumstances, alternative disciplinary action may be taken.

Summary

Performance and conduct

If a warning does not bring about the desired level of improvement in the employee's conduct, or for repeated minor offences, then the employee will normally progress to the next stage of the formal procedure. The Company reserves the right to implement the procedure at any stage, taking into account the nature and severity of the disciplinary offence. For example, where conduct is sufficiently serious to justify only a single written warning but insufficiently serious to justify dismissal, an employee may be given a final written warning for a first offence. Employees will not be dismissed for a first disciplinary offence (except for gross misconduct).

Where appropriate, the Company reserves the right to impose disciplinary penalties as an alternative to dismissal. Such penalties may include, for example:, transfer, loss of seniority, or loss of pay/ benefits or other terms and conditions of employment.

Decisions of dismissal will normally only be approved by a director or with the managing director's authority, prior to being communicated to the employee.

The right to appeal exists for any decision arising from a disciplinary action, in line with the appeals procedures.

Gross Misconduct
In the event that an employee commits an act of gross misconduct, the Company is entitled to summarily terminate the employee's contract of employment without notice or pay in lieu of notice.

In circumstances where an employee has allegedly committed gross misconduct, the Company will normally investigate the matter and then write to the employee, inviting them to a formal disciplinary meeting, setting out clearly the allegation made along with any evidence. The Company will ensure that any letter makes it clear that the matter might be classed as gross misconduct, which could potentially result in summary dismissal. meetings will normally be carried out by a senior manager or director. The employee may be accompanied at any meeting which is convened.

Decisions of dismissal will normally only be approved by a director or with the managing director's authority, prior to being communicated to the employee.

The right to appeal exists in relation to any decision arising from a disciplinary meeting, in line with the appeals procedure.

Employees dismissed for gross misconduct will forfeit any right to commission, bonuses or any other remuneration or benefit that might have become due after dismissal.

Appeal
An employee has the right to appeal against a disciplinary decision. The request for all appeals must be put in writing within five working days of receiving the original decision and should set out the grounds of appeal. Appeals should be addressed to a director.

A meeting will normally be arranged with the employees within five days of receiving the request for an appeal.

The appeal meeting will, wherever possible, be chaired by a different manager to the one involved in the previous procedures leading to a decision and, wherever possible, by a manger of greater seniority.

The employee has the right to be accompanied at any appeal meeting. The outcome of the appeal meeting shall be communicated to the employee in writing normally within five working days of the appeal hearing. Where further time is required to consider the appeal, the Company will write to the employee to notify them. Decisions made up at this point are final in terms of the appeal process.

GRIEVANCE PROCEDURE

Performance and conduct

The grievance procedure enables the Company to ensure that any problems, complaints or concerns raised by its employees are dealt with in a fair, timely and consistent manner. If an employee has a grievance or complaint regarding their work, working conditions, pay and benefits, working hours, or treatment by colleagues (including issues of harassment and bullying), or if they are concerned about their health and safety or a breach of statutory employment rights or any other issue affecting their employment, it should be raised in line with this procedure.

Informal procedure
Employees should, where possible, first discuss the grievance or complaint with their immediate line manager on an informal basis. The line manager will discuss any concerns with the employee and attempt to resolve the matter within a reasonable timescale. Where it is not possible for the employee to talk to their immediate manager, or if the grievance concerns him or her, the employee should instead talk to the next most senior person or to HR

Where the informal procedure is used, both parties should keep a written record of the meeting including what was discussed and any proposed action

If the grievance has not been resolved or cannot be settled informally, the matter should be dealt with according to the formal grievance procedure.

Standard Formal Grievance Procedure – Stage 1 - Notification
The aggrieved employee must first send a written statement detailing the nature of the alleged grievance to their line manager. Where it is the line manager who is the subject of the grievance, the employee should instead send the written statement to another manager of equal or greater seniority where possible or otherwise to HR.

Stage 2 – investigation and decision
Upon receiving the written statement, the manager will send a written acknowledgement of the grievance and invite the employee to a meeting in order to discuss the issue as soon as is reasonably practicable (the 'initial meeting'), usually no longer than three working days after receipt of the grievance. The initial meeting shall be scheduled at a reasonable time and place, usually during normal working hours

A written note of the initial meeting, and if relevant a post-investigation meeting, must be made by the investigating manager.

The employee has the right to be accompanied at any meeting concerning the grievance. Employees may be accompanied at any disciplinary meeting by a fellow worker, a trade union representative, or an official employed by a trade union. The investigating manager will be accompanied by someone appropriate, to take notes.

After the initial meeting the investigating manager will conduct a full investigation into the grievance in order to establish the facts surrounding it

Following the investigation, and within a reasonable time (usually no longer than five working days) the investigating manager shall:
- Where it is deemed necessary, convene a further meeting with the employee in order to discuss the outcome of the investigation and any action that is to be taken
- Send to the employee and their representative a full written response to the grievance, detailing the outcome of the investigation and any action that is to be taken
- Inform the employee in writing of their right appeal if the decision goes against them.

Stage 3 - Appeal
An employee has the right to appeal against a grievance decision. The request for all appeals must be put in writing within five working days of receiving the original decision and should set out the grounds of appeal. Appeals should be addressed to a director

A meeting will be normally be arranged with the employee within five days of receiving the request

for an appeal. The appeal meeting will, wherever possible, be chaired by a different manager to the one involved in the previous procedures leading to a decision and, wherever possible, by a manager of greater seniority.

The employee has the right to be accompanied by a colleague or trade union representative, at any appeal meeting

The outcome of the appeal meeting shall be communicated to the employee in writing normally within five working days of the appeal hearing. Where further time is required to consider the appeal, the Company will write to the employee to notify them. decisions made at this point are final in terms of the appeal process.

Modified formal procedure
The two-stage modified procedure will apply where:
- The aggrieved employee is no longer employed by the Company.
- Both the ex-employee and the Company agree that it should apply, and
- The Company was unaware of the grievance or the formal procedure was either not started or started but not finished at the time that the ex-employee left employment with the Company.

The modified procedure may also apply where it is not reasonably practicable for one of the parties to adhere to the standard procedure and that this is agreed to in writing.

Stage 1 – written statement
The ex-employee must send a written statement detailing the grievance and the basis for it to the Company, marked for the attention of the managing director.

Stage 2 – written response
The Company will respond in writing to the ex-employee, addressing all points raised in the grievance letter.

Confidentiality
Grievances will be handled with as high a degree of confidentiality as is practicable.

Confidential records of the grievance will be kept in the employee's HR file in accordance with data protection legislation. Copies of meeting notes will be provided to the employee, although the Company reserves the right to withhold certain information (eg to protect a witness).

CAPABILITY PROCEDURE

The primary aim of this procedure is to provide a framework within which managers can work with employees to maintain satisfactory performance standards and to encourage improvement where necessary.

It is our policy to ensure that concerns over performance are dealt with fairly and that steps are taken to establish the facts and to give employees the opportunity to respond at a hearing before any formal action is taken.

This policy does not apply to cases involving genuine sickness absence, proposed redundancies or misconduct. In those cases reference should be made to the appropriate policy or procedure in the Staff Handbook.

This procedure applies to all employees regardless of length of service. It does not apply to agency workers or self-employed contractors.

This procedure does not form part of any employee's contract of employment and it may be amended at any time.

Identifying Performance Issues

Performance and conduct

In the first instance, performance issues should normally be dealt with informally between you and your line manager as part of day-to-day management. Where appropriate, a note of any such informal discussions may be placed on your personnel file but will be ignored for the purposes of any future capability hearings. The formal procedure should be used for more serious cases, or in any case where an earlier informal discussion has not resulted in a satisfactory improvement. Informal discussions may help:

- Clarify the required standards.
- Identify areas of concern.
- Establish the likely causes of poor performance and identify any training needs; and/or
- Set targets for improvement and a time-scale for review.

Employees will not normally be dismissed for performance reasons without previous warnings. However, in serious cases of gross negligence, or in any case involving an employee who has not yet completed their probationary period, dismissal without previous warnings may be appropriate.

If we have concerns about your performance, we will undertake an assessment to decide if there are grounds for taking formal action under this procedure. The procedure involved will depend on the circumstances but may involve reviewing your personnel file including any appraisal records, gathering any relevant documents, monitoring your work and, if appropriate, interviewing you and/or other individuals confidentially regarding your work.

Disabilities
Consideration will be given to whether poor performance may be related to a disability and, if so, whether there are reasonable adjustments that could be made to your working arrangements, including changing your duties or providing additional equipment or training. We may also consider making adjustments to this procedure in appropriate cases.

If you wish to discuss this or inform us of any medical condition you consider relevant, you should contact your line manager.

Confidentiality
Our aim is to deal with performance matters sensitively and with due respect for the privacy of any individuals involved. All employees must treat as confidential any information communicated to them in connection with a matter which is subject to this capability procedure.

You, and anyone accompanying you (including witnesses), must not make electronic recordings of any meetings or hearings conducted under this procedure.

You will normally be told the names of any witnesses whose evidence is relevant to your capability hearing, unless we believe that a witness's identity should remain confidential.

Notification of a Capability Hearing
If we consider that there are grounds for taking formal action over alleged poor performance, you will be required to attend a capability hearing.

We will notify you in writing of our concerns over your performance, the reasons for those concerns, and the likely outcome if we decide after the hearing that your performance has been unsatisfactory. We will also include the following where appropriate:

- A summary of relevant information gathered as part of any investigation.
- A copy of any relevant documents which will be used at the capability hearing.
- A copy of any relevant witness statements, except where a witness's identity is to be kept confidential, in which case we will give you as much information as possible while maintaining confidentiality.

We will give you written notice of the date, time and place of the capability hearing. The hearing will be

held as soon as reasonably practicable, but you will be given a reasonable amount of time to prepare your case based on the information we have given you.

Right to be Accompanied at Hearings
You may bring a companion to any capability hearing or appeal hearing under this procedure. The companion may be either a trade union representative or a colleague. You must tell the manager conducting the hearing who your chosen companion is, in good time before the hearing.

A companion is allowed reasonable time off from duties without loss of pay but no-one is obliged to act as a companion if they do not wish to do so.

If your companion is unavailable at the time a hearing is scheduled and will not be available for more than five working days we may require you to choose someone else.

We may, at our discretion, allow you to bring a companion who is not a colleague or union representative (for example, a member of your family) where this will help overcome a particular difficulty caused by a disability, or where you have difficulty understanding English.

Procedure at Capability Hearings
If you or your companion cannot attend the hearing you should inform us immediately and we will usually arrange an alternative time. You must make every effort to attend the hearing, and failure to attend without good reason may be treated as misconduct. If you fail to attend without good reason, or are persistently unable to do so (for example, for health reasons), we may have to take a decision based on the available evidence including any written representations you have made.

The hearing will normally be held by your line manager. You may bring a companion with you to the hearing. Your companion may make representations, ask questions, and sum up your case, but will not be allowed to answer questions on your behalf. You may confer privately with your companion at any time during the hearing.

You may ask relevant witnesses to appear at the hearing, provided you give us sufficient advance notice to arrange their attendance. You will be given the opportunity to respond to any information given by a witness.

The aims of a capability hearing will usually include:

- Setting out the required standards that we believe you may have failed to meet, and going through any relevant evidence that we have gathered.
- Allowing you to ask questions, present evidence, call witnesses, respond to evidence and make representations.
- Establishing the likely causes of poor performance including any reasons why any measures taken so far have not led to the required improvement.
- Identifying whether there are further measures, such as additional training or supervision, which may improve performance.
- Where appropriate, discussing targets for improvement and a time-scale for review.
- If dismissal is a possibility, establishing whether there is any likelihood of a significant improvement being made within a reasonable time and whether there is any practical alternative to dismissal, such as redeployment.

A hearing may be adjourned if we need to gather any further information or give consideration to matters discussed at the hearing. You will be given a reasonable opportunity to consider any new information obtained before the hearing is reconvened.

We will inform you in writing of our decision and our reasons for it, usually within one week of the capability hearing. Where possible we will also explain this information to you in person.

Stage 1 Hearing – First Written Warning

Performance and conduct

Following a Stage 1 capability hearing, if we decide that your performance is unsatisfactory, we will give you a first written warning, setting out:

- The areas in which you have not met the required performance standards.
- Targets for improvement.
- Any measures, such as additional training or supervision, which will be taken with a view to improving performance.
- A period for review.
- The consequences of failing to improve within the review period, or of further unsatisfactory performance.

A first written warning may be authorised by a Director.

The warning will normally remain active for six months. After the active period the warning will remain permanently on your personnel file but will be disregarded in deciding the outcome of any future capability proceedings.

Your performance will be monitored during the review period and we will write to inform you of the outcome:

- If your line manager is satisfied with your performance, no further action will be taken.
- If your line manager is not satisfied, the matter may be progressed to a Stage 2 capability hearing; or
- If the manager feels that there has been a substantial but insufficient improvement, the review period may be extended.

Stage 2 Hearing: Final Written Warning
If your performance does not improve within the review period set out in a first written warning, or if there is further evidence of poor performance while your first written warning is still active, we may decide to hold a Stage 2 capability hearing. We will send you written notification.

Following a Stage 2 capability hearing, if we decide that your performance is unsatisfactory, we will give you a final written warning, setting out:

- The areas in which you have not met the required performance standards.
- Targets for improvement.
- Any measures, such as additional training or supervision, which will be taken with a view to improving performance.
- A period for review; and
- The consequences of failing to improve within the review period, or of further unsatisfactory performance.

A final written warning may be authorised by a Director.

A final written warning will normally remain active for 12 months. After the active period, the warning will remain permanently on your personnel file but will be disregarded in deciding the outcome of future capability proceedings.

Your performance will be monitored during the review period and we will write to inform you of the outcome:

- If your line manager is satisfied with your performance, no further action will be taken;
- If your line manager is not satisfied, the matter may be progressed to a Stage 3 capability hearing; or
- If the manager feels that there has been a substantial but insufficient improvement, the review period may be extended.

Stage 3 Hearing: Dismissal or Redeployment

Performance and conduct

We may decide to hold a Stage 3 capability hearing if we have reason to believe:
- Your performance has not improved sufficiently within the review period set out in a final written warning;
- Your performance is unsatisfactory while a final written warning is still active; or
- Your performance has been grossly negligent such as to warrant dismissal without the need for a final written warning.

We will send you written notification of the hearing.

Following the hearing, if we find that your performance is unsatisfactory, we may consider a range of options including:
- Dismissing you.
- Redeploying you into another suitable job at the same grade.
- Extending an active final written warning and setting a further review period (in exceptional cases where we believe a substantial improvement is likely within the review period).
- Giving a final written warning (where no final written warning is currently active).

The decision may be authorised by a Director.

Dismissal will normally be with full notice or payment in lieu of notice, unless your performance has been so negligent as to amount to gross misconduct, in which case we may dismiss you without notice or any pay in lieu.

Appeals Against Action for Poor Performance
If you feel that a decision about poor performance under this procedure is wrong or unjust you should appeal in writing, stating your full grounds of appeal, to a Director within one week of the date on which you were informed in writing of the decision.

If you are appealing against dismissal, the date on which dismissal takes effect will not be delayed pending the outcome of the appeal. However, if your appeal is successful you will be reinstated with no loss of continuity or pay.

If you raise any new matters in your appeal, we may need to carry out further investigation. If any new information comes to light we will provide you with a summary including, where appropriate, copies of additional relevant documents and witness statements. You will have a reasonable opportunity to consider this information before the hearing.

We will give you written notice of the date, time and place of the appeal hearing. This will normally be two to seven days after you receive the written notice.

The appeal hearing may be a complete re-hearing of the matter or it may be a review of the fairness of the original decision in the light of the procedure that was followed and any new information that may have come to light. This will be at our discretion depending on the circumstances of your case. In any event the appeal will be dealt with as impartially as possible.

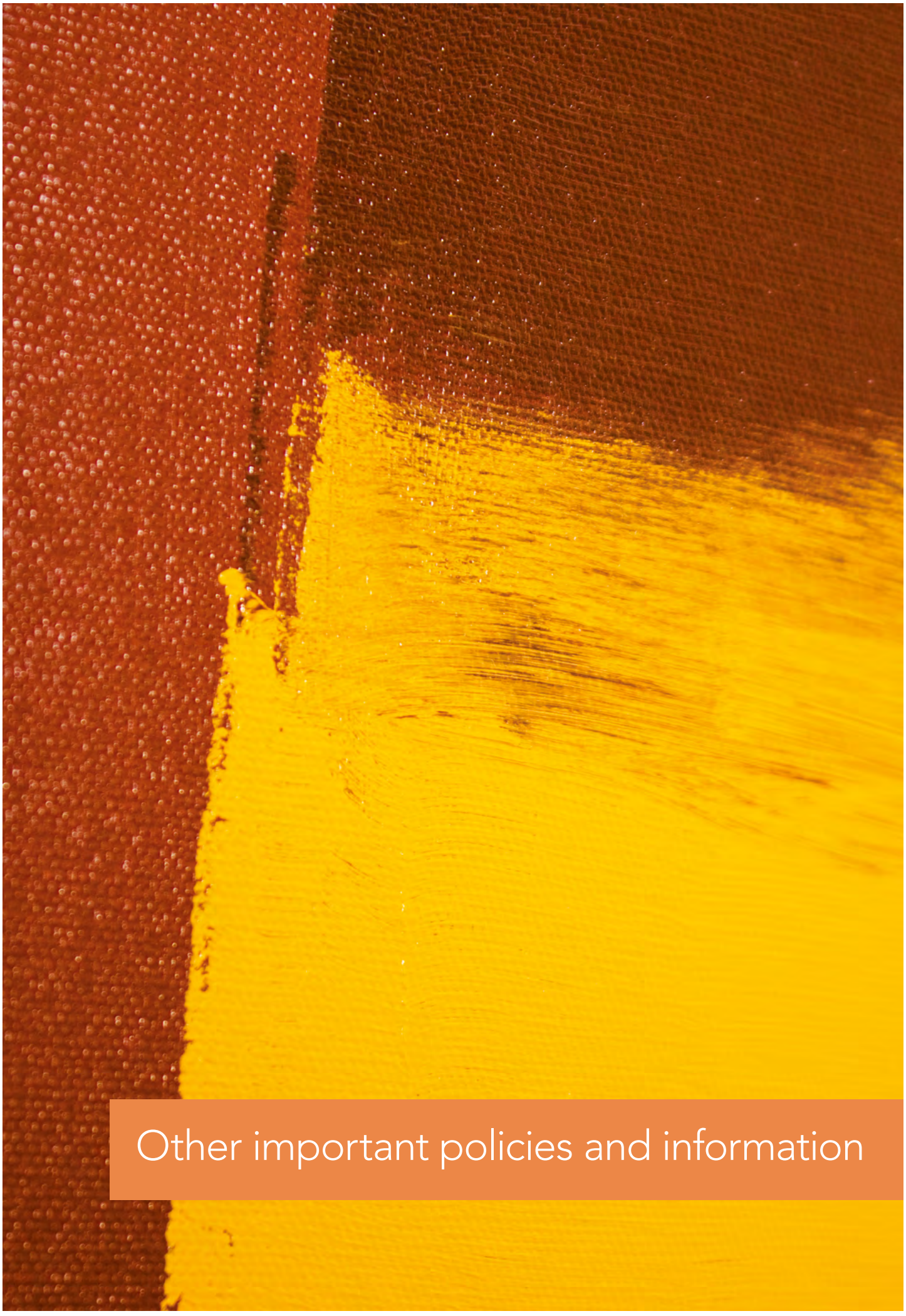
Where possible, the appeal hearing will be conducted by a more senior manager who has not been previously involved in the case. You may bring a companion with you to the appeal hearing.

A hearing may be adjourned if we need to gather any further information or give consideration to matters discussed at the hearing. You will be given a reasonable opportunity to consider any new information obtained before the hearing is reconvened.

Following the appeal hearing we may:
- Confirm the original decision.
- Revoke the original decision; or
- Substitute a different penalty.

We will inform you in writing of our final decision as soon as possible, usually within one week of the appeal hearing. Where possible we will also explain this to you in person. There will be no further right of appeal.

EQUAL OPPORTUNITIES POLICY



Other important policies and information

Other important policies and information

Tudor Rose is committed to the principles of equal opportunities in employment and recognises the true value of diversity in the workplace.

The Company is opposed to any form of unfair treatment (direct or indirect) whether it be on the grounds of someone's sex, sexual orientation, status as a married person or a civil partner, race, colour, age, nationality, ethnic origin, religion, beliefs or because of a disability, pregnancy or childbirth, or because they are a member or non-member of a trade union. We also acknowledge that part-time workers should be treated no less favourably and that flexible working arrangements can benefit the Company as well as the employee.

Discrimination
You must not unlawfully discriminate against or harass other people including current and former employees, job applicants, clients, customers, suppliers and visitors. This applies in the workplace, outside the workplace (when dealing with customers, suppliers or other work-related contacts), and on work-related trips or events including social events.

The following forms of discrimination are prohibited under this policy and are unlawful:

- **Direct discrimination:** treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or because they might be gay.

- **Indirect discrimination:** a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others, and is not justified. For example, requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.

- **Harassment:** this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt with further in our Anti-harassment and Bullying Policy.

- **Victimisation:** retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.

- **Disability discrimination:** this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

Recruitment
Recruitment, promotion, and other selection exercises such as redundancy selection will be conducted on the basis of merit, against objective criteria that avoid discrimination. Shortlisting should be done by more than one person, where possible. Our recruitment procedures should be reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities.

Vacancies should generally be advertised to a diverse section of the labour market. Advertisements should avoid stereotyping or using wording that may discourage particular groups from applying.

We take steps to ensure that our vacancies are advertised to a diverse labour market.

Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.

Job applicants should not be asked about health or disability before a job offer is made. There are limited

exceptions which should only be used with the approval of the Human Resources Department. For example:

- Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments).
- Questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment.
- Positive action to recruit disabled persons.
- Equal opportunities monitoring (which will not form part of the selection or decision-making process).
- Where necessary, job offers can be made conditional on a satisfactory medical check.

We are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to satisfy current immigration legislation. The list of acceptable documents is available from UK Border Agency.

To ensure that this policy is operating effectively, and to identify groups that may be underrepresented or disadvantaged in our organisation, we monitor applicants' ethnic group, gender, disability, sexual orientation, religion and age as part of the recruitment procedure. Provision of this information is voluntary and it will not adversely affect an individual's chances of recruitment or any other decision related to their employment. The information is removed from applications before shortlisting, and kept in an anonymised format solely for the purposes stated in this policy. Analysing this data helps us take appropriate steps to avoid discrimination and improve equality and diversity.

Training and Promotion and Conditions of Service
Training needs will be identified through regular appraisals. You will be given appropriate access to training to enable you to progress within the organisation and all promotion decisions will be made on the basis of merit.

Our conditions of service, benefits and facilities are reviewed regularly to ensure that they are available to all of you who should have access to them and that there are no unlawful obstacles to accessing them.

Termination of Employment
We will ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory.
We will also ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

Disability
If you are disabled or become disabled, we encourage you to tell us about your condition so that we can support you as appropriate.

If you experience difficulties at work because of your disability, you may wish to contact your line to discuss any reasonable adjustments that would help overcome or minimise the difficulty. Your line manager may wish to consult with you and your medical adviser about possible adjustments. We will consider the matter carefully and try to accommodate your needs within reason. If we consider a particular adjustment would not be reasonable we will explain our reasons and try to find an alternative solution where possible.

We will monitor the physical features of our premises to consider whether they might place anyone with a disability at a substantial disadvantage. Where necessary, we will take reasonable steps to improve access.

Part-time and Fixed term Workers
Part-time and fixed-term staff should be treated the same as comparable full-time or permanent staff and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate), unless different treatment is justified.

Breaches of this Policy

Other important policies and information

We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Procedure. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal.

The affected employee may take an informal approach initially by explaining to the person causing offence that their behaviour is unacceptable. Asking a fellow employee for support in this may also be helpful. The matter can also be dealt with informally by raising the issue with a line manager, director or the Head of Operations. If the informal approach does not resolve the matter or is not a possible option, then the matter or complaint should be raised formally under the grievance procedure. The views of the affected employee will be respected and any genuine complaint or grievance will be taken seriously by Tudor Rose. Complaints will be treated in confidence and investigated as appropriate.

Where your grievance is with your own manager you may discuss/highlight your grievance to the next most senior level of manager/director or to HR.

Where appropriate, disciplinary action may be taken against any employee whose conduct is unacceptable. harassment and discrimination are forms of behaviour that may be regarded as gross misconduct and, as such, unacceptable to Tudor Rose.

While the Company is committed to taking all such complaints and issues seriously, if after investigation complaints are found to be vexatious, disciplinary action may be taken against the employee raising the complaint.

There must be no victimisation or retaliation against staff who complain about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our Disciplinary Procedure. This policy covers all forms, physical or non-physical, of harassment, bullying or discriminatory behaviour.

Rehabilitation of offenders
It is the Company's policy not to discriminate against anyone who has a spent conviction under the Rehabilitation of Offenders Act 1974. Under that act it is unlawful to refuse to engage or to dismiss on the grounds of a spent conviction. It is the Company's policy to comply with the act.

ENVIRONMENTAL POLICY

It is the policy of Tudor Rose to operate in a manner which minimises environmental impact and which promotes environmental responsibility.

It is company policy to:

- Ensure that employees act in accordance with this policy and in compliance with any environmental management systems.
- Implement procedures to detect, and where possible prevent, pollution through accidental emissions or effluent discharges.
- Continually strive to improve the Company's environmental performance.
- Set and monitor environmental objectives and targets.
- Reduce waste and the consumption of resources (materials, fuel and energy) and ensure that unavoidable waste is recycled, reused or recovered, where possible, or disposed of responsibly.
- Foster a sense of responsibility for the environment amongst the Company's employees.
- Monitor, and where possible reduce, the impact of the Company's activities on the local and general environment.
- Ensure compliance with relevant legislation and regulations.

PUBLIC INTEREST DISCLOSURE POLICY

Other important policies and information

Tudor Rose is committed to ethical business practice and, with that in mind, encourages an open culture in raising any concerns about how the Company and its employees conduct themselves.

This policy exists to set out acceptable standards of behaviour and to promote the resolution of such sensitive issues from within the Company. Protection exists under the Public Interest Disclosure Act and any employee or worker who makes a bona fide report under the procedure will not be subject to any detriment.

Employees and workers are encouraged to use this procedure if they have reasonable belief or are concerned about any wrongdoing in relation to Tudor Rose's activities or those of employees. Such matters may be raised in the knowledge that they will be treated as confidential and that no action will be taken against the employee or worker.

The nature of wrongdoing might fall into six key areas as follows:
- A criminal offence has been, is being or is about to be committed.
- A breach of the Company's policies including the anti-bribery procedure detailed in this handbook.
- Tudor Rose as the employer is failing to comply with its legal obligations.
- A miscarriage of justice has happened or is likely to happen.
- An individual's health and safety is being jeopardized.
- The environment is or is likely to be damaged.
- Information falling into any of the above categories has been, is being or is likely to be deliberately concealed.

Procedure
The procedure at each stage will be as follows:

- Other than at the first stage, concern must be raised in writing stating that the matter has been raised under this procedure.
- Employees may, at their own choosing, be accompanied by a work colleague or trade union representative.
- Not more than five working days will lapse between the date of application and the employee being informed of a decision at each stage.
- A written statement from the line manager or director will be provided to record the outcome of each stage of the procedure. This will not be held in the individual's HR file.

Stage one
The employee or worker should raise the matter informally with their line manager.

Stage two
If not resolved, the employee or worker must raise the matter in writing to HR or a director.

Stage three
If still not resolved, the employee or worker must raise the matter in writing again with the Managing Director.

The employee or worker should, after stage one, raise the matter with HR when it is felt that the need exists for independence from the business area concerned. HR reserves the right to refer the matter to the appropriate stage as detailed above.

It is recognised that, if the matter cannot be dealt with internally, it may be appropriate to involve external organisations or authorities.

Tudor Rose encourages employees and workers to disclose concerns, but if this policy is invoked in bad faith and with malice in mind, it will constitute misconduct under the Disciplinary Procedure.

DATA PROTECTION POLICY

Other important policies and information

Tudor Rose holds and processes information about employees and other subjects for essential administrative and commercial purposes. When handling such information, Tudor Rose and all employees who possess or use any personal information, must comply with the data protection principles which are governed by UK GDPR.

In summary, these principles state that personal data shall be:
- Processed fairly and lawfully.
- Processed for limited purposes and in an appropriate way.
- Adequate, relevant and not excessive for the purpose.
- Accurate.
- Not kept longer than necessary for the purpose.
- Processed in line with individuals' rights.
- Secure.
- Not transferred to people or organisations situated in countries without adequate protection.

"Personal data" means recorded information we hold about you from which you can be identified. It may include contact details, other personal information, photographs, expressions of opinion about you or indications as to our intentions about you. "Processing" means doing anything with the data, such as accessing, disclosing, destroying or using the data in any way.

We will only process your personal data as governed by UK GDPR rules where you have given your consent or where the processing is necessary to comply with our legal obligations. In other cases, processing may be necessary for the protection of your vital interests, for our legitimate interests or the legitimate interests of others. The full list of conditions is set out in our Privacy Policy.

Employees' agreement
As part of their employment within the organisation, employees agree and consent explicitly to the Company collecting, handling and storing data relating to that employee, within the scope of the UK GDPR regulations and the Company's policies.

Employees' personal data
The Company only holds personal data collected from the start of the employment application and through continuing employment. Such information includes but is not limited to:

- Details of recruitment selection information including third-party employment references and information available in the public domain from, for example, forums such as Facebook.
- Employment reports or assessments including performance reviews and appraisals, disciplinary details, including informal and formal warnings.
- Grievance procedures and outcomes.
- Appeals processes and outcomes.
- Salary reviews, benefits records and expenses claims.
- Health records including individual health details, sick-notes (self-certificates, doctors and hospital notes) which may be used and released in the event of medical emergency.
- Documentation required to satisfy statutory requirements including, but not limited to, right to work in the UK, P45/46.
- Documentation required to satisfy legislative requirements, for example evidence of relevant qualifications, right to work in the UK etc.

This information is held and processed only where essential to the effective running of the Company and to ensure that the Company complies with other statutory and legal requirements.

Other important policies and information

Maintaining records
The organisation will take all reasonable steps to ensure that personal data held is kept up to date. The Company will therefore ask employees when appropriate and required, to check that their personal information held by the Company is correct. Employees should always ensure that changes to their personal details (surname, address, telephone numbers, qualifications etc.) are communicated to the Head of Operations. Out of date information will be deleted by the Company.

Sickness and health records
For day-to-day management, the Company needs to keep records relating to the personal sickness and health records for each employee. Such personal data will record any periods of sickness or health matters, detailing the length and nature of the issue and any outcome. These records will be used to assess the health and welfare of employees. Such information may be released to third parties in the event of medical emergency.

Security of data
The Company is committed to the secure storage and, where undertaken, the secure transmission of employees' personal data. All employees are reminded that unauthorised attempts to gain access to such data is a disciplinary offence and in certain circumstances may constitute gross misconduct.

External data processing
Where the Company uses third parties to process data and provide services or administer schemes around such data, the Company will take reasonable steps to ensure that such third parties have in place their own data protection policies which are compliant with UK GDPR regulations

Equal opportunities monitoring
The Company may collect information relating to ethnic origin, sex and disability as part of its equal opportunity policy. The Company will ensure that any questionnaire relating to such information is accurate and that where possible the results will identify employment trends within the Company and not identify individual employees.

Data access and disclosure
Employees and other data subjects have the right to request access to data held by the Company directly relating to them. Such requests must be made in writing to a Director. Under the act, the Company is entitled to seek a fee of £10 for each request, although would not under normal circumstances request such a fee.

The Company seeks to meet such requests promptly but will ensure that it does so within 40 days of a request, unless there is good reason for delay. In such cases, the reason for the delay will be explained in writing by the Head of Operations.

Employee monitoring
The Company will inform all employees where the monitoring is introduced or increased and will take reasonable steps to ensure that the employee's privacy and autonomy are preserved. However, the Company retains the right to monitor the actual use of its resources by employees including accessing communications and IT facilities which are believed to be in relation to performance of business activities.

Retention of employee records
The Company will keep different types of information for differing lengths of time, depending on legal and business requirements as stipulated by UK GDPR regulations.

Other important policies and information

EXPENSES POLICY

Without exception all expenses must be claimed using either the car travel expense claim form, for claims relating to car journeys, or the general expenses claim form for all other claims. Both forms can be found on the Tudor Rose SharePoint or via these links. Car expenses form Expenses form

Car claims must be submitted along with a printout of the journey taken from www.theaa.com. This website will provide a set distance for the journey taken and it is this figure which can be claimed for. All other claims must be submitted with supporting receipts.

The purpose of the claim must be stated on the claim form, such as a client visit, naming the client involved and the publication or agency job it relates to.

To ensure claims are processed and paid with wages in the current month claims must be submitted by the 10th of each month. Claims submitted after this date may not be reimbursed until the following month's wages.

Claims submitted that are more than two months old may be refused and employees left liable for the expense.

If in any doubt about allowable expenditure, check with a director before the expense is incurred. If it is not justified you might have to incur the costs personally.

Allowable claims (general)
Claims are permitted for expenses incurred as part of your business activities, such as client meetings, client entertaining and car parking etc. You must be prepared to justify all expenditure and the level of costs incurred.

Claims for overnight travel
When you have to stay overnight on business you may claim for meals and incidental costs up to £15 per night in the UK and £20 for overseas travel. you must provide receipts for all expenses incurred and claim in the normal way.

Claims for overseas travel
You should arrange to obtain your own local currency. Ensure you keep the receipt for this currency as commission and bank charges may be claimed for and the exchange rate on the receipt will be used to convert expense claims into sterling so that you can be reimbursed. If local currency is provided you must keep receipts and list expenditure with the funds on a separate expenses claim form. Unused currency must be returned to the finance department on return from the trip.

Claiming for accommodation and travel (other than car travel)
Travel must always be booked in standard accommodation on trains and economy on flights. Hotel accommodation should not exceed £120 in London and £90 for other UK regions.

You should always request authorisation from your line manager prior to incurring the expense. As with all claims, receipts must be submitted with claim forms.

Company credit cards
If you have been issued with a company credit card, receipts must be given to the Head of Operations. As with all expenses you must provide a reason for the expenditure incurred.

Entertainment of Tudor Rose personnel
A Tudor Rose employee cannot entertain another employee of Tudor Rose at company expense.

Tax
Expenses incurred wholly, exclusively and necessarily in the performance of the duties of employment do not incur a tax liability. Unless incurred in this manner, other expenses claimed may be classed as a benefit in kind and as a result you may incur a personal tax liability.

Other important policies and information

Summary

- If in doubt about an allowable expense, get the expense authorised by a director prior to incurring it
- Keep receipts and submit them with all claims
- If an expense is related to a client project, detail the job code if available
- When expenses relate to a client, detail the name of the client, their company, and the purpose of the meeting on the claim form
- False expenses claims will be dealt with through the Disciplinary Procedure.

SECURITY POLICY

You must ensure that all documents, papers, correspondence etc. are kept secure at all times and are carefully locked away at night, and that all security procedures are properly maintained at all times. You are not expected to take home any papers or documents belonging to the Company except where this is necessary for the proper performance of your duties.

The Company's policy is to comply fully with the requirements of the UK GDPR and it is essential that you follow the Company's rules and instructions very carefully on all aspects of data protection.

At all times, the premises are to be kept secure and vigilance is asked of everyone in maintaining the security of the business and its employees. during the evening after 5.30 pm the external door to the front of the building must be kept shut. All windows on the lower floor must be kept shut at all times. The last person leaving each work area must ensure that their area is secure. The last person leaving the building must check all offices, toilets, kitchen and meeting rooms to ensure nobody is left in the building, all windows are closed and lights and electrical heaters switched off. It is the responsibility of all to do so in their area of work.

COMPANY PROPERTY

Employees are not permitted to remove from the Company's premises any tools, materials, company property, data or information without written permission from a director.

PERSONAL PROPERTY

Liability is not accepted for employees' possessions, property or vehicles that are damaged, lost or stolen while on any Company premises or while conducting Company business. While everyone respects each other's property, money or valuables should not be left unattended.

CHANGE IN PERSONAL DETAILS

It is important that you inform the Company of any changes to your personal details such as change of address and/or telephone numbers, next of kin/emergency contact details and bank or building society details for payroll purposes. please ensure that you advise the Head of Operations.

DRESS AND APPEARANCE

The Company's approach toward dress and appearance is that it expects smart, casual appearance that does not contravene strict religious and cultural requirements for employees or discriminate between male and female employees.

Employees who meet with external parties such as customers are expected to adopt dress and appearance that represents the Company in a professional way.

Other important policies and information

Suitable footwear should be worn at all times with health and safety considerations in mind.

ANTI-BRIBERY AND CORRUPTION POLICY

It is Tudor Rose's policy to conduct business in an honest way and without the use of corrupt practices or acts of bribery to obtain an unfair advantage or favour.

The Company attaches the utmost importance to this policy and will apply a 'zero tolerance' approach to intentional acts of bribery and corruption by any of employee, worker or business partner working on behalf of Tudor Rose. Any breach of this policy will be regarded as a serious matter by the Company and, in the case of employees, may be dealt with as a disciplinary matter, potentially being classed as gross misconduct. It must also be highlighted that bribery is a criminal offence.

The purpose of this policy is to:

- set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and
- provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

It is a criminal offence to offer, promise, give, request, or accept a bribe. Individuals found guilty can be punished by up to ten years' imprisonment and/or a fine. As an employer if we fail to prevent bribery we can face an unlimited fine, exclusion from tendering for public contracts, and damage to our reputation. We therefore take our legal responsibilities very seriously.

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, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

What is Bribery and Corruption?
Bribery is offering, promising, giving or accepting any financial or other advantage, to induce the recipient or any other person to act improperly in the performance of their functions, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage.

An advantage includes money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or anything else of value.

A person acts improperly where they act illegally, unethically, or contrary to an expectation of good faith or impartiality, or where they abuse a position of trust. The improper acts may be in relation to any business or professional activities, public functions, acts in the course of employment, or other activities by or on behalf of any organisation of any kind.

Corruption is the abuse of entrusted power or position for private gain.
Examples:

Offering a bribe
You offer a potential client tickets to a major sporting event, but only if they agree to do business with us.

This would be an offence as you are making the offer to gain a commercial and contractual advantage. We may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the potential client to accept your offer.

Other important policies and information

Receiving a bribe
A supplier gives your nephew a job, but makes it clear that in return they expect you to use your influence in our organisation to ensure we continue to do business with them.

It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

Bribing a foreign official
You arrange for the business to pay an additional "facilitation" payment to a foreign official to speed up an administrative process, such as clearing our goods through customs.

The offence of bribing a foreign public official is committed as soon as the offer is made. This is because it is made to gain a business advantage for us. We may also be found to have committed an offence.

What you must not do
Tudor Rose as a company, its employees, workers or business partners shall not offer, give, seek or receive, either directly or indirectly, inducements or other improper advantages for business or financial gain. This applies to any individual, organisation or entity, anywhere in the world.

Accepting or giving any entertainment or gift that is designed to, or may be seen to influence business decisions, is not acceptable. This would include donations to political parties or charities linked to gaining business or gaining business advantage.

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

- 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.
- Give or accept a gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome.
- Accept a payment, gift or hospitality from a third party that you know or suspect is offered with the expectation that we will provide a business advantage for them or anyone else in return.
- Accept hospitality from a third party that is unduly lavish or extravagant under the circumstances.
- Offer or accept a gift to or from government officials or representatives, or politicians or political parties, without the prior approval of your manager.
- Threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns under this policy.
- Engage in any other 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.

Facilitation payments, also known as "back-handers" or "grease payments", are typically small, unofficial payments made to secure or expedite a routine or necessary action (for example by a government official). They are not common in the UK, but are common in some other jurisdictions.

Kickbacks are typically payments made in return for a business favour or advantage.

You must avoid any activity that might lead to a facilitation payment or kickback being made or accepted by us or on our behalf, or that might suggest that such a payment will be made or accepted. 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.

At no time should an employee accept any gift or other concession or favour, which might compromise or be

seen to compromise them or the Company at that time.

The Company is required to make a p11d entry to the Inland Revenue declaring benefits and therefore the employee must declare to the Head of Operations all gifts and benefits arising out of employment with the Company (see also bribery and corruption).

What is acceptable?
This policy allows reasonable and appropriate hospitality or entertainment given to or received from third parties, for the purposes of:

- Establishing or maintaining good business relationships.
- Improving or maintaining our image or reputation.
- Marketing or presenting our products and/or services effectively.

It is difficult to provide a comprehensive list of what is and is not acceptable as the individual circumstances can make a key difference. The following are deemed to be acceptable practices:

- Modest/occasional meals with someone with whom Tudor Rose does business.
- Occasional attendance at ordinary sports, theatre and other cultural events.
- Gifts of nominal value, such as pens, or small promotional items.

Providing or attending genuine business hospitality and carrying out proportionate and reasonable promotional activities are acceptable. Donations made in good faith are also acceptable.

How to evaluate what is acceptable:

- What is the intent – is it to build a business relationship or is it for some other purpose?
- How would this look to a third party if, for instance, these details were published?
- What if the situation were to be reversed – would there be a double standard?

If the answer to any of above questions raises concerns or issues, then it might be that you are potentially exposing yourself and the Company to damaging bribery claims.

Procedure
Any gift, hospitality or other benefit given or received by an employee in connection with Tudor Rose above a value of £50 (or estimated as such) must be entered in to the Bribery Register held with the Head of Operations. all donations associated with Tudor Rose regardless of value must also be entered into the Bribery Register.

If you are in any doubt as to whether you may accept an offer, the simple answer is to politely decline or to discuss the matter with a director or Head of Operations as soon as possible. In certain regions, offering of gifts is an integral part of the culture and not accepting such a gift may be seen as an impoliteness. Gifts may be accepted on this basis but must be declared and entered into the Bribery Register.

If as an employee you have any doubt or believe that you may be affected by or potentially involved in bribery and corruption, unintentionally or otherwise, it is important to advise a director or the Head of Operations at the earliest opportunity.

The Company reserves the right to request that any gift, inducement or gain be returned to the individual or entity concerned.

The Head of Operations shall be responsible for periodically reviewing the risk assessment covering bribery and corruption in relation to Tudor Rose, its activities and the regions in which it operates. any specific arrangements or updates to this policy will be communicated to employees in writing as and when required.

REDUNDANCY POLICY

Other important policies and information

Tudor Rose is a successful and developing business. however, like any organisation, it might on occasions need to reorganise or reduce the size of certain areas of the business. Should it ever be necessary to reduce the numbers employed in particular departments or skill areas, the Company will, through consultation, seek to minimise the scale and impact of any proposal for redundancy.

Should it be necessary to make redundancies, these will be carried out in accordance with the statutory requirements and entitlements at the time of any redundancy. Any selection of individuals for redundancy would be based on the needs of the business and the skills, performance, disciplinary record and attendance of individuals.

RETIREMENT POLICY

Employees may make the decision to voluntarily retire at any time. The Company, do not operate a default retirement age and for its part, will not dismiss any employee for reasons related to retirement or age. Tudor Rose also recognises the significant business benefits of experience and skills gained over time.

Employees considering retirement may discuss their thoughts informally and confidentially with their line manager or HR and may choose to change their mind about dates or intentions discussed. To confirm the intention to retire, the employee must confirm in writing their decision to do so along with a proposed retirement date. Once confirmed in writing, the decision to retire and date of retirement cannot be revised, unless agreed otherwise in writing by the Company.

The Company also recognises that retirement presents many opportunities for the employee but is also a significant change in lifestyle. Subject to business needs and employee wishes, the Company will consider a phased reduction in working hours to provide a transition period.

TELECOMMUNICATIONS POLICY

Whenever possible, private incoming and outgoing telephone calls should be made outside of working hours. Communication channels provided by the Company are for business use only and not for private use unless a request is made.

Responsible use of personal mobile phones is expected but only essential calls or messaging should be made or received during working hours.

INFORMATION COMMUICATIONS AND TECHNOLOGY POLICY

Our ICT and communications systems are intended to promote effective communication and working practices within our organisation. This policy outlines the standards you must observe when using these systems, the circumstances in which we will monitor your use, and the action we will take in respect of breaches of these standards.

This policy covers all employees, officers, consultants, contractors, volunteers, interns, casual workers, agency workers and anyone who has access to our ICT and communication systems.

At Tudor Rose, communication with colleagues, clients and business partners plays an essential role in the conduct of our business. How you communicate with other individuals reflects both upon you as a person and Tudor Rose as an organisation. Misuse of ICT and communications systems can damage the business and our reputation. Breach of this policy may be dealt with under our Disciplinary Procedure and, in serious cases, may be treated as gross misconduct leading to summary dismissal.

Any suspicion of breach of the policy must be reported to the ICT Manager and your line manager immediately. Failure to do constitutes a breach of the policy. The ICT Manager can suspend access to

any accounts affected by a breach in the ICT Policy.
This policy does not form part of any employee's contract of employment and we may amend it at any time.

Managers have a specific responsibility to ensure the fair application of this policy and all members of staff are responsible for supporting colleagues and ensuring its success.

The ICT Manager will deal with requests for permission or assistance under any provisions of this policy, and may specify certain standards of equipment or procedures to ensure security and compatibility.

Definitions
"ICT" refers to any communications device, application or service, including: mobile telephones, laptop, desktop and tablet computers, applications, whether installed on a device or accessed via the internet, such as those within Microsoft Office, Microsoft Dynamics CRM and Adobe software, e-mail and other messaging services, radio, television, network and software.

"User" refers to any person who accesses an ICT system or service owned, managed or supplied by Tudor Rose.

"Network" refers to any data communications links such as ethernet, wireless or fibre at Tudor Rose offices or provided by Tudor Rose via the internet.

Equipment Security and Passwords
You are responsible for the security of the equipment allocated to or used by you, and must not allow it to be used by anyone other than in accordance with this policy.

You are responsible for the security of any computer terminal used by you. You should lock your terminal or log off when leaving it unattended or on leaving the office, to prevent unauthorised users accessing the system in your absence. Anyone who is not authorised to access our network should only be allowed to use terminals under supervision.

You should use passwords on all ICT equipment, particularly items that you take out of the office. You must keep your passwords confidential and change them regularly. You must not use another person's username and password or make available or allow anyone else to log on using your username and password unless authorised by the ICT Manager. On the termination of employment (for any reason) you must provide details of your passwords to the ICT Manager and return any equipment, key fobs or cards.

If you have been issued with a laptop, you must ensure that it is kept secure at all times, especially when travelling. Passwords must be used to secure access to data kept on such equipment to ensure that confidential data is protected in the event of loss or theft. You should also be aware that when using equipment away from the workplace, documents may be read by third parties, for example, passengers on public transport.

Systems and Data Security
You should not delete, destroy or modify existing systems, programs, information or data (except as authorised in the proper performance of your duties).

You must not download or install software from external sources without authorisation from the ICT Manager. This includes software programs, instant messaging programs, screensavers, photos, video clips and music files. Incoming files and data should always be virus-checked by the ICT Manager before they are downloaded. If in doubt, staff should seek advice from the ICT Manager.

You must not attach any device or equipment to our systems without authorisation from the ICT Manager. This includes any USB flash drive, MP3 or similar device, PDA or telephone, whether connected via the USB port, infra-red connection port or in any other way.
We monitor all e-mails passing through our system for viruses. You should exercise particular caution

when opening unsolicited e-mails from unknown sources or an e-mail which appears suspicious (for example, if it contains a file whose name ends in.exe). Inform the ICT Manager immediately if you suspect your computer may have a virus. We reserve the right to delete or block access to e-mails or attachments in the interests of security. We also reserve the right not to transmit any e-mail message.

You should not attempt to gain access to restricted areas of the network, or to any password-protected information, except as authorised in the proper performance of your duties.

If you use laptops or wi-fi enabled equipment, you must be particularly vigilant about its use outside the office and take such precautions as we may require from time to time against importing viruses or compromising system security. The system contains information which is confidential to our business and/or which is subject to data protection legislation. Such information must be treated with extreme care and in accordance with our Data Protection Policy.

Email
Although e-mail is a vital business tool, you should always consider if it is the appropriate method for a particular communication. Correspondence with third parties by e-mail should be written as professionally as a letter. Messages should be concise and directed only to relevant individuals.

You must not send abusive, obscene, discriminatory, racist, harassing, derogatory, defamatory, or otherwise inappropriate e-mails. Anyone who feels that they have been harassed or bullied, or are offended by material received from a colleague via e-mail should inform their line manager.

You should take care with the content of e-mail messages, as incorrect or improper statements can give rise to claims for discrimination, harassment, defamation, breach of confidentiality or breach of contract. Staff should assume that e-mail messages may be read by others and not include anything which would offend or embarrass any reader, or themselves, if it found its way into the public domain.

E-mail messages may be disclosed in legal proceedings in the same way as paper documents. Deletion from a user's inbox or archives does not mean that an e-mail cannot be recovered for the purposes of disclosure. All e-mail messages should be treated as potentially retrievable, either from the main server or using specialist software.

In general, you should not:

- Send or forward private e-mails at work which you would not want a third party to read.
- Send or forward chain mail, junk mail, cartoons, jokes or gossip.
- Contribute to system congestion by sending trivial messages or unnecessarily copying or forwarding e-mails to those who do not have a real need to receive them.
- Sell or advertise using our communication systems or broadcast messages about lost property, sponsorship or charitable appeals.
- Agree to terms, enter into contractual commitments or make representations by e-mail unless appropriate authority has been obtained. A name typed at the end of an e-mail is a signature in the same way as a name written at the end of a letter.
- Download or e-mail text, music and other content on the internet subject to copyright protection, unless it is clear that the owner of such works allows this.
- Send messages from another person's e-mail address (unless authorised) or under an assumed name.
- Send confidential messages via e-mail or the internet, or by other means of external communication which are known not to be secure.

You should return any wrongly-delivered e-mail received to the sender. Do not use your own personal e-mail account to send or receive e-mail for the purposes of our business. Only use the e-mail account we have provided for you.

Never reply to any Spam or Phishing emails or access links provided within such e-mails. Spam email is unsolicited email, often referred to as 'junk' email and is often indiscriminately sent to multiple email addresses, usually inviting you to purchase a product or service. Phishing is an attempt to fraudulently acquire sensitive or person identifiable information like credit card details, bank account details,

passwords or other similar information, usually by masquerading as a trustworthy source, such as a bank.

Consider bandwidth implications when adding attachments to e-mail messages. If you need to transmit files in excess of 20MB consult with the ICT Manager to decide upon the most effective means of transmission.

Exercise good practice with e-mail use to ensure that it isn't disruptive to your work or that of your colleagues, clients and business partners. Avoid sending unnecessarily long messages and pay specific consideration to whether recipients should be on the To: line (generally meaning action is required) or Cc: line (generally meaning for information only).

Do not send personal emails to large numbers of recipients. Do not use e-mail in a manner that is similar to instant messaging.

Using the Internet
When a website is visited, devices such as cookies, tags or web beacons may be employed to enable the site owner to identify and monitor visitors. If the website is inappropriate, such a marker could be a source of embarrassment to the visitor and us, especially if inappropriate material has been accessed, downloaded, stored or forwarded from the website. Such actions may also, in certain circumstances, amount to a criminal offence if, for example, the material is pornographic in nature.

You should not access any web page or download any image, document or other file from the internet which could be regarded as illegal, offensive, in bad taste or immoral. Even web content legal in the UK may be in sufficient bad taste to fall within this prohibition. As a general rule, if any person (whether intended to view the page or not) might be offended by the contents of a page, or if the fact that our software has accessed the page or file might be a source of embarrassment if made public, then viewing it will be a breach of this policy.

You should not under any circumstances use our systems to participate in any internet chat room, post messages on any internet message board or set up or log text or information on a blog or wiki, even in your own time.

Personal Use of Our Systems
We permit the incidental use of internet, e-mail and cloud based telephone systems to send personal e-mail, browse the internet and make personal telephone calls subject to certain conditions set out below. Personal use is a privilege and not a right. It must not be overused or abused. We may withdraw permission for it at any time or restrict access at our discretion.

Personal use must meet the following conditions:

- Use must be minimal and take place substantially out of normal working hours (that is, during lunch hours, before 9 am or after 5.30 pm).
- Must not incur any cost to the company.
- Must not interrupt the work of your colleagues.
- Personal e-mails must be labelled "personal" in the subject header and stored in files marked 'personal'.
- Use must not interfere with business or office commitments.
- Use must not commit us to any marginal costs.
- Use must comply with our policies including the Equal Opportunities Policy, Data Protection Policy and Disciplinary Procedure.

You should be aware that personal use of our systems may be monitored and, where breaches of this policy are found, action may be taken under the disciplinary procedure. We reserve the right to restrict or prevent access to certain telephone numbers or internet sites if we consider personal use to be excessive.

The following scenarios would be typically considered as unacceptable personal use of ICT:

- Making personal long-distance telephone calls.
- Using a work email address to apply for new jobs.
- Forwarding a joke received by email onto colleagues and external recipients.
- Subscribing to internet forums using a work email address.
- Replying to multiple emails throughout the day to organising non-work related social activities.
- Having personal social media alerts activated throughout working hours.
- Making personal calls to premium rate telephone numbers.

Monitoring

Our systems enable us to monitor telephone, e-mail, voicemail, internet and other communications. For business reasons, and in order to carry out legal obligations in our role as an employer, use of our systems including the telephone and computer systems, and any personal use of them, may be continually monitored by automated software or otherwise. Monitoring is only carried out to the extent permitted or as required by law and as necessary and justifiable for business purposes.

Tudor Rose may monitor your business communications for reasons which include:

- Providing evidence of business transactions.
- To find lost messages or to retrieve messages lost due to computer failure.
- To assist in the investigation of alleged wrongdoing.
- Ensuring that Tudor Rose's business procedures, policies and contracts with staff are adhered to.
- Complying with any legal obligations.
- Monitoring standards of service, staff performance, and for staff training.
- Preventing or detecting unauthorised use of Tudor Rose's ICT or criminal activities.
- Maintaining the effective operation of Tudor Rose's communication systems.

Tudor Rose will monitor telephone, e-mail, internet and social media data (e.g. sender, receiver, subject; non-business attachments to e-mail, numbers called and duration of calls; domain names of web sites visited, duration of visits, and non-business files downloaded from the internet) at a network level (but covering both personal and business communications) for the purposes specified above. For the purposes of your maintenance of your own personal privacy, you need to be aware that such monitoring might reveal sensitive personal data about you. By carrying out such activities using Tudor Rose's facilities you consent to our processing any sensitive personal data about you which may be revealed by such monitoring.

Sometimes it is necessary for Tudor Rose to access your business communications during your absence, such as when you are away because you are ill or while you are on holiday. Unless your mailbox settings are such that the individuals who need to do this already have permission to view your inbox, access will be granted only with the permission of your line manager or a Director.

Any e-mails which are not stored in a folder named 'Personal' in your mailbox are considered business communications since we have no way of knowing that they were intended to be personal. Furthermore, there is a risk that any person authorised to access your mailbox may have their own preview pane option as a default setting, which would reveal the content of any of your personal e-mail not filed in your 'Personal' folder. Therefore, as a provision for when you are out of the office, you may wish to set up a rule to automate the routing of personal e-mail to your personal folder – ask the ICT department for guidance on how to do this. It is up to you to prevent the inadvertent disclosure of the content of personal e-mail by filing your personal e-mail in accordance with this policy. In particular, you are responsible to anybody outside Tudor Rose who sends to you, or receives from you, a personal e-mail, for the consequences of any breach of their privacy which may be caused by your failure to file your personal e-mail.

In certain very limited circumstances we may, subject to compliance with any legal requirements, access e-mail or folders marked 'Personal'. Examples are when we have reasonable suspicion that they may reveal evidence of unlawful activity, including instances where there may be a breach of a contract with Tudor Rose or serious breach of policies including this ICT policy.

In cases where investigation of traffic or content of user accounts is necessary then the ICT Manager will

carry out such work following authorisation from Human Resources or a Director. Tudor Rose will involve the police in all cases where they believe illegal activity has taken place.

All incoming e-mails are scanned by using virus-checking software. The software will also attempt to block unsolicited marketing e-mail (spam), banned keywords and e-mails which have potentially inappropriate attachments. Inform the ICT Manager if you would like any e-mails you are receiving to be blocked, or require any further guidance on dealing with spam.

Existing users of ICT will be notified of this policy and future changes. The users' continued use of ICT after notification will constitute acceptance and agreement to the policy document.

Future employees will be notified of the policy when they sign their contract of employment and will only be granted access to Tudor Rose systems and equipment once they have signed to accept this policy.

The ICT Manager will ensure this policy is reviewed annually to reflect best practice with revisions being approved by Human Resources and Directors.

Prohibited Use of Our Systems
Access is granted to the internet, telephones and other electronic systems for legitimate business purposes only. Incidental personal use is permissible provided it is in full compliance with our rules, policies and procedures (including this policy, the Equal Opportunities Policy, Data Protection Policy and Disciplinary Procedure).

Misuse or excessive personal use of our telephone or e-mail system or inappropriate internet use will be dealt with under our Disciplinary Procedure. Misuse of the internet can in some circumstances be a criminal offence. In particular, misuse of the e-mail system or inappropriate use of the internet by participating in online gambling or chain letters or by creating, viewing, accessing, transmitting or downloading any of the following material will usually amount to gross misconduct (this list is not exhaustive):

- Pornographic material (that is, writing, pictures, films and video clips of a sexually explicit or arousing nature).
- Chain messages and jokes.
- Private commercial activities.
- Any form of defamation, discrimination, harassment or bullying.
- The introduction of viruses, spyware or malware.
- Causing harm to or bringing disrepute to Tudor Rose, a customer, business partner or colleague.
- Representing personal opinions as that of the company.
- Where it interferes with/impedes the business of Tudor Rose.
- Where it misuses personal data of employees, clients or business partners.
- Offensive, obscene, or criminal material or material which is liable to cause embarrassment to us or to our clients.
- A false and defamatory statement about any person or organization.
- Material which is discriminatory, offensive, derogatory or may cause embarrassment to others (including material which breaches our Equal Opportunities Policy).
- Confidential information about us or any of our staff or clients (except as authorised in the proper performance of your duties).
- Any other statement which is likely to create any criminal or civil liability (for you or us).
- Material in breach of copyright.

Any such action will be treated very seriously and is likely to result in summary dismissal.

Where evidence of misuse is found we may undertake a more detailed investigation in accordance with our Disciplinary Procedure, involving the examination and disclosure of monitoring records to those nominated to undertake the investigation and any witnesses or managers involved in the Disciplinary Procedure. If necessary such information may be handed to the police in connection with a criminal investigation.

Users must not in any way cause any form of damage to any Tudor Rose ICT. The term damage includes modifications to hardware, software or infrastructure which whether or not causing harm to the hardware or software, incur time and/or cost in restoring the system to its original state.

Other important policies and information

All software and hardware upgrades, moves and repairs are to be performed by, or under the direct supervision of, the ICT Manager. All damages, breakdowns or malfunctions are to be reported to the ICT Manager.

Users must comply with the terms of conditions of all licence agreements relating to any ICT related hardware, software or services.

Users must not introduce any virus, worm, malware, Trojan horse and other nuisance program or file onto any system.

Users may only access files they have created and files they have been given express permission to access.

Users must not connect any equipment, including personal mobile phones, to the company's internal wireless network without prior authority from the ICT Manager. The external guest wireless network can be used for such devices.

Users must not allow any password associated with his/her username to become known to another user. Users will be held responsible for any unlawful action carried out under his/her computer account unless there is evidence to prove otherwise.

Users must not make known any other passwords which may be supplied to them in to enable access to Tudor Rose ICT.

If leaving devices unattended in Tudor Rose offices, users must ensure that they are password protected.

Do not leave devices unattended when out of the office, unless adequately secured, for example locked at home or in a hotel room or locked and out of sight in a vehicle. Do not store devices in a vehicle overnight.

Users must not download or install any applications without the express prior permission of their line manager and the ICT Manager.

Lost or stolen devices must be reported to your line manager and the ICT Manager within 24 hours.

Users must not engage in any unlawful activity using Tudor Rose ICT.

Other important policies and information

Working remotely
All electronic remote working must only be carried out on Tudor Rose equipment or services supplied by Tudor Rose. Sending documents to a home email account and working on your own device is prohibited unless you have obtained advance permission from your line manager and the ICT Manager.

When working remotely you must:

- When in a public place never leave ICT devices unattended.
- Password protect any work which relates to Tudor Rose's business so that no other person can access your work.
- Position yourself so that your work cannot be overlooked by any other person.
- Take reasonable precautions to safeguard the security of our laptop computers and any computer equipment on which you do Tudor Rose's business, and keep your passwords secret.
- Inform the IT Manager within 24 hours if either a Tudor Rose device in your possession or any computer equipment on which you do Tudor Rose work has been lost or stolen.
- Ensure that any work which you do remotely is saved on Tudor Rose's network or is transferred to the network as soon as reasonably practicable.

Tudor Rose has a zero-tolerance policy using devices while driving. Only hands-free talking while driving is permitted and then only when safe and legal to do so.

Personal Devices
You may use your own devices to access Tudor Rose ICT which is hosted by a third party, which includes email, calendars, contacts, and web-based applications including CRM.

Any devices used to access ICT listed in 11.1 should be adequately password-protected in order that they cannot be accessed by others if lost or stolen.

Do not use your own devices to access the corporate network in any way. For example, do not plug your personal mobile phone into your work laptop.

Personal devices must not be used in any way that contravenes the ICT Policy.

Do not connect personal storage devices including memory sticks to Tudor Rose ICT without the express prior permission of your line manager and the ICT Manager, and not for any purpose that would contravene the ICT Policy.

SOCIAL MEDIA POLICY

This policy is in place to minimise the risks to our business through use of social media.

This policy deals with the use of all forms of social media, including Facebook, LinkedIn, Twitter, Google+, Wikipedia, Whisper, Instagram, Vine, Tumblr and all other social networking sites, internet postings and blogs. It applies to use of social media for business purposes as well as personal use that may affect our business in any way. Employees are responsible for content they publish in social media and can be held personally liable for content published. Employees can also be subject to disciplinary action by Tudor Rose for publishing inappropriate, confidential content or content that damages the reputation of Tudor Rose, a customer, business partner or colleague

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Responsibility for monitoring and reviewing the operation of this policy and making recommendations for change to minimise risks lies with the ICT Manager who will review this policy frequently to ensure that it meets legal requirements and reflects best practice.

Managers have a specific responsibility for operating within the boundaries of this policy, ensuring that all staff understand the standards of behaviour expected of them and taking action when behaviour falls

below its requirements.

All staff are responsible for the success of this policy and should ensure that they take the time to read and understand it. Any misuse of social media should be reported to the ICT Manager.

Compliance with Other Policies
Social media should never be used in a way that breaches any of our other policies. If an internet post would breach any of our policies in another forum, it will also breach them in an online forum. For example, you are prohibited from using social media to:

- Breach our Information and Communications Systems Policy;
- Breach any obligations contained in those policies relating to confidentiality;
- Breach our Disciplinary Policy or procedures;
- Harass or bully other staff in any way;
- Unlawfully discriminate against other staff or third parties;
- Breach our Data Protection Policy (for example, never disclose personal information about a colleague online); or
- Breach any other laws or regulatory requirements.

Staff should never provide references for other individuals on social or professional networking sites, as such references, positive and negative, can be attributed to the organisation and create legal liability for both the author of the reference and the organisation.

Staff who breach any of the above policies will be subject to disciplinary action up to and including termination of employment.

Prohibited Use
You must avoid making any social media communications that could damage our business interests or reputation, even indirectly.

You must not use social media to defame or disparage us, our staff or any third party; to harass, bully or unlawfully discriminate against staff or third parties; to make false or misleading statements; or to impersonate colleagues or third parties.

You must not express opinions on our behalf via social media, unless expressly authorised to do so by your manager. You may be required to undergo training in order to obtain such authorisation.

You must not post comments about sensitive business-related topics, such as our performance, or do anything to jeopardise our trade secrets, confidential information and intellectual property. You must not include our logos or other trademarks in any social media posting or in your profile on any social media.

The contact details of business contacts made during the course of your employment are our confidential information. On termination of employment you must provide us with a copy of all such information, delete all such information from your personal social networking accounts and destroy any further copies of such information that you may have. You must not disclose or use Tudor Rose confidential or proprietary information or that of any other person or company. For example, ask permission before posting someone's picture in a social network or publishing in a blog a conversation that was meant to be private.

Do not comment on Tudor Rose's confidential financial information such as future business performance or business plans.

Do not cite or reference customers, partners or suppliers without their written approval. Some individuals work anonymously, using pseudonyms or false screen names. Tudor Rose discourages that practice.

You must understand and follow all privacy and confidentiality guidelines in the Tudor Rose Company Handbook. All guidelines in the handbook, as well as laws such as copyright, fair use and financial disclosure laws apply to internet and social media use.

Ask permission to publish or report on conversations that are meant to be private or internal to Tudor Rose and when in doubt, always ask permission from a Director.

Speak in the first person when engaging in personal internet and social media communications. Make it clear that you are speaking for yourself and not on behalf of Tudor Rose.

Be aware of your association with Tudor Rose internet and social media – If you identify yourself as a Tudor Rose employee, ensure your profile and related content is consistent with how you wish to present yourself with colleagues and customers. If you publish personal internet and social media communications and it has something to do with the work you do or subjects associated with Tudor Rose, use a disclaimer such as this: "The postings on this site are my own and don't necessarily represent those of Tudor Rose".

Do link back to the source – when you do make a reference to a client, business partner or supplier, where possible link back to the source.

Remember that there are always consequences to what you publish. If you're about to publish something that makes you even the slightest bit uncomfortable, review the suggestions above and think about why that is. If you're still unsure, and it is related to Tudor Rose business, feel free to discuss it with your line manager or simply do not publish it. You have sole responsibility for what you post to your blog or publish in any form of social media.

Do not use offensive content, personal insults, obscenity, or engage in any conduct that would not be acceptable in the Tudor Rose workplace. You should also show proper consideration for others' privacy and for topics that may be considered objectionable or inflammatory.

Do not conduct confidential business with a customer or partner business through your personal or other internet or social media.

Do not register accounts using the Tudor Rose brand name or any other unregistered or registered trademarks.

Upon leaving Tudor Rose, employees are required to change their status on media websites such as LinkedIn to reflect their change in employment so as to not imply or state they remain in employment with Tudor Rose.

Any misuse of social media should be reported to the ICT Manager.

Business Use of Social Media
If your duties require you to speak on behalf of the organisation in a social media environment, you must still seek approval for such communication from your line manager, who may require you to undergo training before you do so and impose certain requirements and restrictions with regard to your activities.

Likewise, if you are contacted for comments about the organisation for publication anywhere, including in any social media outlet, direct the enquiry to a Director and do not respond without written approval.

The use of social media for business purposes is subject to the remainder of this policy.

Guidelines for Responsible Use of Social Media
You should make it clear in social media postings, or in your personal profile, that you are speaking on your own behalf. Write in the first person and use a personal e-mail address.

Be respectful to others when making any statement on social media and be aware that you are personally responsible for all communications which will be published on the internet for anyone to see.

If you disclose your affiliation with us on your profile or in any social media postings, you must state that your views do not represent those of your employer (unless you are authorised to speak on our behalf). You should also ensure that your profile and any content you post are consistent with the professional image you present to clients and colleagues.

If you are uncertain or concerned about the appropriateness of any statement or posting, refrain from posting it until you have discussed it with your manager.

If you see social media content that disparages or reflects poorly on us, you should contact your line manager.

Monitoring
We reserve the right to monitor, intercept and review, without further notice, staff activities using our IT resources and communications systems, including but not limited to social media postings and activities, to ensure that our rules are being complied with and for legitimate business purposes and you consent to such monitoring by your use of such resources and systems.

For further information, please refer to our Information and Communications Systems Policy.

Recruitment
We may use internet searches to perform due diligence on candidates in the course of recruitment. Where we do this, we will act in accordance with our data protection and equal opportunities obligations.

Social Media Security
E-mail, internet and social media is commonly used by the online criminal community to deliver malware and carry out schemes designed to damage property or steal confidential information. To minimize risk related to such threats, adhere to the following guidelines. While these guidelines help to reduce risk, they do not cover all possible threats and are not a substitute for good judgment.

- Do not use the same passwords for social media that you use to access company computing resources.
- Do not follow links on posted by individuals or organizations that you do not know.
- Do not download software posted or recommended by individuals or organizations that you do not know.
- If any content you find on any social media or web page looks suspicious in any way, close your browser and do not return to that page.
- Configure social media accounts to encrypt communications whenever possible. Facebook, Twitter and others support encryption as an option. This is extremely important for roaming users who connect via public wi-fi networks.
- Tudor Rose may employ technical controls to provide reminders, monitor, and enforce these guidelines.

Breach of this Policy
Breach of this policy may result in disciplinary action up to and including dismissal. Any member of staff suspected of committing a breach of this policy will be required to co-operate with our investigation, which may involve handing over relevant passwords and login details.

You may be required to remove any social media content that we consider to constitute a breach of this policy. Failure to comply with such a request may in itself result in disciplinary action.

Employee development

Employee development

INDUCTION

When a new employee begins their career at Tudor Rose it is imperative that they are properly inducted into the Company. This will help the new starter to familiarise themselves with the Company and its processes as well as to meet their colleagues and have a full understanding of what is expected from them.

Starting a new job is daunting to most people so, by following a structured induction process, new starters should settle into their new roles easily. An induction should take place in the first days of starting with Tudor Rose. It is the responsibility of the employee's line manager to ensure that a structured induction programme is in place before the employee's start date.

To assist the line manager with this, a company-wide induction schedule has been created and a final department-specific module agenda is recommended, covering each division of the Company. For jobs that don't directly fit into any of these specific areas, the template should be adjusted accordingly. At the line manager's discretion, the first day of employment can be set aside for pure office and company familiarisation with no planned meetings. In this scenario, the line manager should make the appropriate changes to the set schedule.

HR will assist the line manager with the administrative and organisational elements of the induction process, but the responsibility for the process sits with the line manager. The line manager must check that participants are available to meet the new employee on the specified date and ensure that all participants are given at least one week's notice of their meeting time. In the event that a participant cannot attend, the line manager can elect to switch the schedule or request that an alternative individual hosts the meeting.

It should be noted that the induction meetings are intended to provide the new employee with a broad understanding of the Company and its products and services. The individual meetings must ensure that the new employee is given a detailed and balanced view of their department and its activities as well as highlighting how they will be interacting with other company departments or individuals.

Induction folder
Together with holding critical discussions with the new employee on their first day of working at Tudor Rose, line managers must also present and hand over a complete induction folder. Induction folders are available from HR and should contain the following items:

- Induction schedule
- Company telephone list
- Company handbook if not already provided.

TRAINING

Tudor Rose recognises that employees are the Company's most important resource and it is only through the continuing development of its employees that the business will realise its full potential

Training needs will be identified in a number of ways including:

- Analysis of business needs and objectives as detailed in the Company vision document.
- The annual review of a Personal Development Plan (PDP).
- Performance-related needs and opportunities at an individual level.
- Training and development requests from the employee.

In addition to the initial induction and three-month probationary review, employees will normally have an annual PDP during which development needs will be discussed. additionally, the appraisal is intended to encourage employee input in areas such as how to improve individual and business performance.

Sharing of goals and objectives is fundamental to an employee's achievement. Such discussions are intended to be informal and beneficial for both the employee and the Company. however, they do not replace essential regular communication between employee and line manager.

Employee development

It is good practice to set learning or training objectives and outcomes in advance of any training or development so that outcomes and the effectiveness of the activity may be reviewed.

Training and development is an investment which benefits the Company as well as the employee. Therefore in some cases such development may be subject to a training agreement.

In all cases, training and development will be made available to all, ensuring equal opportunity and access in line with business needs.

COMMUNICATIONS

Tudor Rose promotes and encourages effective communications. Shared goals, shared aims and shared effort are all key to the success of any business, and communications are a key part of their achievement.