

# Barter Hill Partnership Limited

## Anti-Bribery and Corruption Policy

### Statement

Barter Hill Partnership Limited is committed to conducting business fairly, and honestly both in the UK and internationally. We operate a zero-tolerance approach towards bribery and corruption in any part of our operations.

Bribery is defined as a promise, offer or gift (financial or otherwise) made to induce the improper performance of a function or activity. Examples of this include:

- Offering a potential client a gift, such as a weekend away, in exchange for doing business with us.
- A client offering you a gift or extravagant hospitality in return for a reduced price on our services.

To uphold this commitment, the Company has implemented the following systems to counter bribery:

- Periodical risk assessments will be documented to assess the levels of risk the Company is exposed to in its business, particularly in relation to business development activities.
- A clear entertainment and expenses policy that sets out that only reasonable hospitality and gift giving expenses will be accommodated by the Company and should not induce either party to contract.
- All new employees will be made aware of the provisions in place to prevent, detect and report bribery.
- The Company has a whistle-blowing policy in place, which can be found in the Employee Handbook. If you are concerned that bribery has occurred, may occur or is likely to occur we would encourage you to report your concerns.
- If you suspect, or if you are asked to accept or offer a bribe you must report this immediately to a Director. The Company values a proactive anti-bribery stance by any employee.

As we take our obligations to prevent bribery and corruption being committed very seriously, any breach of our anti-bribery and corruption policy or procedures will be considered to be gross misconduct and may result in dismissal.

Where you have been involved in or suspected of involvement in bribery and corruption that is not connected with this Company, this may still affect your suitability for on-going employment with us.

### Gift Giving and Receiving

#### Receipt of Gifts

You are required to inform a Director about any gift received in the course of business. You must not accept or agree to receive any gift if you know or suspect it is intended as a bribe. Cash or equivalent gifts are strictly prohibited.

Under no circumstances are you permitted to request gifts of any kind from clients, potential clients, suppliers or any other third party in the course of business.

#### Giving of Gifts to Third Parties

You are prohibited from offering, promising or giving gifts to clients, potential clients, suppliers or any other third party in the course of business without the authorisation of a Director. Permission will only be given if in the circumstances the gift is reasonable in nature, value and timing. Cash or equivalent gifts are strictly prohibited. Where the giving of a gift is permitted, it must be given openly and be appropriately recorded in the Company Accounts.



# Barter Hill Partnership Limited

## Anti-Bribery and Corruption Policy

### Hospitality

With authorisation from a Director, you may offer or give hospitality in the Company name providing the following are complied with:

- It does not exceed the value determined by the Director.
- It is reasonable in nature, value and timing.
- It is not promised, offered or given to influence a third party to enter into business with us or to give us a business advantage.
- It is given openly.
- It does not occur frequently between the parties.

You may only accept hospitality where authorised to do so by a Director. Authorisation will only be given where the level of hospitality is proportionate, appropriate and justifiable in the circumstances. Acceptance of hospitality at events which take place during the working day will also be subject to our business needs. You must ensure that by accepting hospitality you do not place, potentially place, or give the appearance of placing the Company in a position where a business advantage is expected to be given by us in return. You must not accept hospitality where you know, believe or suspect that it is intended as a bribe. Under no circumstances are you permitted to request hospitality in the course of business.

Where hospitality is offered, promised, given or accepted details of this must be appropriately recorded by email to a Director. Hospitality will be monitored by the Directors and the provision and acceptance of hospitality will be kept under review.

### Donations

This Company does not make contributions of any kind to political parties, causes or politicians. Nor do we make charitable donations where these would create a conflict, real or perceived, with our business interests. You are prohibited from offering, promising or giving political or charitable donations for the purpose of obtaining business or a business advantage for this Company.



# Barter Hill Partnership Limited

## Anti-Slavery Policy

### Statement

Barter Hill Partnership Limited has a zero-tolerance approach to slavery and is committed to preventing acts of slavery and human trafficking from occurring within both its business and supply chain. It is expected that all suppliers, contractors and other business partners will uphold these same high standards.

**We have ensured due diligence in our processes, by:**

- Ensuring our employees are aware of the Modern Slavery Act, including the definitions of slavery and human trafficking by providing Modern Day Slavery Awareness training.
- Advising staff what to do if they suspect a case of slavery or human trafficking.
- Actively reviewing our Whistleblowing Policy.

**These procedures are designed to:**

- Identify and assess potential risk areas in our business and supply chains.
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.
- Monitor potential risk areas in our business and supply chains.
- Provide adequate protection for whistle-blowers.

We have a zero tolerance to slavery and human trafficking and require all those in our supply chain and contractors to comply with our values and adopt the same zero tolerance approach. This is communicated to them at the outset of our business relationship and is regularly reinforced thereafter. We may cease to work with individuals and organisations working on our behalf if they do not comply with our approach.

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes the company's slavery and human trafficking statement for the present financial year.



# Barter Hill Partnership Limited

## Environmental Policy

### Statement

Barter Hill Partnership Limited is committed to the care of the environment, prevention of pollution and efficient use of natural resources. This is not just a statement but is a commitment throughout our organisation. We actively seek to:

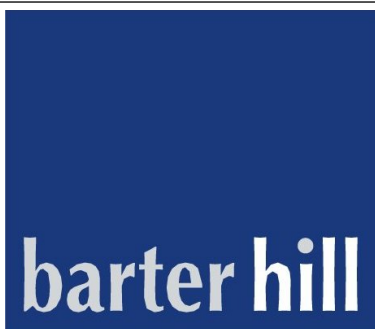
- Practice effective prevention of pollution in accordance with a hierarchy giving top priority to water recycling, electricity usage, the elimination or reduction of wasteful practices, and review of our supply chain activities.
- Provide clear communication to our employees ensuring that they have ongoing information and training and through this, encourage effective participation in reducing carbon emissions both in the workplace and domestically.
- Maximise energy efficiency throughout our operation and with our customers.
- Identify, quantify, and continually improve the environmental impact of the company using improvement programmes, demonstrated by measures and targets under continual review.
- Work closely with our clients, suppliers, local communities and the public in regard to our environmental policies and objectives.
- To prove our commitment, management systems are implemented to meet the requirements of ISO14001:2015.

At a minimum we will comply with all relevant legislation, customer or other identified requirements but we will strive for continual improvement in our prevention of pollution and efficient use of natural resources.

This policy provides a framework for setting and reviewing the company's environmental objectives. It is communicated to all employees and made available to interested parties on request.

The systems defined have our active full support. They are under continual review and improvement, however once defined are mandatory for all personnel.

This policy will be reviewed and updated as necessary, particularly in respect of major changes within the company and/or changes in legislation and we will bring these changes to the attention of all employees.



# Barter Hill Partnership Limited

## Equal Opportunity Policy

### Statement

Barter Hill Partnership Limited is committed to eliminating discrimination and encouraging diversity amongst our workforce. Our aim is that each employee feels respected and is valued based upon their skills, performance and commitment.

It is the continuing policy of the Company to provide equal employment opportunities to all employees without regard to the actual or perceived protected characteristics referenced below. Barter Hill Partnership Limited is committed to treating all employees fairly, and no employee will be treated less favourably due to their own protected characteristics or their association with someone who has a protected characteristic.

#### Protected characteristics

- Age
- Disability
- Gender Reassignment
- Marriage and Civil Partnership (applies only to someone who personally has this characteristic)
- Pregnancy and Maternity
- Race (including ethnic origin, colour, citizenship, nationality, and national origin)
- Religion or Belief
- Sex
- Sexual Orientation

People will be judged solely on merit and ability during recruitment, selection, training, development and promotion throughout their employment.

#### Third party harassment

Barter Hill Partnership Limited values all employees equally, and takes the harassment of any employees by a third party during the course of employment very seriously. We are committed to taking all reasonably practicable steps to prevent third party harassment from occurring.

#### Fair treatment

All employees whether full-time, part-time or temporary, will be treated fairly and with respect. This policy applies to all employment decisions, including those in connection with:

- Recruitment, selection, promotion and advertisement of jobs
- Terms and conditions of employment
- Training, career development and progression
- Grievance and disciplinary procedures
- Performance
- Relationships between members of staff
- Treatment of employees when their contract ends.

#### Enquiries About Disability and Health During Recruitment

As an equal opportunities employer, Barter Hill Partnership Limited does not ask about an applicant's health or whether they have a disability before offering employment or before including them in a selection pool, except



# Barter Hill Partnership Limited

## Equal Opportunity Policy

where permitted by law.

Pre-employment health enquiries will only be made under the following circumstances:

- To determine whether reasonable adjustments are needed for the applicant to participate in the recruitment process (e.g. during interviews or assessments).
- To assess whether the applicant can carry out a function that is essential to the role.
- To monitor the diversity of applicants in line with our equal opportunities' commitments.

Where appropriate, applicants may be asked to complete a pre-employment health questionnaire after a conditional offer has been made; to help us identify any adjustments or support they may need to work safely and effectively with us.

### **Promotion of equal opportunities and observance of the policy**

Each employee of Barter Hill Partnership Limited has an obligation to promote an equal opportunity environment within the Company. As our employee, you have a duty to observe and apply this policy at all times.

In particular you must not:

- Discriminate against or harass colleagues, other employees or job applicants.
- Discriminate against or harass visitors, clients, suppliers, consultants, or contractors.
- Discriminate against or harass members of the public in the course of your duties, irrespective of whether such conduct occurs on company premises.
- Induce, or attempt to induce, others to practise unlawful discrimination.
- Victimise individuals who have made allegations or complaints of discrimination or provided information about such discrimination.

Violation of this policy is a serious offence and could result in disciplinary action and/or summary dismissal.

The Directors will, with the assistance and co-operation of Associate Directors and other employees, take steps to ensure compliance with this policy. This will include regular reviews of equality issues, monitoring activities and complaints. All employees of the Company will also receive adequate training on the correct operation of this policy.

To ensure effective operation of this policy and for no other purpose, Barter Hill Partnership Limited will maintain records relating to sex, race, ethnic origin, and disability information of employees and job applicants. From time to time, it may seek the co-operation of employees in updating these records. Where necessary, employees will be able to check/correct their own record of these details. Otherwise, access to this information will be strictly restricted.

If you feel that you have been treated in a manner that is not in accordance with this policy, please initially raise the matter with your manager. The Company takes such matters seriously and aims to resolve any complaints in accordance with its grievance procedure. If there is a good reason as to why you are unable to raise this matter initially with your manager, please contact the Practice Business Manager or a Director in relation to your complaint. All complaints will be treated seriously and, where possible, in confidence. For further details please refer to the grievance procedure which can be found in the Employee Handbook.



# Barter Hill Partnership Limited

## Health & Safety Policy

### Statement

Barter Hill Partnership Limited recognises its duties under the Health and Safety at Work Act 1974 and the accompanying protective legislation. We will endeavour to meet the requirements of this legislation to ensure that we maintain a safe and healthy working environment. We are committed to the prevention of injury and ill health and this policy is communicated to all staff to ensure they are aware of their responsibilities and take all reasonable precautions to ensure the safety, health and welfare of those who may be affected by our undertaking.

Barter Hill Partnership Limited recognises so far as is reasonably practicable its responsibility to ensure the following:

- A safe place of work, safe systems of work, safe equipment and a healthy and safe working environment are provided and maintained.
- Necessary information, instruction, training and supervision are provided to ensure the health and safety of all employees at work.
- Competent Health and Safety advice is readily accessible to ensure awareness of legislative changes.
- The Health, Safety and Welfare of visitors and members of the public who may be affected by our activities are safeguarded.
- Hazards are identified, and regular assessments of risks are undertaken.
- All necessary human and financial resources are provided to enable the implementation of this policy.

At a minimum we will comply with all relevant legislation, customer requirements or other applicable obligations. However, we are committed to the continual improvement of our Health and Safety management and performance.

This policy provides a framework for setting and reviewing the company's Health and Safety objectives, it is communicated to all employees and is available to interested parties upon request.

The systems defined have our active full support. They are subject to continual review and improvement, however once defined they are mandatory for all personnel.

This policy will be reviewed and updated as necessary, particularly in respect of major changes within the company and/or changes in legislation. Any updates will be communicated to all employees.

### Statement

Barter Hill Partnership Limited is a company of Consulting Engineers undertaking Structural and Civil Engineering projects nationwide from our offices in Norfolk and Essex, serving both public and private sector clients.

We want all our clients to receive products they are delighted with, and to experience a level of service that meets or exceeds their needs and expectations. We will achieve this by:

- Maintaining good internal organisation and two-way communication.
- Always respecting our clients.
- Ensuring we understand what our customers want and expect from us.
- Making sure our staff are properly trained, confident, and effective undertaking their work.
- Using materials and equipment that are fit for purpose.
- Adhering to regulatory and statutory requirements, as well as the ISO9001:2015 standard.

We want all our staff to be proud of what they do and be proud to be part of Barter Hill Partnership Limited. We also aim to ensure they work safely and are mindful of the health and safety of their colleagues and others who may be affected by their actions.

**We are committed to improve year on year, and to support this, we will:**

- Use this policy to set ourselves challenging objectives and review our progress throughout the year.
- Regularly review our Quality Management System and this policy.

We will ensure this Quality Policy, and our objectives are communicated to, and are understood by, everyone working for or on behalf of, Barter Hill Partnership Limited.