

COLIN TOMS AND PARTNERS LLP/  
CTP CONSULTING ENGINEERS INTERNATIONAL LIMITED

DATA PROTECTION POLICY AND PRIVACY POLICY

### GDPR Information

For the purposes of the General Data Protection Regulation ("GDPR") and UK data protection laws, the controller is Colin Toms and Partners LLP, of Registered Office Suffolk House, 154 High Street, Sevenoaks, Kent, TN13 1XE.

### Privacy Policy

The Privacy Policy governs the manner in which Colin Toms and Partners LLP (t/a CTP Consulting Engineers)/CTP Consulting Engineers International Limited collects, uses, maintains and discloses information collected from users (each, a "User") of the <http://ctp-llp.com> ("Site"). This privacy policy applies to the Site and all products and services offered by Colin Toms and Partners LLP.

### Personal Identification Information

We may collect personal identification information from users in a variety of ways including, but not limited to, when Users visit our site, subscribe to the newsletter, fill out a form, and in connection with other activities, services, features or resources we make available on our Site. Users may be asked for, as appropriate, name, email address, mailing address, telephone number and mobile number.

We will collect personal identification information from Users only if they voluntarily submit such information to us. Users can always refuse to supply personally identification information, except that it may prevent them from engaging in certain Site related activities.

### Non-personal Identification Information

We may collect non-personal identification information about Users whenever they interact with our Site. Non-personal identification information may include the browser name, the type of computer and technical information about Users means of connection to our Site, such as the operating system and the Internet service providers utilised and other similar information.

### Web Browser Cookies

Our Site may use "cookies" to enhance User experience. User's web browser places cookies on their hard drive for record keeping purposes and sometimes to track information about them. User may choose to set their web browser to refuse cookies or to alert you when cookies are being sent. If they do so, note that some parts of the Site may not function properly.

### How we use Collected Information

*To personalise User experience.* We may use information in the aggregate to understand how our Users as a group use the services and resources provided on our Site.

*To send periodic emails.* The email address Users provide, will be only be used to respond to their inquiries, and/or other requests or questions. If User decides to opt in to our mailing list, they will receive emails that may include company news, updates, related product or service information etc. If at any time the User would like to unsubscribe from receiving future emails, we include detailed unsubscribe instructions at the bottom of each email.

## **How we protect your Information**

We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorised access, alteration, disclosure or destruction of your personal information and data stored on our Site.

## **Sharing your Personal Information**

We do not sell, trade or rent Users personal identification information to others. We may share generic aggregated demographic information not linked to any personal identification information regarding visitors and users with our business partners, trusted affiliates and advertisers for the purposes outlined above. We may use third party service providers to help us operate our business and the Site or administer activities on our behalf, such as sending out newsletters or surveys. We may share your information with these third parties for those limited purposes provided that you have given us your permission.

## **Third Party Websites**

Users may find advertising or other content on our Site that link to the sites and services of our partners, suppliers, advertisers, sponsors, licensors and other third parties. We do not control the content or links that appear on these sites and are not responsible for the practices employed by websites linked to or from our Site. In addition, these sites or services, including their content and links, may be constantly changing. These sites and services may have their own privacy policies and customer service policies. Browsing and interaction on any other website, including websites which have a link to our Site is subject to that website's own terms and policies.

## **Changes to this Privacy Policy**

Colin Toms and Partners LLP has the discretion to update this privacy policy at any time. When we do, we will revise the updated date at the bottom of this page. We encourage Users to frequently check this page (which appears on our company's website) for any changes to stay informed about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this privacy policy periodically and become aware of modifications.

## **Your acceptance of these Terms**

By using this Site, you signify your acceptance of this policy. If you do not agree to this policy, please do not use our Site. Your continued use of the Site following the posting of changes to this policy will be deemed your acceptance of those changes.

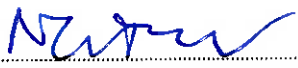
## **Contacting Us**

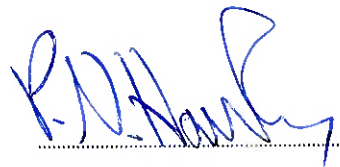
CTP Consulting Engineers – Suffolk House, 154 High Street, Sevenoaks, Kent TN13 1XE UK


Telephone No: 01732 740195

Email Address: [info@ctp-llp.com](mailto:info@ctp-llp.com)

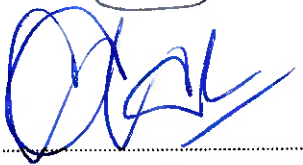
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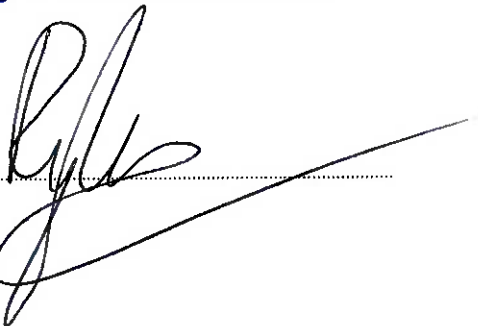
  
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19 January 2024

COLIN TOMS AND PARTNERS LLP/  
CTP CONSULTING ENGINEERS INTERNATIONAL LIMITED  
ANTI-BRIBERY POLICY

### Definition

Bribery is the accepting of gifts, money, hospitality or other favours in return for providing something of value to the briber. The purpose of this policy is to set out the rules that must be followed in this organisation to ensure that no bribery occurs.

### Unacceptable behaviour

The following behaviour is unacceptable, and must not occur in this organisation:

- accepting any financial or other reward from any person in return for providing some favour
- requesting a financial or other reward from any person in return for providing some favour
- offering any financial or other reward to any person in return for providing some favour.

### Business gifts

From time to time, customers, suppliers or other persons might offer a gift to an employee. This could be a small item, for example some chocolate, a mug or something of considerable value.

Small items must be reported to your line manager. Any gift deemed to be a value of over £20 must be refused on an individual basis. CTP will accept corporate business gifts, which must be registered and recorded with the Partners.

### Hospitality

From time to time, customers, suppliers or other persons might invite an employee to a hospitality event. All such invitations must be reported to a Partner. Permission must be given by a Partner before an employee accepts any invitation.

### Offering hospitality

This organisation occasionally runs hospitality events, primarily aimed at networking with Clients and other professionals. An employee must not organise any additional hospitality event without seeking authority from a Partner.

### Responsibilities of the head of department

The Partners are responsible for ensuring that all their employees are aware of this policy, and fully understand the rules in relation to the acceptance of gifts and hospitality.

### Attempts to bribe

Any employee who is concerned that he or she is potentially being bribed should report this matter to a Partner immediately.

Any employee found to have offered or accepted a bribe will face disciplinary action which could include dismissal for gross misconduct.

If an employee is concerned that acts of bribery are occurring in the organisation they should inform a Partner in the first instance. If this course of action is inappropriate, the employee should inform another senior manager who is able to take the matter up with a Partner.

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19 January 2024

COLIN TOMS AND PARTNERS LLP/  
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ANTI-BRIBERY STATEMENT

The Company is committed to applying the highest standards of ethical conduct and integrity to its business activities in the UK and overseas. When acting on behalf of the Company you are responsible for maintaining the Company's reputation and for conducting business honestly and professionally.

The integrity and reputation of the Company depends on the honesty, fairness and integrity brought to the job by everyone associated with the Company.

The Company will not tolerate any form of bribery, whether direct or indirect, by, or of, its employees, officers, agents or consultants or any persons or companies acting for it or on its behalf.

The Directors and senior management are committed to implementing and enforcing effective systems throughout the Company to prevent, monitor and eliminate bribery, in accordance with its obligations under the Bribery Act 2010.

The Company's Anti-Bribery Policy outlining its position on preventing and prohibiting bribery is available at on the intranet

The Company's Anti-Bribery procedures apply to all employees, as well as agency workers, consultants and contractors both in the UK and overseas.

All employees and any other individuals acting on behalf of the Company are required to familiarise themselves with and comply with the Company's Anti-Bribery Procedures.

A bribe is defined as a financial advantage or other reward that is offered to, promised to, given to, or received by an individual or company to induce or influence that individual or company to perform its public or corporate functions or duties in an improper manner (ie not in good faith, not impartially, or not in accordance with a position of trust).

All employees and any other person acting on behalf of the Company are prohibited from offering, giving, soliciting or accepting any bribe, whether cash or other form of inducement to or from any person or company in order to gain any commercial, contractual or regulatory advantage for the Company in a way which is unethical or in order to gain any personal advantage, monetary or otherwise, for themselves or anyone connected with them.

The Company will continue to provide bona fide hospitality to clients and incur promotional expenditure. However, all such expenditure must be transparent, proportionate, reasonable and authorised in advance, in accordance with the Company's anti-bribery procedures.

In the course of providing services to clients, or in dealings with suppliers, or any other person having similar connections to the Company, employees should under no circumstances accept money, gifts or other forms of reward without prior consent from a Partner. All such reported gifts shall be recorded.

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to a Partner before proceeding.

Any breach of the Company's Anti-Bribery procedures will normally be treated as Gross Misconduct.

Employees should also note that bribery is a criminal offence.

The Company will not conduct business with third parties including clients, suppliers, agents or representatives who are not prepared to support its anti-bribery objectives.

The Company depends on all employees, and those acting for the organisation, to assist in the prevention of bribery. Therefore, all employees and others acting for, or on behalf of, the Company are expected to report any suspected bribery to the Company following the Company's Anti-Bribery procedures.

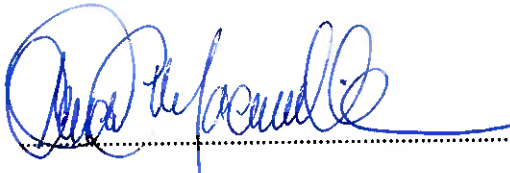
All employees will receive the support of the Company if they report of suspected bribery in good faith even if, following an investigation, it is found that no bribery took place.


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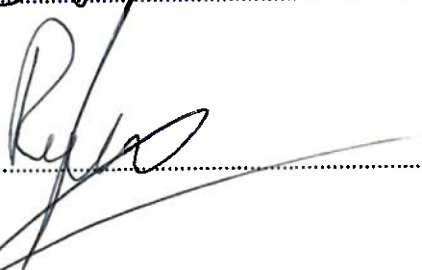
  
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COLIN TOMS AND PARTNERS LLP/  
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ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

1. Policy statement

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. Responsibility for the Policy

- 2.1 The Partners have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 2.2 The Partners have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
- 2.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Partners.



### 3. Compliance with the Policy

- 3.1 You must ensure that you read, understand and comply with this policy.
- 3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 You must notify your Manager or a Partner as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- 3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 3.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your Manager or a Partner as soon as possible.
- 3.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager.
- 3.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform a Partner immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found on the Intranet and attached to your Contract of Employment.

### 4. Communication and awareness of this Policy

Communication of this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and training will be provided as necessary.

- 4.1 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

### 5. Breaches of this Policy

- 5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

- 5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

*Affirmed by the Partners*

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COLIN TOMS AND PARTNERS LLP/  
CTP CONSULTING ENGINEERS INTERNATIONAL LIMITED

BEHAVIOURAL SAFETY POLICY

The safety and well-being of our employees, contractors, and visitors are of the utmost importance to our organization. Colin Toms and Partners/CTP Consulting Engineers International Limited are committed to providing a safe and healthy work environment for all. This policy outlines our expectations for safe behaviour and the actions we will take to promote and maintain a safe work environment.

Policy Statement

All employees, contractors, and visitors are expected to conduct themselves in a manner that promotes safety and health at all times while on company property or conducting company business. All incidents, near-misses, and hazards must be reported immediately to the appropriate supervisor or safety representative.

Behavioural Safety System Elements:

- Leadership commitment and involvement: This involves senior management actively promoting and supporting the behavioural safety program.
- Risk assessment: This involves identifying and assessing the risks associated with specific tasks or activities in the workplace.
- Training and communication: This involves providing employees with the knowledge, skills, and tools they need to work safely, as well as regular communication about safety issues.
- Observation and feedback: This involves observing employees performing tasks or activities and providing them with feedback on their safety performance.
- Incident investigation: This involves thoroughly investigating any incidents that occur in the workplace in order to identify the root cause and take action to prevent similar incidents from happening in the future.
- Measurement and review: This involves measuring the effectiveness of the behavioural safety program and regularly reviewing and updating it as necessary.

Management Commitment

Management is committed to providing a safe and healthy work environment and to promoting safe behaviour. Managers and supervisors are responsible for setting a positive safety example and for ensuring that their teams are aware of and comply with this policy.

### Employee Responsibilities

All employees have a responsibility to:

- Take reasonable care for their own health and safety and that of others who may be affected by their actions or omissions.
- Follow all safety procedures and use personal protective equipment as required.
- Report all incidents, near-misses, and hazards to their supervisor or safety representative as soon as possible.
- Attend all required safety training and participate in safety meetings.
- Take an active role in the identification and control of hazards.
- Cooperate with management in the implementation of this policy.

### Contractor Responsibilities

All contractors have a responsibility to:

- Comply with all safety procedures and use personal protective equipment as required.
- Report all incidents, near-misses, and hazards to the company's supervisor or safety representative as soon as possible.
- Attend all required safety training and participate in safety meetings.
- Take an active role in the identification and control of hazards.
- Cooperate with the company's management in the implementation of this policy.

### Visitor Responsibilities

All visitors have a responsibility to:

- Comply with all safety procedures as directed by the company.
- Report any incidents, near-misses, or hazards to the company's supervisor or safety representative as soon as possible.
- Take an active role in the identification and control of hazards.
- Cooperate with the company's management in the implementation of this policy.

### Enforcement

Violations of this policy will be dealt with promptly, appropriately and may result in disciplinary action, up to and including termination of employment or termination of a contract.

### Implementation

This policy will be communicated to all employees, contractors, and visitors and will be posted in a prominent location.

Periodic reviews will be conducted to ensure that this policy is current and effective in promoting a safe work environment.

### Human factors

Our organisation will analyse and assess the human factors (or human errors) within the context of our safety management system and will take into account the role that individuals play in the occurrence of safety incidents. We understand that people make mistakes and that these mistakes can have serious consequences in a workplace setting. In order to address the human factor in our behavioural safety policy outlined above, the following actions can be taken:

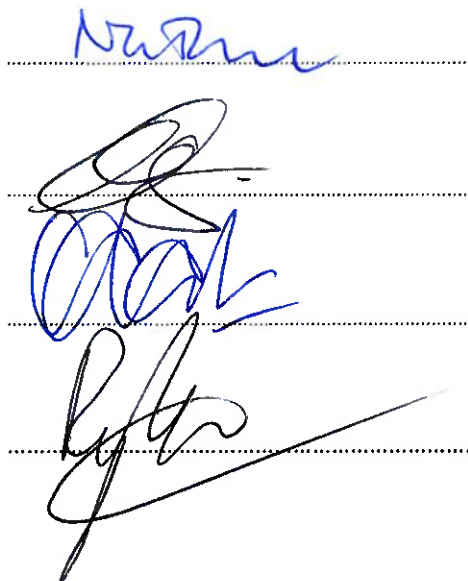
- Encourage employees to report incidents, near-misses, and hazards immediately to their supervisor or safety representative. This allows for quick identification and correction of potential hazards before they lead to an incident.
- Provide regular training on safety procedures and the identification and control of hazards. This helps to ensure that employees are aware of the potential risks in their work environment and how to mitigate them.
- Promote a positive safety culture. A culture where safety is valued and emphasized can help to reduce the likelihood of human error.
- Encourage active participation in safety meetings, audits and inspections to foster a sense of ownership and accountability in employees.
- Implement a system of rewards and recognition for employees who demonstrate safe behaviours, it will help to reinforce the importance of safety in the workplace.
- Encourage management to lead by example, by modelling safe behaviours and promoting safety throughout the organization.
- Implement a system of investigations in the event of an incident to identify the root causes, including human factors and take corrective actions to prevent recurrence.

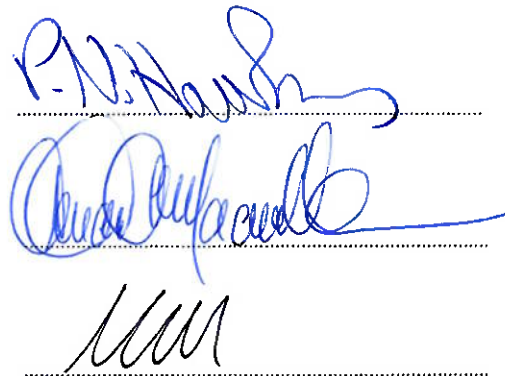
It is worth noting that, while addressing the human factor is important, it is also important to recognize that the work environment, equipment, and procedures can also contribute to

As with all other components of our safety management system, we will regularly monitor and refine our behavioural safety policy and approach in order to achieve and maintain the following objectives:

- **Improve safety performance:** By focusing on the human factors that contribute to incidents, a behavioural safety system can help to improve overall safety performance and reduce the number of incidents and injuries in the workplace.
- **Increase employee engagement:** By involving employees in the identification and control of hazards, a behavioural safety system can increase employee engagement and ownership of safety in the workplace.
- **Promote a positive safety culture:** A behavioural safety system can help to promote a positive safety culture, where safety is valued and emphasized, which can lead to a reduction in human error and an increase in safe behaviours.
- **Cost-effective:** Implementing a behavioural safety system can be a cost-effective way to improve safety performance and reduce the number of incidents and injuries in the workplace.
- **Compliance:** In the UK, workplaces are required to comply with health and safety regulations. A behavioural safety system can help organizations to meet these regulations and avoid penalties for non-compliance.
- **Business continuity:** A safe working environment is essential for the continuity of the business operations, and a behavioural safety system helps to ensure that the organization is able to continue to operate safely, even in the face of unexpected events.

*Affirmed by the Partners*





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COLIN TOMS AND PARTNERS LLP/  
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INFORMATION TECHNOLOGY (IT) POLICY

**Purpose and Scope:**

This Information Technology (IT) Policy outlines the guidelines and procedures for the use, management, and protection of information technology resources within Colin Toms and Partners LLP/CTP Consulting Engineers International Limited. The policy applies to all employees, contractors, and third-party users who have access to Colin Toms and Partners LLP/CTP Consulting Engineers International Limited Engineers' IT infrastructure and assets.

**Acceptable Use of IT Resources:**

- 2.1 Employees are expected to use IT resources responsibly for business purposes.
- 2.2 Unauthorized access, use, or distribution of company or client data is strictly prohibited.
- 2.3 Personal use of IT resources should be minimal and shall not interfere with work responsibilities.

**Security and Access Control:**

- 3.1 Employees must protect their login credentials and report any suspicious activity immediately.
- 3.2 Access to sensitive information and systems should be limited to authorized personnel only.
- 3.3 On projects where the company has signed a Confidentiality Agreement or Non-disclosure Agreement, employees shall read such documents and abide by their restrictions.
- 3.4 Regular password changes and strong password practices are mandatory.

**Data Protection and Privacy:**

- 4.1 Employees must adhere to data protection laws and company privacy policies.
- 4.2 Confidential and sensitive information should be handled with care and shared only with authorized parties.
- 4.3 Encryption should be used for the transmission of sensitive data.

### **Software and Hardware Usage:**

- 5.1 Only authorized software and hardware should be used on company devices. Authorization by the IT Manager or a Partner.
- 5.2 Installation of unauthorized software or modification of system configurations is prohibited.
- 5.3 Regular software updates and patches should be applied to ensure security.

### **Internet and Email Usage:**

- 6.1 Internet usage should be for business-related purposes only.
- 6.2 Employees are prohibited from accessing inappropriate or malicious websites.
- 6.3 Use of company email for personal communication should be limited, and employees should exercise caution with email attachments and links.

### **Backup and Data Recovery:**

- 7.1 Regular backups of critical data should be performed to prevent data loss.
- 7.2 Employees should be aware of the data recovery procedures and report any data loss promptly.

### **Mobile Device Management:**

- 8.1 Mobile devices used for work purposes must adhere to the same security standards as other company devices.
- 8.2 Lost or stolen devices must be reported immediately to Symetri for remote wiping or tracking.

### **Incident Reporting:**

- 9.1 Any IT security incidents or breaches must be reported to the Symetri promptly.
- 9.2 Employees should not attempt to resolve security incidents independently.

### **Compliance:**

- 10.1 Employees are required to comply with all applicable laws, regulations, and company policies related to IT security and usage.

**Enforcement:**

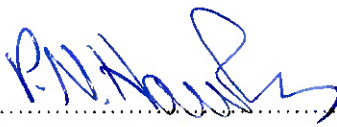
11.1 Violations of this IT policy may result in disciplinary action, including dismissal and/or legal action, if warranted.

11.2 Colin Toms and Partners LLP/CTP Consulting Engineers International Limited reserves the right to monitor and audit IT resources and use by employees to ensure compliance with this policy.

By accepting employment with Colin Toms and Partners LLP/CTP Consulting Engineers International Limited, employees acknowledge their understanding and agreement to abide by this IT Policy.

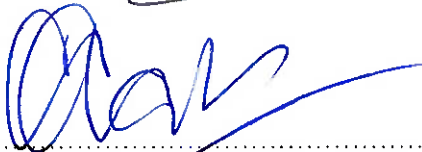
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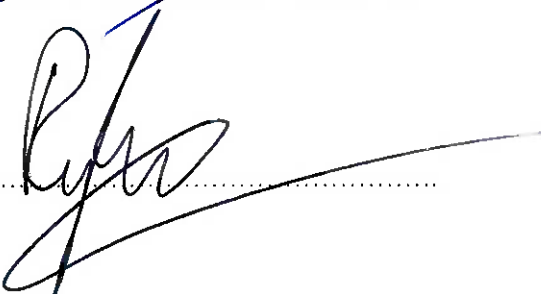
  
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EQUAL OPPORTUNITIES STATEMENT

CTP is committed to ensuring that it makes full use of the skills, experience and talents available in a multi-ethnic and diverse society and will do so regardless of race, colour, nationality, ethnic origins, sexual orientation, gender, disability or age.

We will ensure that all employees, clients, contractors and other persons that we may have dealings with in the course of carrying out our business will be treated with equal respect regardless of their race, colour, nationality, ethnic origins, sexual orientation, gender, disability or age.

We will ensure that we follow the recommendations of the Statutory Codes of Practice of both the Commission for Racial Equality and the Equal Opportunities Commission, and the Disability Rights Commission's Code of Practice in Employment and Occupation, in all of our employment policies, procedures and practices.

EQUAL OPPORTUNITIES POLICY

**Recruitment**

CTP wishes it to be known that it is an equal opportunities employer and advertises as such in any publication which involves the company.

We are committed to ensuring equality of opportunity and treatment for all persons.

Recruitment advertisements will be placed so as to ensure that all suitably qualified and experienced applicants can be aware of the vacancies and that no person or group of persons will be excluded from having the opportunity to apply for any vacancy.

No person or group of persons applying for employment will be treated less favourably than any other person or group of persons because of their colour, race, nationality, ethnic origins, religion, gender, sexual orientation, physical disabilities, age or status.

Reasonable adjustments to the working environment and/or working arrangements will be considered in the event that we are made aware of the need for this by any successful applicant.

The company, when engaging contractors and other agencies, will ensure that its commitment to equality of opportunity is fulfilled.

## As an Employer

As an equal opportunities employer, CTP will ensure equality of opportunity in the promotion, appraisal, training and development of its staff and will continue to treat each employee on the basis of their relative merits and abilities regardless of their colour, race, nationality, ethnic origins, religion, gender, sexual orientation, physical disabilities, age or status.

CTP follows the recommendations of the Commission for Racial Equality's Statutory Code of Practice on Racial Equality in Employment in all its employment policies, procedures and practices and will not tolerate direct or indirect racial discrimination, victimisation, harassment or abuse by any employee. Any substantiated case of racial discrimination, harassment or abuse by an employee will be dealt with through the Disciplinary Procedures, which may ultimately result in dismissal.

Similarly, we will ensure that we comply with all relevant legislation to ensure that no employee or customer will be treated less favourably than any other person or group of persons because of their colour, race, nationality, ethnic origins, religion, gender, sexual orientation, physical disabilities, age or status. Any contravention of this policy by an employee will result in action through the Disciplinary Procedures which may ultimately result in dismissal.

We will review annually, or more frequently when circumstances arise that require immediate action, our compliance with the Disability Discrimination Act in terms of making reasonable adjustments to the working environment and/or working arrangements for any of our employees. The company also carries out an annual accessibility audit to ensure that it is doing its utmost (within the restrictions applicable to a tenant) to address any potential problems or deficiencies relating to the office's accessibility.

## Policy Implementation

In order to ensure that the policy is being applied correctly and is achieving its stated objectives, the Partners will be responsible for periodic monitoring.

The policy will be reviewed by the Partners annually or more frequently if legislative or other changes are introduced before the annual review date. The latest review of this policy was carried out on 13 April 2017.

The policy is formally communicated to all employees as part of their induction and is also available on the company's intranet site. Guidelines, for ensuring compliance with the policy, form part of the Office Procedures manual which is issued to all employees as part of their induction process.

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HARASSMENT AND BULLYING POLICY

CTP recognises that all members of its staff have a right to work in an environment in which the dignity of individuals is respected and which is free from harassment and bullying. We are committed to eliminating intimidation in any form.

This Policy applies to harassment related to disability, gender, marital status, sexual orientation, age, creed, colour, race, ethnic origin, physical attributes or any other reason which could demean an individual.

Harassment and bullying constitute breaches of our Equal Opportunities Policy and they are classified as misconduct, which is dealt with through the Disciplinary Procedure.

This Policy applies to all staff, whether employees of the company or self-employed, who work in the company's offices.

**Definition of Harassment**

Although having no formal definition in law, harassment is generally accepted to be unwanted conduct which adversely affects the dignity of the individual at work. It may encompass unwelcome physical, verbal or written behaviour which denigrates, ridicules or is intimidatory. The essential characteristic of harassment is that the action(s) are unwanted by the recipient and have a negative effect on their general well-being.

**Definition of Bullying**

Bullying has no single definition in law but can be summarised as being the intimidation or belittling of an individual, through the misuse of power or position, which has a detrimental effect on the well-being of that individual.


**Responsibility**

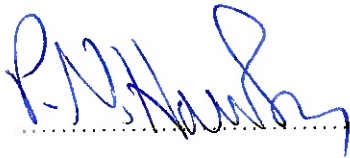
It is the responsibility of every member of staff not to knowingly harass or bully another member of staff. It is also the responsibility of every member of staff to notify their immediate manager or a Partner if they suspect that harassment or bullying is taking place within the offices of the company.

### Third Party Harassment and Bullying

This policy also covers harassment and bullying emanating from external sources (i.e. customers, suppliers, business contacts etc.). All such instances should be notified to the member of staff's immediate manager or a Partner so that action can be taken as appropriate.

*Affirmed by the Partners*

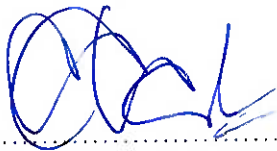
  
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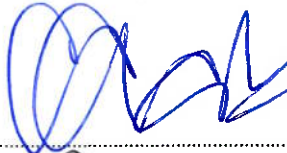
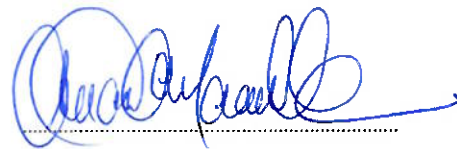

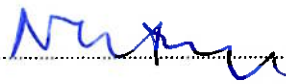
  
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19 January 2024



Employees will be regularly consulted concerning the policy and any related action plans.

*Affirmed by the Partners:*



19 January 2024

COLIN TOMS AND PARTNERS LLP/  
CTP CONSULTING ENGINEERS INTERNATIONAL LIMITED

MENTAL HEALTH POLICY

Policy Statement

1. Mental health conditions are widespread and most of us will either experience one or know someone who has experienced one. One in four adults in the UK experience at least one diagnosable mental health condition in any one year.
2. Colin Toms and Partners LLP and CTP Consulting Engineers International Limited (t/a CTP Consulting Engineers/CTP Consulting Engineers International Limited) are committed to promoting and maintaining the mental health and wellbeing of all employees through workplace practices, and encourage employees to take responsibility for their own mental health and wellbeing.
3. Mental health conditions can present in many ways and as an employer, the Company has a duty of care to employees which includes ensuring that managers have the necessary skills and knowledge to identify the early signs of mental ill health and be proactive in supporting their staff.
4. From a business perspective, the proactive management of employees' mental and physical health can produce a range of benefits, including the reduction of sickness absence, greater staff engagement and productivity, and reduced staff turnover, recruitment and costs.
5. The Company can offer a range of support from within and outside the authority to provide professional and practical help.
6. This policy and supporting documentation (Mental Health – a Manager's Guide) is a positive step towards making our company a better place to work.

## SECTION 1 – ROLES AND RESPONSIBILITIES

### Roles and Responsibilities

It is important that everyone clearly understands their roles and responsibilities within these processes.

#### **Managers' Responsibilities:**

(In addition to their responsibilities as employees):

- Ensure that all employees are made aware of this policy.
- Actively support and contribute to the implementation of this policy.
- Refer employees for assistance and support as appropriate.
- Maintaining confidentiality except for safeguarding or criminal issues where confidentiality cannot be ensured.
- Approaching issues sensitively without making moral judgements.
- Seek advice from HR Partner when required.
- Know your limitations - you are not a health professional. Ensure you have the right information to signpost employees to appropriate advice, treatment and support services.

#### **Employee Responsibilities:**

It is the employee's responsibility to:

- Understand this policy and seek clarification from management where required.
- Support fellow workers in their awareness of this policy.
- Support and contribute to the Company's aim of providing a mentally healthy and supportive environment for all employees.
- Take reasonable care of their own mental health and wellbeing, including physical health.
- Take reasonable care to ensure their actions do not affect the health and wellbeing and safety of other people in the workplace.

#### **HR Partner Responsibilities:**

- Advise managers on the consistent application of the policy.
- Provide all employees and managers with information and advice as necessary.
- Refer employees for assistance and support as necessary.
- Review the application of the policy and procedures in the light of operational experience.

## SECTION 2 - POLICY

### Purpose

The firm believes that the mental health and wellbeing of its employees is key to organisational success and sustainability. The Company aims to:

- Build and maintain a workplace environment and culture that supports mental health and wellbeing and prevents discrimination.
- Increase employee knowledge and awareness of mental health and wellbeing issues and behaviours.
- Reduce stigma around depression and anxiety in the workplace, and all forms of mental health illness.
- Facilitate employee's active participation in a range of initiatives/activities that support mental health and wellbeing.

### Who is covered by this Policy?

This Policy applies to all employees of the firm, irrespective of status and/ or grade.

### Key Principles

ACAS have stated that there are three things employers can do to help maintain the health of employees, and help those with mental health conditions to remain in work and be productive:

- **Spot the signs** – This may initially mean taking a note of what you see as you walk around or in team meetings and then choosing the right moment to intervene.
- **Engage with the problem** – There are some good practical steps you can take to help with coping strategies, and some legal requirements you need to bear in mind, for example your duty to make reasonable workplace adjustments to the working environment in certain circumstances.
- **Keeping a watching brief** – This does not necessarily mean passively observing, although in some circumstances this may be the best option. Promote awareness of mental health issues and create a culture where employees feel they can talk to you about their concerns. Keeping communication channels open is critical.

### What is Mental Health?

- Mental health is the mental and emotional state in which we feel able to cope with the normal stresses of everyday life. If we are feeling good about ourselves, we often work productively, interact well with colleagues and make a valuable contribution to our team or workplace.

- Positive mental health is rarely an absolute state. One may feel in good mental health generally but also suffer stress or anxiety from time to time. Mental ill health can range from feeling 'a bit down' to common disorders such as anxiety and depression and, in limited cases, to severe mental illnesses such as bipolar disorder or schizophrenia.
- Mental health conditions may emerge suddenly, because of a specific event or incident, or gradually, over a period of time when the condition may worsen or improve. Mental ill health is very common, with 1 in 4 experiencing a period of mental ill health during their lifetime. It is therefore essential that managers become confident in supporting staff with mental health issues.
- It is important to realise that most mental health problems are short lived. Even when people experience more serious, long-term or recurring problems, they are still able to live meaningful and satisfying lives. This may mean making some adjustments to accommodate the effects of their mental health problems.
- Although certain symptoms are common in specific mental health conditions, no two people behave in the same way when they are unwell. Many people who live with or are developing a mental health problem try to keep their feelings hidden because they are afraid of the reaction of others. Many people feel troubled without having a diagnosed or diagnosable mental health condition – although that does not mean they are not struggling to cope with daily life.
- A range of factors within and beyond the workplace can contribute to mental health conditions. Outside work, these can include bereavement, debt, family problems, addiction, relationship breakdown and housing problems. Within work - organisational change, workload, nature of relationships at work and management styles can affect an employee's mental health.

### Addressing the Stigma of Mental Health Conditions

- In recent years, National Campaigns have gone some way to removing the stigma attached to mental illness. It is important for employees to know there is no shame attached to admitting that they may have a problem. It is not a sign of weakness to report that certain aspects of work or home life are having a negative effect on an individual's wellbeing.
- The stigma associated with mental health remains a major obstacle to the effective diagnosis and treatment of mental health conditions. It can prevent employees from talking to colleagues or managers about their problems because they fear discrimination. It may even prevent them from acknowledging to themselves that they have a problem.

## SECTION 3 – PROCEDURE

- The HR Partner with the assistance of our External Consultants provide advice at any stage to managers or employees on the implementation of the policy. Managers are not expected to counsel employees or provide medical advice; indeed it would be considered inadvisable to provide unqualified counsel.
- People who experience wellbeing in the workplace perform well and are therefore more effective in their roles. It is important to remember that everyone's experience of mental ill health is different –so two people with a diagnosis of depression may have different symptoms and need different adjustments.
- If you think that an employee may have a mental health condition, their line manager or the HR Partner should attempt to speak with them in order to seek to persuade them to see their GP or Occupational Health. The most important thing is to let them know you are there to help and provide support. Not to judge them or make them do anything they feel uncomfortable about.
- Practical guidance on dealing with an employee's disclosure about a mental health problem is contained in the Mental Health Manager's Guide.

### Spotting the Early Signs

- How people are treated and managed on a day-to-day basis is central to their mental well-being and engagement. Thus, line managers have a key role in supporting well-being, spotting early signs of mental health problems and initiating early intervention. As with all medical conditions, early interventions and preventative measures have benefits for all.
- Mental health must be managed in the same way as any other medical condition. Line managers should know their team better than anyone and are therefore ideally placed to spot the early signs that someone may be mentally unwell.
- Getting it right is often a matter of common sense. A good manager will regularly ask staff how they are, take an interest in their wellbeing, communicate expectations, monitor and review workloads and be personally accessible. People with mental health issues say that having a supportive line manager makes a great difference to their working life.

### Team Members

- The manager also needs to think about the effect on other team members when one member of the team has mental ill-health. You may need to discuss with the individual concerned whether they are willing to share some information with the rest of the team. You may need to raise awareness about mental ill-health, and what you can all do to help. You may also need to deal with other members of the team feeling under additional pressure.

### Manager's Own Health

- As a manager who is managing a team member who has mental health issues, you may feel that there is a tension between your desire to support a team member and your need to ensure that work gets completed to deadlines. You may feel frustrated, or out of your depth and in need of support yourself. Managing someone with complex mental health issues may be challenging, and you may find it helpful to talk the situation through with your own line manager. Remember that you need to protect your own mental health wellbeing.

### Reasonable Adjustments

- There are a number of reasons why employers should take steps to make adjustments for people with mental health conditions. From a regulatory perspective, the Equality Act (2010) outlines an employer's duty to make reasonable adjustments for people with disabilities in order to ensure that they have the same access to everything that involves gaining or keeping employment as a non-disabled person. According to the Act, a person is defined as disabled if they have a mental or physical impairment that has a substantial long-term (i.e. more than 12 months) effect on their normal day-to-day activities. A person is also protected under the Act if they have been affected in this way in the past but have been well for some time.
- It is good practice to make adjustments that are 'reasonable' for any employee with mental health conditions, whether or not they may be covered by the Equality Act.

### Good practice for applying Workplace Adjustments

- Have an open, honest and practical conversation with the person about how their mental health condition impacts their work and what adjustments can be made.
- Ask the individual what they need – they are often the best experts of managing their condition.
- Focus on what the person can do – not what they can't.
- Tailor adjustments to the specific needs and abilities of the individual – be creative.
- Be flexible – as some mental health conditions can be episodic. It may be more helpful to agree adjustments that can be implemented as and when required and revoked when not.
- Regularly review the adjustments to ensure they are working and are still appropriate.
- Be realistic about what you can offer. If you are unsure, consult HR Partner who may consult with our External Consultants.
- With the permission of the individual communicate the adjustments to other team members to alleviate perceptions of favourable treatment.



## Managing Fatigue Risks

The company will manage the risks from fatigue and provide systems in place to prevent fatigue.

Fatigue generally refers to a perceived state of weariness caused by prolonged or intensive exertion. It is also linked to issues surrounding excessive working time or poorly designed shift patterns.

We understand that there are human performance risks (including lack of alertness and poor decision making) as well as health and safety risks (accidents) resulting from fatigue.

Employees will be expected to make good use of time off to prevent fatigue, report concerns that may lead to fatigue or adverse events and errors.

The company will:

- Measure and assess current work conditions.
- Assess the risks arising from changes in working patterns using the HSE's Fatigue and Risk index.
- Provide employees with information and training on fatigue
- Consult with staff in managing and mitigating fatigue risks
- Set limits on working hours and shift patterns
- Monitor and enforce the implementation of the limits set
- Implement the working time regulations
- Record and report incidents of fatigue
- Carry out health assessments for night workers
- Review the implemented controls.

## Practical examples of Workplace Adjustments

Being flexible and creative is important when considering solutions. Below are examples, which could act as prompts for line managers and employees exploring these issues together.

### Working Hours or Patterns

- Take a flexible approach to start/finish times and/or shift patterns in line with the Flexible Working Policy.
- Phased return to work.
- Equal amount of break time, but in shorter, more frequent chunks.
- Allow someone to arrange their annual leave so that it is spaced regularly throughout the year.
- Allow the possibility to work from home at times.
- Temporary reallocation of some tasks.

### Physical Environment

- Minimise noise – e.g. reducing pitch or volume of telephone ring tones providing office/room dividers/partitions if practical.
- Provide a quiet space for breaks away from the main workspace.
- Allow for increased personal space.
- Move workstation – to ensure for example that someone does not have their back to the door

### Support with workload

- Support someone to prioritise their work.
- Increase frequency of supervision.
- Allow the individual to focus on a specific piece of work.

### Support from others

- Provide a buddy or mentor.
- Consider mediation as an option if there are difficulties between colleagues.

## Employee Wellness Action Plan

The information in this form will be held confidentially and should be regularly reviewed by the employee and line manager. Whilst the employee only needs to provide information that they are comfortable sharing and that relates to their role and workplace, the aim is to provide support and therefore the sharing of information will aid this.

It can help the employee and manager to agree, together, how to practically support you the employee in your role and address any health needs. It is the responsibility of the manager to ensure that data gathered in this form will be kept confidential and will not be shared with anyone without the permission of the employee, the exception to this is safeguarding or criminal issues where confidentiality cannot be ensured

However, it should be recognised that some mental health issues are irregular and ill defined. The unpredictability may therefore make the completion of a plan difficult.

The employee may wish to complete the action plan themselves and then arrange a meeting to discuss. Remember it is important to choose an appropriate place – somewhere private and quiet where the person feels comfortable and equal.

### **What helps you stay mentally healthy at work?**

(For example taking an adequate lunch break away from your desk, getting some exercise before or after work or in your lunchbreak, light and space in the office, opportunities to get to know colleagues, quiet place to work).

1. What can your manager do to proactively support you to stay mentally healthy at work? (For example, regular feedback and catch-ups, flexible working patterns, explaining wider organisational developments minimising impact of unsuitable environment (heat, light, noise, etc), home working).
2. Are there any situations at work that can trigger poor mental health for you? (For example conflict at work, organisational change, tight deadlines, something not going to plan).
3. How might experiencing poor mental health impact on your work.
4. What support could be put in place to minimise triggers or to support you to manage symptoms.
5. Are there elements of your individual working style or temperament that it is worth your manager being aware of.
6. Are there any early warning signs that we might notice when you are starting to experience poor mental health.
7. What support could be put in place to minimise triggers or to support you to manage symptoms.

8. Are there elements of your individual working style or temperament that it is worth your manager being aware of.

Employee's Name \_\_\_\_\_

Employee's signature \_\_\_\_\_

Date \_\_\_\_\_


Line Manager's Name \_\_\_\_\_


Line Manager's signature \_\_\_\_\_

Date \_\_\_\_\_

Date to be reviewed \_\_\_\_\_

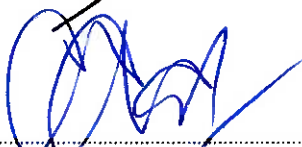
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19 January 2024

COLIN TOMS AND PARTNERS LLP/  
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WHISTLEBLOWING

The Company encourages employees to raise any concerns that they may have about any wrongdoing at any level within the business. Wrongdoing in this context means any breach of a legal obligation, risk to health and safety, a criminal offence being committed, a miscarriage of justice occurring or likely to occur, damage to the environment, or an attempt to conceal any of the above.

Any initial concern should be raised with your line manager. However, if this is not appropriate then you should contact another member of the management team who will ensure that your concern is properly addressed.

Employees who raise a concern which is in the public interest under this policy are entitled not to be subjected to any detriment as a result, however the employee must reasonably believe that the disclosure they are making is true.

Even if your concern proves to be unfounded you will be protected against any reprisals from your manager, colleagues or any other employee of the business. Making a deliberately false allegation, however, against the Company, a fellow employee or any other person will be treated as an act of gross misconduct which will usually result in dismissal.

If you are the subject of an allegation of wrongdoing then you will be informed of the allegation and given every opportunity to explain the situation and put your side of the story. Disciplinary action will only be taken following a full investigation in accordance with the disciplinary procedure.



19 January 2024

COLIN TOMS AND PARTNERS LLP/  
CTP CONSULTING ENGINEERS INTERNATIONAL LIMITED

WASTE MANAGEMENT STRATEGY

1. Recycle waste paper using Biffa (we also donate usable waste paper to local schools).
2. Recycle batteries – stored in office and , when sufficient quantity accumulated, Valpak come to collect
3. Recycle toner and inkjet cartridges (given to Charity for the Deaf).
4. Recycle cardboard (collected by Veolia Environmental Services).
5. Purchase energy efficient equipment.
6. Office lights changed to LED in 2021 and turned off at the end of the working day.
7. All computers, except servers, turned off at the end of the working day.
8. Paper usage minimized by sending drawings and other documents as electronic files rather than physical printed copies.



19 January 2024

COLIN TOMS AND PARTNERS LLP/  
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QUALITY POLICY

CTP's objective is to meet our clients' needs thus ensuring our continuing success by providing a first class and memorable service which conforms to agreed requirements.

Our policy ensures that all our work, from initial enquiry to completion, is carried out in a manner that sets and maintains the highest standards.

Implementation of this policy is the responsibility of every member of staff, starting with the Partners who are ultimately responsible for ensuring that all client requirements are fulfilled.

Our operating manual is a dynamic document that describes the policies and practices which we follow. Every member of staff is required to follow this policy and the procedures applicable to their work.

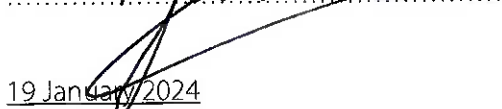
All procedures and practices, whether formally documented or otherwise, are subject to regular monitoring and updating as and when necessary to pursue our passion for excellence through continual improvement.

Our operating framework demands that activities are effectively controlled and the results are in accordance with client requirements. To ensure our objectives are met we review our activities at planned intervals.

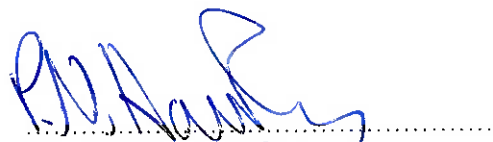
CTP are committed to maintaining a quality management framework which focuses on our clients; their satisfaction and our continual improvement, and which meets the requirements and ethos of ISO 9001:2015 and is independently certified.

We are proud that the effectiveness of our policy and objectives continues to be endorsed through the certification of our quality management system.

*Affirmed by the Partners*



19 January 2024





COLIN TOMS AND PARTNERS LLP/  
CTP CONSULTING ENGINEERS INTERNATIONAL LIMITED

HEALTH & SAFETY POLICY

General Statement of Corporate Policy

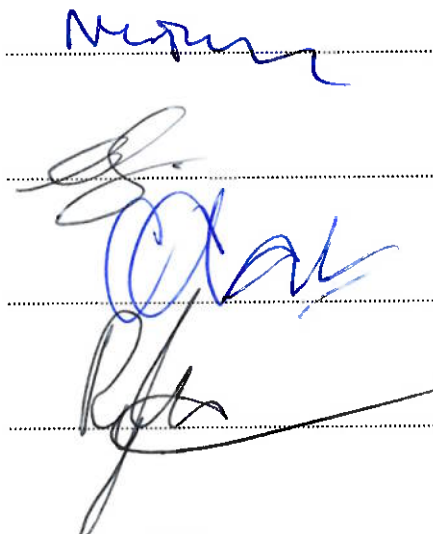
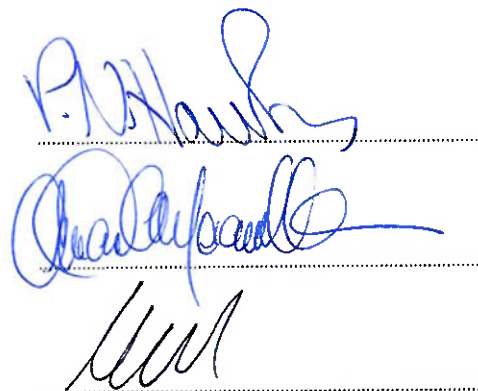
CTP's policy is to provide, so far as is reasonably possible, safe and healthy working conditions for all its employees, at whatever location they may be carrying out their duties. This policy also extends to any visitors to the company's offices.

CTP will:

- Periodically review all aspects of activity to identify hazards that have the potential to cause ill health, injury or loss.
- Provide effective Health and Safety planning, organisation, control and monitoring of preventative and protective measures to reduce the risks from identified hazards, as far as is reasonably possible.
- Provide and maintain safe premises, equipment and systems of work.
- Provide a safe and healthy working environment with adequate welfare facilities.
- So far as is possible and within their control, provide safe access to the work place.
- Consult with employees, as appropriate, prior to any introduction or change of Health and Safety procedures.
- Provide relevant training to employees to enable them to recognise and discharge their own responsibilities with regard to Health and Safety.

Employees are reminded that they are required to take reasonable care to ensure their own safety and that of other employees, also for the safety of any visitors to the company's premises, and to co-operate with the company so as to enable it to carry out its responsibilities effectively.

*Affirmed by the Partners*

19 January 2024

COLIN TOMS AND PARTNERS LLP/  
CTP CONSULTING ENGINEERS INTERNATIONAL LIMITED

ENVIRONMENTAL POLICY

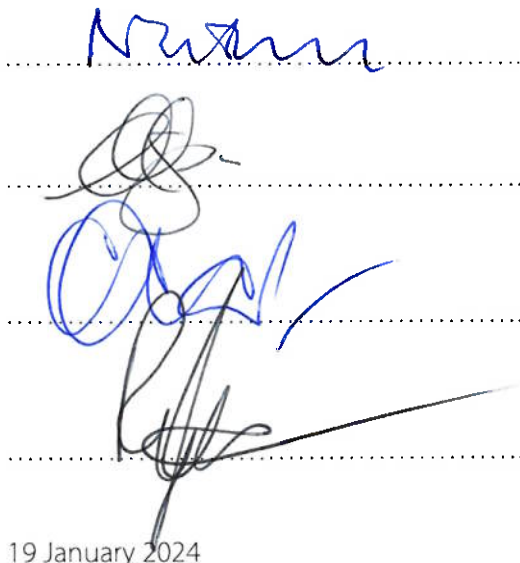
CTP's activities extend across a wide range of projects associated with the built environment. We recognise that our work can have a significant impact on the local, regional, and global environments, and we are committed to continuous improvements in environmental performance, suitable design strategies, and the prevention of pollution.

CTP operate an environmental management policy that complies with the spirit and ethos of BS EN 14001: 2015 and integrates with our Business Management System. The environmental regulations, laws, and codes of practice will be regarded as setting the minimum standards, of environmental performance.

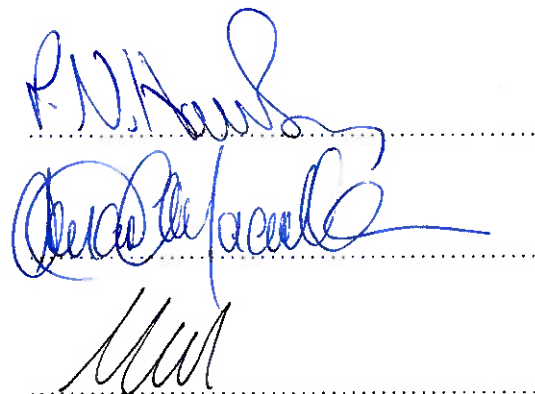
Our specific policies are to:

- Consider the overall environmental impacts of our design work.
- Consider the environmental impacts of the materials and components we specify at all stages of their life cycle.
- Encourage clients to prevent pollution and minimise the adverse effects of their decisions on the environment.
- Use environmentally safe and sustainable energy sources to meet our needs.
- Maintain a sustainable waste management strategy, including recycling material wherever practical.
- Implement our policies through guidelines and training.
- Provide appropriate resources to implement the policy.
- Evaluate our performance in implementing the policy and complying with all applicable laws and regulations.

*Affirmed by the Partners*



19 January 2024



COLIN TOMS AND PARTNERS LLP/  
CTP CONSULTING ENGINEERS INTERNATIONAL LIMITED

DRUG, ALCOHOL AND OTHER SUBSTANCE TESTING

The Company may require you to submit to drug, alcohol and/or other substance testing where there is reason to believe that you may have acted in breach of this policy.


This may include a standard breathalyser test administered by your manager. Arrangements for blood or urine testing may vary from time to time, but such tests will always be carried out by suitably qualified, independent.

An employee will be treated as having failed a drug or alcohol test if the test shows the presence of illegal drugs or a level of alcohol in excess of the drink driving limit applicable in England & Wales (80 mg of alcohol per 100 ml of blood, 35 mcg per 100 ml of breath or 107 mg per 100 ml of urine) and Scotland (50 mg of alcohol per 100 ml of blood, 22 mg per 100 ml of breath or 67 mg per 100 ml of urine).

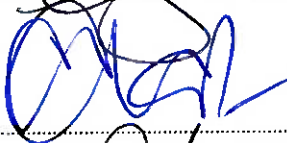
An employee who refuses, without proper excuse, to undergo a test required under this policy will be treated as having failed the test.

Whether a test needs to be conducted is a matter for the Company to decide. In cases where an employee is clearly under the influence of alcohol, drugs or other substances there is other clear evidence of a breach of this policy then disciplinary action may still be taken even if no test is carried out.

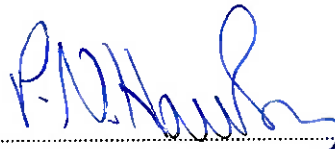
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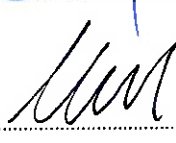












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