

CORPORATE POLICIES

SETTING NEW
STANDARDS

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Document Approval and Version Control

Policy & Revision Number	Date	Additions/Modifications	Author
Health & Safety Revision 2	9/10/2020	Amend CDM Arrangements - PC and SC compliance	Des Dobbin
Health & Safety Revision 5	06/06/2023	Covid19 review and update on CLC reference document	Des Dobbin
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Approvers	Name & Role	Signature	Approval Date
Komfort Services Senior Management	Managing Director – Mick Edwards		2/01/2024
Komfort Services Senior Management Team	Commercial Director – Russell Johnson		2/01/2024
Komfort Services Senior Management Team	Construction Director – Ray Carter		2/01/2024
Komfort Services Senior Management Team	Business Development & Transformation Director – Jamila Ibrahim		2/01/2024

This Policy was reviewed in January 2024 and was circulated to all Employees and Relevant Parties who have confirmed, they have read, understood and will adhere to them.

Senior Management Team

Statement of Intent

Aim

Komfort Services is committed to ensuring the health, safety and welfare at work of its employees so far as is reasonably practicable by fully complying with all statutory health and safety requirements of the Health & Safety at Work Act 1974 and all subsequent Regulations and by positive action to prevent work related injury and ill health and promote healthy working practices.

Komfort Services is committed to continual improvement in all areas of health and safety management and recognises its responsibility for providing a safe and healthy workplace and work environment for employees and others (contractors, visitors, public etc) who may be affected by its work or undertakings.

Objectives

To achieve this aim, Komfort Services has the following objectives:

- To provide necessary information, instruction, training and supervision to ensure the health and safety of staff and others
- To consult staff, clients and those applicable to contribute and participate in achieving business objectives and where possible improve practices and processes
- To integrate health and safety responsibilities into everyday working practices and managerial responsibilities
- To implement a monitoring system, inspection and audit process to achieve effective management of health and safety
- To minimise unavoidable risks by the use of physical control measures and issue of personal protective equipment
- To assess work activities by identification of hazards and evaluation of risks
- To minimise the risk to health through the provision and maintenance of suitable plant, buildings, facilities, equipment and the provision of safe systems of work
- To coordinate, cooperate and exchange relevant information with contractors/supply chain

Authority

Komfort Services Managing Director recognises that he has ultimate responsibility for health and safety as the Employer/Owner and has delegated operational responsibility for the implementation to the Board of Directors and through them, to the Senior Health & Safety Manager.

Employees

Each individual has a legal obligation to take reasonable care for his/her own health and for the safety of others who may be affected by his or her acts or omissions. Every employee must comply with the rules and requirements under the authority of this policy to enable compliance with statutory duties.

Competent Advisor

Komfort Services will ensure that competent persons are appointed to assist the organisation in meeting its health and safety obligations.

Review

This policy will be regularly monitored and will be reviewed and revised as necessary in the light of legislative and organisational changes.



Michael Edwards - Managing Director - 2/01/2024

ANTI BRIBERY, FRAUD & COMPETITION LAW POLICY

Anti-Bribery Policy Statement:

The following document, outlines Komfort Services Policy, with regard to Anti-Bribery, in order to ensure the company complies fully with all requirements of **The Bribery Act 2010**

It is the intention of Komfort Services to review organisational processes to introduce and maintain the following requirements under **The Bribery Act 2010**, for the following reasons:

- Komfort Services has an obligation to its customers, employees, suppliers and service providers to uphold responsible, fair business practices;
- Komfort Services, is committed to promoting and maintaining the highest level of ethical standards in relation to all its business activities;
- Komfort Services reputation for maintaining lawful business practices is of the highest priority and this Policy has been introduced to preserve these core values;
- Komfort Services has a zero-tolerance policy towards Bribery and Corruption and is committed to acting fairly and with total integrity in all of its business dealings and relationships and implementation of this policy is designed to maintain effective systems to counter Bribery and Corruption within its business activities as it affects, customers, employees and all other Interested Parties, as outlined in the **Komfort Services Quality Manual Chapters 4.2; 4.3 and 4.4;**
- Bribery of any kind is strictly prohibited. Under no circumstances should any provision be made, money set aside or accounts created for the purposes of facilitating the payment or receipt of a bribe;

Bribery Policy and Scope:

Komfort Services Anti-Bribery Policy sets out the Company's position on any form of bribery and corruption and provides guidelines aimed at:

- Ensuring compliance with anti-bribery laws, rules and regulations as outlined in the Bribery Act 2010, not just within the UK but in any other country within which the Company may carry out its business or in relation to which its business may be connected;
- Enabling Komfort Building Service employees, sub-contractors and other Interested Parties to understand the risks associated with bribery and to encourage them to be vigilant and effectively recognise, prevent and report any wrongdoing, whether by themselves or others;
- Providing suitable and secure reporting and communication channels and ensuring that any information that is reported is properly and effectively dealt with;
- Creating and maintaining a rigorous and effective framework for dealing with any suspected instances of bribery or corruption;
- This Policy applies to all permanent and temporary employees of Komfort Services, sub-contractors and other Interested Parties, as outlined in the **Komfort Services Quality Manual Chapters 4.2; 4.3 and 4.4;**
- It also applies to any individual or corporate entity associated with Komfort Services, who performs functions in relation to, or for and on behalf of, the Company, including, but not limited to, directors, agency workers, casual workers, contractors, consultants, seconded staff, agents, suppliers and sponsors; All employees and associated persons are expected to adhere to the principles set out in this Policy.

Anti-Bribery Objectives and Performance:

Komfort Services Anti-Bribery Objectives are to:

- Eliminate the possibility of potential instances of Bribery and Corruption at all levels within the Komfort Services organisation;
- Ensure that all Komfort Services employees, including sub-contractors are aware of and comply with applicable legislative and regulatory requirements;
- Maintain employee awareness of the Bribery Act 2010, by ensuring that all employees acknowledge its importance to the company and their own individual responsibilities for combating Bribery and Corruption;
- Ensure that all actual or suspected and potential breaches of the Bribery Act, are reported to and investigated by the Komfort Management Team, who has direct responsibility for maintaining this policy and providing advice and guidance on its implementation;
- Provide documentary evidence in the form of records to show that the processes are being followed correctly and completely;
- Anti-Bribery objectives are to be formally reviewed on a yearly basis as part of the Komfort Services Management Review Programme, as outlined in *Chapter 8 of the Komfort Services Quality Manual, which complies with clauses 9.3.1; 9.3.2; 9.3.3; of the BS EN ISO 9001:2015 Standard;*

Anti-Bribery Implementation Plan

To achieve our objectives, and demonstrate to customers and other interested parties, our commitment the Anti-Bribery Act 2010, the following processes will be adopted:

- Risk and Opportunities assessments are undertaken to ensure that Komfort's business requirements are not compromised by failure of the Anti-Bribery Policy;
- Risk and Opportunities assessments are reviewed on a regular basis, to ensure they consider changes to Government Legislation and Business Considerations, in order the requirements of this Anti-Bribery Policy continue to be fit for purpose;
- Policies, processes, procedures and standards are created, approved, implemented and reviewed regularly to support the policy;
- The effectiveness and efficiency of the Anti-Bribery Policy is monitored and reviewed via Internal Audits and Management Reviews;
- All Komfort employees, including Sub-contractors are made aware of this policy and the consequences for failure to comply;
- All non-conformances, actual and potential breaches of the Komfort Anti Bribery Policy are to be reported to the Komfort Management Team, who will investigate the circumstances and suitable action taken in a timely manner, which may include disciplinary action against those persons or organisations involved;

Responsibilities:

Komfort Services **Management Team** is responsible for the overall direction of and commitment to Anti-Bribery and approving this policy;

- **The Komfort Management Team** is responsible for the overall direction of and commitment to the Anti-Bribery Policy by ensuring an effective, two-way communication between Komfort Services, its Employees, including Sub-Contractors and Other Interested Parties, providing adequate resource, and monitoring and improving its effectiveness.

- **The Komfort Management Team** supported by the Quality, Environmental Responsible Person (QERP), has direct responsibility for maintaining Komfort's Anti-Bribery Policy, any associated policies, processes procedures and standards and providing advice and guidance on their implementation;
- All **Site Managers** are directly responsible for implementing the relevant policies, processes and procedures within their areas of responsibility;
- All **Komfort Services Employees, including Sub-Contractors** are responsible for ensuring that the tasks they complete, or are responsible for, follow the documented Anti-Bribery policies, processes and procedures;
- The **Komfort Management Team**, is responsible for ensuring that all employees are made aware of their Anti-Bribery Policy responsibilities through inductions, Tool box talks refreshers, awareness of the company policies on the shared system, management meetings.
- The **Komfort Management Team** are responsible to stay up to date with the law by reviewing the latest Government guidelines <https://www.gov.uk/anti-bribery-policy>
<https://www.gov.uk/government/collections/anti-corruption>

Responsibilities and Reporting Procedure:

- It is the contractual duty and responsibility of all employees and associated persons to take whatever reasonable steps are necessary to ensure compliance with this Policy and to prevent, detect and report any suspected bribery or corruption in accordance with the procedure set out in this document;

Designated Responsible Person within Organisation to report to:

Mick Edwards, Managing Director

mick@komfortservices.co.uk

- You must immediately disclose to the Company any knowledge or suspicion you may have that you, or any other employee or associated person, has plans to offer, promise or give a bribe or to request, agree to receive or accept a bribe in connection with the business of the Company;
 - For the avoidance of doubt, this includes reporting your own wrongdoing. The duty to prevent, detect and report any incident of bribery and any potential risks rests not only with the directors of the Company but equally to all employees and associated persons;
 - **Komfort Services** encourages all employees, sub-contractors and Other Interested Parties to be vigilant and to report any unlawful conduct, suspicions or concerns promptly and without undue delay so that investigation may proceed and any action can be taken expeditiously;
 - **Confidentiality** is to be maintained during the investigation to the extent that this is practical and appropriate in the circumstances;
 - **The Company** is committed to taking appropriate action against bribery and corruption. This could include either reporting the matter to an appropriate external government department, regulatory agency or the police and/or taking internal disciplinary action against relevant employees and/or terminating contracts with associated persons.

Komfort Services will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. It is also committed to ensuring nobody suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or corruption offence has taken place or

may take place in the future;

The following, outlines information on the Bribery Act 2010; this precis is not considered exhaustive and for further information reference should be made to the HM Government information on the act at the following internet web site:

<https://www.gov.uk/government/publications/bribery-act-2010-guidance>

It is an offence in the UK to:

- Offer, promise or give a financial or other advantage to another person (i.e. bribe a person), whether within the UK or abroad, with the intention of inducing or rewarding improper conduct;
- Request, agree to receive or accept a financial or other advantage (i.e. receive a bribe) for or in relation to improper conduct;
- Bribe a foreign public official;

You can be held personally liable for any such offence:

It is also an offence in the UK for an employee including sub-contractors, other interested parties or an associated person to bribe another person in the course of doing business intending either to obtain or retain business, or to obtain or retain an advantage in the conduct of business, for the Company. The Company can be liable for this offence where it has failed to prevent such bribery by associated persons. As well as an unlimited fine, it could suffer substantial reputational damage.

Other Relevant Information:

- The Company recognises that industry practices may vary from country to country or from culture to culture. What is considered unacceptable in one place may be normal or usual practice in another. Nevertheless, a strict adherence to the guidelines set out in this Policy Document is expected of all employees, sub-contractors and Other Interested Parties at all times;
- If in doubt as to what might amount to bribery or what might constitute a breach of this Policy, refer the matter to the Komfort Management Team;

Competition Law

Click on the link below for guidance on compliance and managing risks.

Training on risk management/ anti competition law is available on request from the management team and presentation on Market Abuse is saved on the shared system under 'Training Courses'

<https://assets.publishing.service.gov.uk/media/5a7e243c40f0b62302689707/CMA19.pdf>

If you have anti-competitive concerns, report them to the UK's CMA cartel hotlines.

For confidential guidance, if you have been directly involved in anti-competitive behaviour, you can call **020 3738 6833**. If you've seen price-fixing take place, you can report it on **020 3738 6888**

Fraud & Malpractice

Komfort values its reputation for financial probity and reliability and recognise that over and above any financial damage suffered, fraud may reflect adversely on the company's image and reputation. We therefore aim to limit its exposure to fraud by:

- Instituting and maintaining cost effective measures and procedures to deter fraud
- Taking firm and vigorous action against any individual or group perpetrating fraud against the Company or its customers
- Encouraging its employees to be vigilant and to report any suspicion of fraud, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately
- Rigorously investigating instances of alleged fraud and pursuing perpetrators to seek restitution and recovery of costs
- Assisting the Police and other appropriate authorities in the investigation and prosecution of those suspected of fraud

Internal Controls

We have preventative measures in place including internal controls, which are designed to prevent fraud and malpractice occurring in the first instance.

These consist of rules, regulations, policies and procedures within which employees, agency staff, consultants and contractors are expected to operate and include:

- A Code of Conduct;
- Disciplinary procedures for employees;
- Financial Principles and Regulations

It is the responsibility of all Managers' to actively deter, prevent and detect fraud and malpractice by maintaining good control systems and ensuring their staff are familiar with them.

External reporting

It is the policy of the Company to report all known criminal activity to the Police for investigation by them. The timing of Police involvement will be at the discretion of the Board of Directors.

Employees are encouraged to raise concerns about any instance of malpractice at the earliest possible stage. Any suspicion of, or if you are aware of any suspected fraud or malpractice, should be reported to your Line Manager.

Gifts from Clients/Suppliers Policy and its Corporate Hospitality Policy:

- The giving of business gifts to clients, customers, contractors and suppliers is not prohibited provided the following requirements are met:
 - The gift is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage;
 - It complies with local laws;
 - It is given in the Company's name, not in the giver's personal name;
 - It does not include cash or a cash equivalent (such as gift vouchers);

- It is of an appropriate and reasonable type and commensurate value and given at an appropriate time;
- It is given openly and not secretly;
- It is approved in advance by the Komfort Management Team;

In Summary:

- It is not acceptable 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, or to accept a payment, gift or hospitality from a third party that you know or suspect is offered or provided with the expectation that it will obtain a business advantage for them;
- Any payment or gift to a public official or other person to secure or accelerate the prompt or proper performance of a routine government procedure or process, otherwise known as a "facilitation payment", is also strictly prohibited. Facilitation payments are not commonly paid in the UK but they are common in some other jurisdictions.



Michael Edwards – Managing Director – 2/01/2024

Equality & Diversity Policy

Introduction:

Komfort Services recognises that it is essential to provide equal opportunities to all persons without discrimination. This policy sets out the organisation's position on equal opportunity in all aspects of employment, including the hire of recruitment and promotion, giving guidance and encouragement to employees at all levels to act fairly and prevent discrimination on the grounds of sex, race, marital status, part-time and fixed term contract status, age, sexual orientation or religion.

1. This policy applies:
 - To employees of Komfort Services;
 - To temporary or contract staff engaged by Komfort Services, where their services are contracted via a third party, including Sub-Contractors;
 - Irrespective of length of service or duration of contract, where it is specified in their contract.
2. All employees of Komfort are expected to comply with:
 - The terms of their Contract of Employment;
 - Komfort's Conduct and Declaration of Interests policy and;
 - Komfort's policies, procedures and financial and other regulations.

Statement of policy:

1. It is the policy of Komfort Services to ensure that no job applicant or employee, including Third Party hired employees, including Sub-Contractors, receives less favourable treatment on the grounds of sex, race, marital status, disability, age, part-time or fixed term contract status, sexual orientation or religion, or is disadvantaged by conditions or requirements that cannot be shown to be justifiable. The organisation is committed not only to its legal obligations but also to the positive promotion of equality of opportunity in all aspects of employment;
2. The organisation recognises that adhering to the Equal Opportunities Policy, combined with relevant employment policies and practices, maximises the effective use of individuals in both the organisation's and employees' best interests. Komfort Services recognises the great benefits in having a diverse workforce with different backgrounds, solely employed on ability;
3. In addition to the statement outlined in paragraph 1. above, Komfort Services will comply with the Rehabilitation of Offenders Act 1974, which gives people the right not to disclose "*spent*" offences when applying for most jobs unless those jobs are "*exempt*" from the Act.
4. Under the Act, a "*spent*" conviction or caution shall not be proper grounds for not employing someone or for dismissing them. However, if applicants do not disclose "*unspent*" convictions or cautions when asked to do so, they may be found out and dismissed on the grounds of having deceived the employer. In a few cases, they could be prosecuted.

5. In view of the type of client who uses Komfort Services and facilities the company may be contracted to work at, Komfort Services reserves the right to obtain Disclosure and Barring Services Checks on all prospective employees, including sub-contractors and consultants; this requirement must be advised to the prospective employee at the time of advertising of the position;
6. Before Komfort considers asking a prospective employee, including sub-contractors and consultants, to apply for a criminal record check through DBS, Komfort is legally responsible for ensuring we are entitled to submit an application for the job role, which may involve working at a specific location for which the client has stated a DBS Check is required. This means the Komfort Services must satisfy themselves that the position is eligible under the current legal provisions before authorising an application to the DBS Checking Services.
7. In addition to the statements above of please refer to the Komfort ***Document KOM 041 - Disclosure and Barring Services Policy; this policy, includes an Annex 1) a register which describes the most commonly submitted positions and duties that are known as the exceptions to the Rehabilitation of Offenders Act 1974. It should be noted that this is not an exhaustive list.***
8. The organisation recognises that adhering to the Equal Opportunities Policy, combined with relevant employment policies and practices, including the Rehabilitation of Offenders Act 1974, maximises the effective use of individuals in both the organisation's and employees' best interests. Komfort Services recognises the great benefits in having a diverse workforce with different backgrounds, solely employed on ability.
9. The application of recruitment, training, and promotion policies to all individuals will be on the basis of job requirements and the individual's ability and merits.
10. All employees of the organisation will be made aware of the provisions of this policy.

Recruitment and promotion:

1. Advertisements for posts will give sufficiently clear and accurate information to enable potential applicants to assess their own suitability for the post. Information about vacant posts will be provided in such a manner that does not restrict its audience in terms of sex, race, marital status, disability, age, part-time or fixed term contract status, sexual orientation or religion;
2. Recruitment literature will not imply a preference for one group of applicants unless there is a genuine occupational qualification which limits the post to this particular group, in which case this must be clearly stated.
3. Although a Small Medium Enterprise organisation, Komfort Services, will endeavour to advertise all vacancies internally and promote from within.
4. All descriptions and specifications for posts will include only requirements that are necessary and justifiable for the effective performance of the job.
5. All selection will be thorough, conducted against defined criteria and will deal only with the applicant's suitability for the job. Where it is necessary to ask questions relating to personal circumstances, these will be related purely to job requirements and asked to all candidates.

Employment:

1. Komfort Services, will not discriminate on the basis of sex, race, marital status, disability, age, part-time or fixed term contract status, sexual orientation or religion in the allocation of duties between employees employed at any level with comparable job descriptions.
2. Komfort Services, will put in place any reasonable measures and/or adjustments within the workplace for those employees who become disabled during employment or for disabled appointees.

Training:

1. Where required, Komfort Services Employees will be provided with appropriate training regardless of sex, race, marital status, disability, age, part-time or fixed term contract status, sexual orientation or religion.
2. All Komfort Services Employees will be encouraged to discuss their future career prospects and training needs with their direct responsible Manager.

Grievances and Victimization:

1. Komfort Services emphasises that discrimination is unacceptable conduct which may lead to disciplinary action under the organization's Disciplinary Procedure.
2. Any complaints of discrimination will be pursued through the organisation's Grievance Procedure.



Michael Edwards - Managing Director - 2/01/2024

EU General Data Protection Regulations - EU GDPR Policy

Introduction

This Policy sets out the obligations and responsibilities of Komfort Services (Komfort) regarding data protection and the rights of Employees, Sub-Contractors and other interested parties as outlined in the document *KOM 043 Register of Interested Parties and Chapter 4.4 of the Komfort Quality Manual*, in respect of their personal data under the EU General Data Protection Regulations 2018 (2016/679). (GDPR).

Under the EU GDPR 2018, Komfort Services are classified as a Small Medium Enterprise (SME) and as such certain requirements of the GDPR do not apply to Komfort; these are:

- a) Komfort Services is not required to appoint a Data Protection Officer, unless changes occur within Komfort's core activities, which require regular and systematic monitoring of data subjects on a large scale, or if Komfort process special categories of personal data such as that revealing racial or ethnic origin or religious beliefs.
- b) Komfort need not keep records of processing activities, unless the processing Komfort carries out is not occasional or likely to result in a risk for the rights and freedoms of data subject.
- c) Komfort will not be under an obligation to report all data breaches to individuals, unless the breaches represent a high risk for their rights and freedoms
 - *Although as outlined in 1 a) above, Komfort is not required to appoint either a Data Protection Officer, responsibilities for Information Security and Data Protection Management are that of the Komfort Information Security Responsible Person (ISRP).*

The GDPR defines "personal data" as any information relating to an identified or identifiable natural person (a data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

This Policy sets out the process and procedures that are to be followed when dealing with personal data within Komfort. The procedures and principles set out in this document are to be complied with and must be followed at all times by Komfort, its employees, sub-contractors, consultants, contractors, or other interested parties working on behalf of Komfort.

Komfort is committed not only to the letter of the law, but also to the spirit of the law and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals with whom it deals.

*This policy document is to be used in conjunction with the Komfort Services Information Security Management System and Data Protection Policy Document **KOM 042**;*

Komfort Privacy and Data Protection Principles Policy and Scope:

This Policy sets out Komfort's aims to ensure full compliance with the EU GDPR.

The EU GDPR sets out the following principles with which any party handling personal data must comply.

This policy document is to be used in conjunction with the *"Komfort Services Information Security Management System and Data Protection Policy Document KOM 042"*

2. All personal data must be:

- i. Processed lawfully, fairly, and in a transparent manner in relation to the data subject;
- ii. Collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- iii. Adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed;
- iv. Accurate and where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which they are processed, is erased or rectified without delay;
- v. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes;
- vi. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

3. Lawful, Fair, and Transparent Data Processing:

- a) The EU GDPR seeks to ensure that personal data is processed lawfully, fairly, and transparently, without adversely affecting the rights of the data subject.
- b) The Regulation states that processing of personal data shall be lawful if at least one of the following applies:

- i. The data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- ii. Processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract;
- iii. Processing is necessary for compliance with a legal obligation to which Komfort is subject;
- iv. Processing is necessary to protect the vital interests of the data subject or of another natural person;
- v. Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in Komfort;
- vi. Processing is necessary for the purposes of the legitimate interests pursued by the Komfort or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a vulnerable adult or child.

4. Processed for Specified, Explicit and Legitimate Purposes:

- a) Komfort collects and processes personal data only for the following Explicit and Legitimate Purposes:
- b) Documents necessary for employment and remuneration, e.g., Proof of Right to Work; This may include:

- For Employees / Sub-Contractors / Consultants or Other Interested Parties:

- i. Individual's Passport with Confirmation of Right to Work Visa;
- ii. Home Office Document of Right to Work and Leave to Stay Indefinitely; National Insurance Number;
- iii. Driving Licence (where employee may be required to perform driving duties on behalf Komfort);
- iv. Bank Details to enable payment if remuneration;
- v. Home Address; Phones Numbers; Emergency Contact Details;
- vi. If required be certain contracts to which Komfort is obligated to clients to provide only employees / sub-contractors on a job having up to date DBS Declarations, copies of Disclosure and Barring Services (DBS) information;
- vii. Photographic images of employees or sub-contractors, for use on Komfort's web site;
- viii. Sharing of any "personal information" may be required by other interested parties, such as The British Assessment Bureau when conducting audits;

- For Clients / Customers:

- i. Clients Data required for preparation and completion of Job Tender Documents;
- ii. Komfort Services will only share "personal information" of Employees, Sub-Contractors, Consultants, or Other Interested Parties including Customers / Clients, as outlined in Table 1 below Lawful Bases;

5. Lawful Bases:

The EU GDPR mentions several legal grounds for the lawfulness of processing of “personal information” (data), of data subjects. A lawful basis for processing “personal information” consists of at least one of those legal grounds and can vary per “personal information” processing activity and purpose.

“The GDPR applies to “personal information” (data), meaning any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

Komfort Services uses the following Lawful Bases for processing of employee, sub-contractor, consultants other interested parties “personal information”:

Contractual Necessity: Meaning a natural person or data subject is a party in a contract or has to take steps in order to enter a contract, at his or her request, and in order to enter in a contract or perform a contract, it is needed and agreed that personal data processing happens within this contractual scope;

Legitimate Interest: In that both Komfort Services, its employees’ sub-contractors or other interested parties would reasonably expect to provide “personal information” as requirement of their employment or other involvement with Komfort Services;

Consent: Consent means that the data subject has given consent for a personal data processing activity for one or more specific purposes, including the publishing of articles by a named person or photographic images taken for use on the Komfort Services web site

Legal Requirements: This means if current legislation requires, it is a legal requirement placed upon Komfort Services to ensure collects, stores and processes “personal Information” i.e., Disclosure and Barring Services Declarations required by any of Komfort Services Clients;

Please refer to **Table 1** below, which shows the type of “personal Information” processed and the specific Lawful Basis being used for processing:

Lawful Bases Table 1

Purpose/ Processing Activity	Lawful Basis for processing under Article 6 of the GDPR.
<p>Individual's Passport; Individual's Passport with Confirmation of Right to Work Visa; Home Office Document of Right to Work and Leave to Stay Indefinitely; National Insurance Number;</p>	<p><u>Legal Requirement:</u> Komfort Services is Required under the Immigration Act 2016: and Employment Act 2002 / 2012, to ensure that all employed persons have the correct documents and permits permitting them to work in the UK;</p>
<p>Driving Licence (where employee may be required to perform driving duties on behalf Komfort Services;</p>	<p><u>Legitimate Interest:</u> Komfort Services has a Legitimate Interest with their employees and sub-contractors to ensure that vehicles supplied by Komfort Services for employees or sub-contractors, or employees or sub-contractors own vehicle used for company business are licensed to drive.</p>
<p>Bank Details and preferred method of payment, to enable payment if remuneration; Home Address; Phones Numbers; Emergency Contact Details;</p>	<p><u>Legitimate Interest:</u> In order to enable Komfort Services to remunerate employees and sub-contractors or other interested parties for services provided;</p>
<p>Processing of Disclosure and Barring Services documentation required by certain contracts to which Komfort is obligated to clients to provide only employees / sub-contractors on a job having up to date DBS Declarations, copies of Disclosure and Barring Services (DBS) information;</p>	<p><u>Contractual Necessity:</u> Komfort Services may be required by Customers / Clients or Other Interested Parties, to provide employees or sub-contractors for work sites, that hold valid DBS (Disclosure and Barring Services) Declarations; this may include sites where there are Vulnerable Adults, Children or facilities operating with sensitive information;</p>
<p>Sharing of "personal information" including photographic images of employees or sub-contractors or other interested parties, for use on Komfort's web site;</p>	<p><u>Consent:</u> Where consent is required for the publishing of written information or photographic images of employees, sub-contractors or other interested parties on Komfort's web site;</p>
<p>Sharing "personal information" of employees, sub-contractors, consultants, with other interested parties such as clients and audit companies conducting business related audits on Komfort systems.</p>	<p><u>Contractual Necessity:</u> Komfort Services belongs to a number business related organisations where as part of their Contractual Requirements, regular audits are conducted on Komfort's businesses processes and suitability for retaining association with the business organisations; this includes: The British Assessment Bureau for auditing of Komfort's BS EN ISO 9001:2015 and BS EN ISO 14001:2015 standards; <u>CHAS - The Contractors Health and Safety Assessment Scheme:</u></p>

6. Timely Processing:

- a) Komfort only processes Personal / Client Data for the specific purposes set out in **section 4 above and Table 1 above**, (or for other purposes expressly permitted by the Regulation);
- b) The purposes for which Komfort process personal / client data will be informed to data subjects at the time that their data is collected; where it is collected directly from them, or as soon as possible (not more than one calendar month) after collection where it is obtained from a third Party.
- c) The Company shall not keep personal data for any longer than is necessary in light of the purposes for which that data was originally collected and processed.

7. Record Destruction:

When the data is no longer required, all reasonable steps will be taken to erase it without delay; this includes:

- i. For stored electronic data, records will be permanently and securely deleted from all PCs, Servers and any other electronic storage media;
- ii. A record of destroyed or permanently deleted personal data, will be maintained on an Excel Spreadsheet (**KOM 052**), **Record of Destroyed Personal Information**, using only the name of the individual and employment number; no other personal information may be stored on any Komfort data system;
- iii. For personal information stored as hard copy, the hard copy record will be permanently destroyed, using either a Cross Cut Shredders or burning;
- iv. As with electronically stored records, destroyed hard copy records will be noted on the Excel Spreadsheet (**KOM 052**), **Record of Destroyed Personal Information**, listing only the name and Employment Number;

8. Adequate, Relevant and Limited Data Processing:

- a) The Company will only collect and process personal data for and to the extent necessary for the specific purpose(s) informed to data subjects as under **Section 4 and Tale 1 above**.

9. Accuracy of Data and Keeping Data Up To Date / Internal Auditing:

- a) Komfort Services conducts Internal Audits in compliance with its BS EN ISO 9001:2015 certification as outlined in Komfort's Quality Manual Chapter 16; this includes regular checks on the type and accuracy of "personal information" collected, stored and processed as part of conducting their business.

10. Secure Processing:

- a) Komfort shall ensure that all personal data collected and processed is kept secure and protected against unauthorised or unlawful processing and against accidental loss, destruction or damage.

Further details of the data protection and organisational measures which shall be taken are provided within the Komfort Information Security Management Systems (SMS) Policy, which demonstrates the direction and commitment of the company to information security in order to protect its own information assets and those provided to Komfort by Customers / Clients, Employees and other Interested Parties as identified in KOM 043 and Chapter 4.4 of the Komfort Quality Manual, Register of Interested Parties

11. Information Security Management System:

a) In addition to the EU GDPR, Komfort will develop and maintain an effective documented ISMS based on the requirements of ISO 27001:2013 Standard to ensure that we have a documented method of control that protects the data within Komfort, its customers and other interested parties;

b) It is Komfort Services Policy to Ensure That:

- i. Information will be protected against unauthorised access;
- ii. Confidentiality of information will be assured; (Through protection of valuable or sensitive information from unauthorised persons or organisations);
- iii. Integrity of information will be maintained; (By Safeguarding the accuracy and completeness of information by protecting against unauthorised modification);
- iv. Statutory Legislative and other Regulatory requirements will be met; (This applies to record keeping and also includes legislative requirements such as the "Computer Misuse Act and Data Protection Act").
- v. Business Continuity plans will be produced, maintained and tested; (This is to ensure that all information and vital services are available to users where and when they require them);
- vi. Information security training will be provided to all employees;
- vii. All breaches of information security, actual or suspected, will be reported to and investigated by the Information Security Officer;

12. Komfort Services Information Security Management Systems Objectives are to:

- a) Reduce information security risks to a level acceptable to Komfort Services Customers / Clients and all Other Interested Parties as outlined in KOM 043 Register of Interested Parties and Chapter 4.4 of the Komfort Quality Manual;
- b) Ensure that all information collected, held and used by the Komfort Services is appropriately protected and available in line with the company's business requirements;
- c) Ensure that information shared with any interested outside parties is protected against unauthorised disclosure and is managed in accordance with this policy;
- d) Ensure that all Komfort Services employees, including employees are aware of and comply with applicable legislative and regulatory requirements;
- e) Maintain employee awareness of information security, thereby ensuring that all employees acknowledge its importance to the company and their own individual responsibilities for information security;
- f) Ensure that all breaches of information security, actual or suspected, are reported to and investigated by the Information Security Responsible Person, who has direct responsibility for maintaining this policy and providing advice and guidance on its implementation;
- g) Provide documentary evidence in the form of records to show that the processes are being followed correctly and completely;
- h) Continually improve our ISMS based on customer, employee and other interested parties' feedback, incidents and Internal Audit findings;
- a) Information security objectives are to be formally reviewed on a yearly basis as part of the Komfort Services Management Review Programme, as outlined in *Chapter 8 of the Komfort Quality Manual, which complies with clauses 9.3.1; 9.3.2; 9.3.3; of the BS EN ISO 9001:2015 Standard; and Clauses 9.3 a)-f) of the BS EN ISO 27001:2013 Standard*
- b) Key performance targets are identified, monitored, measured, reviewed and reported at the Management Review Meetings as required by *Chapter 8 of the Komfort Services Quality Manual;*
- i) Enable the rapid dissemination of improvements to all relevant areas of the organisation and other interested parties;



Michael Edwards - Managing Director - 2/01/2024

Modern Slavery and Human Trafficking Policy

Introduction:

This document is the Modern Slavery and Human Trafficking Policy Statement of Komfort Services.

From October 2015 the *Transparency in Supply Chain Provisions* requires businesses to publish an annual statement in relation to "Modern Slavery and Trafficking", if they have an annual turnover above a threshold (£36 million).

This statement confirms that Slavery and Human Trafficking are not taking place within the Komfort's business (or in any part of the organisation's supply chain).

Komfort in addition confirms, that prior to purchasing services from outside bodies including sub-contractors considered to be within the organisation's supply chain, are required to complete a "Supplier Questionnaire" (see *Komfort Services Document KOM 010 section under Quality Assurance Question 4: "In conjunction with the Modern Slavery Act of 2015, if your business has a turnover of over £36m and you carry on business or part of a business in the UK you must provide a business statement on Slavery"; "If yes, please provide a copy":*

Although Komfort Services does not meet the minimum threshold of £36 Million annual turnover, as outlined in the Modern Slavery Act 2015 CH. 30, which requires organisation's exceeding an annual £36 Million threshold amount to provide annual turnover statements, Komfort Services, is fully committed to its social obligations, to ensure that Komfort and any part of its supply chain, including all employees and any sub-contracted parties comply with all existing and future Modern Slavery and Trafficking Legislation.

This Komfort Modern Slavery and Trafficking Policy Statement, will be reviewed on an annual basis.

The statement sets down Komfort's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking, prohibited practices relating to bonded/forced/underage labour, the use of convict/prison labour, in our own business and supply chains.

We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

This Policy Statement is used in conjunction with the following Komfort Policies and other documents.

KOM 001 - Komfort Services - Quality Manual;
KOM 015 - Komfort Services - Environmental Manual
KOM 016 - Komfort Services - Register of Statutory Legal and Other Requirements;
KOM 036 - Komfort Services - Equality and Diversity Policy; and Rehabilitation of Offenders Policy;
KOM 037 - Komfort Services - Grievance and Disciplinary Policy;
KOM 041 - Komfort Services - Disclosure and Barring Services Policy Document:

1. Organisational Structure and Supply Chains:

This statement covers the business activities of Komfort Services which are as follows:

The Scope of the Komfort Quality Management System (QMS), concerns only those areas that the business can directly control or influence and includes the following:

- Maintenance of office premises in accordance with local authority regulations;
- Management of Utilities; consumption (Water, Gas, Electricity);
- Use of road vehicles (leased or owned);
- Calibration of Measuring Instruments;
- The administration process required for the provision of Commercial refurbishment, fit out and maintenance, including but not limited to electrical, mechanical and plumbing; interior & exterior refurbishment and decoration; heating, air conditioning and acoustic solutions; plus, the purchasing of office materials and equipment;
- Where applicable client sites, where Komfort is acting as either the Main Contractor or Subcontractor;

Internal and External Context of the Organisation:

- In accordance with the BS EN ISO 9001:2015 and BS EN ISO 14001:2015 Standards and to better identify and understand Komfort's *context within their business*, Komfort has drawn up a separate procedure entitled: **KOM 026 "Procedure for Determining the Context of the Organisation and Other Interested Parties"** which is contained as a separate document within Komfort's data system.

2. Countries of Operation:

The Company currently operates only in the United Kingdom:

Komfort in addition confirms, that prior to purchasing services from outside bodies including sub-contractors considered to be within the organisation's supply chain, are required to complete a "Supplier Questionnaire" (see *Komfort Services Document KOM 10 section under Quality Assurance Question 4: "In conjunction with the Modern Slavery Act of 2015, if your business has a turnover of over £36m and you carry on business or part of a business in the UK you must provide a business statement on Slavery"; "If yes, please provide a copy":*

3. High Risk Activities

Currently, Komfort Services does not consider any of its operations or activities are at high risk of modern slavery or human trafficking:

4. Responsibility for the Komfort Anti-Slavery Policies Initiatives:

- The Managing Director or staff member authorised, is responsible for creating and reviewing policies and all processes by which policies are developed and actions taken.
- The Managing Director or staff member authorised is responsible for ensuring Risk Assessments in respect of Human Rights and Modern Slavery
- The Managing Director or staff member authorised is responsible for adequate Due Diligence in relation to known or suspected instances of modern slavery and human trafficking.

5. Training:

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, Komfort requires all Directors, Management and other employees including Sub-Contractors to undertake awareness training activities, which include a PowerPoint presentation and reading the Chartered Institute of Building brochure entitled "Construction and The Modern Slavery Act" ("Tackling Exploitation in the UK").

Confirmation of reading the brochure, will be registered on the Komfort Training Matrix.

7. Due Diligence Processes for Slavery and Human Trafficking:

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers, as outlined in Chapter 3 above.

The Company's due diligence process includes e.g., building long-standing relationships with suppliers and making clear our expectations of business partners and / or evaluating the modern slavery and human trafficking risks of each new supplier and /or invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by Komfort Services including the termination of the business relationship.

6. Review of Policy Statement:

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary, by the Komfort Services Management Team who endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:



Michael Edwards - Managing Director - 2/01/2024

Health & Safety Policy

Safety Policy Introduction

The safety policy is designed as a living document and should always reflect how the business operates.

It comprises three parts:

1. Policy Statement

This summarises the business commitment to health and safety, details general responsibilities and gives information relating to arrangements for implementing the policy and ensuring that it is kept current.

The Policy Statement should be signed by the Managing Director and be displayed prominently, or made available at all sites and workplaces.

2. The Organisation

This describes the structure of the business in terms of health and safety responsibilities. There should be a section relevant for everyone in the business.

All operatives need information from this section in so far as it relates to them.

3. Health and Safety Arrangements

This section details and provides guidance on the specific day to day arrangements and responsibilities for controlling or eliminating the types of hazards to health and safety that may arise as part of the Company's activities.

Inclusive of responsibilities under CDM Regulations 2015, as applicable.

All operatives should be made aware of the contents of this section and how it may affect their work activities, this should be communicated by:

- Induction training
- Health and Safety booklets/posters
- Site rules
- Toolbox talks
- Refresher training etc.

Any queries or problems please contact the Safety Manager, for support and guidance.

Company Health and Safety Policy Statement

The Company recognises its responsibilities under the **Health and Safety at Work etc. Act 1974** and other relevant safety legislation with regards to its employees and others who may be affected. The Company also recognises that Health and Safety should be considered equally with quality and performance when work is being considered or undertaken.

The Company will provide such information, training, supervision, plant and equipment as necessary, to identify, eliminate or control hazards and risks at the workplace. Adequate resources will be provided for this purpose. The overall objective is to achieve as far as reasonably possible a safe and healthy workplace for all employees and those affected by its activities.

To help us achieve aims, we have implemented an integrated management system (IMS) complying with the international standards ISO 9001: 2015, ISO 14001: 2015 and ISO:45001:2018

Any Company employee who supervises or manages the use of work equipment shall have received adequate training for the purposes of health and safety, including training in the methods that may be adopted when using the work equipment, any risks that such use may entail and precautions to be taken.

All employees and sub-contractors are expected to co-operate with the Company in carrying out this Policy and must ensure that their own work, so far as is reasonably practicable, is carried out without risk to themselves or others.

The Company actively encourages feedback and worker participation to help improve and promote processes.

The Board of Directors have appointed Michael Edwards as having particular responsibility for Health, Safety and Welfare and is to whom reference should be made in the event of any difficulty arising in the implementation of this Policy.

The Management and staff of the Company will monitor the operation of this Policy to encourage and strive for continual improvements in health and safety performance as an ongoing action. To assist in this respect, the Company has an appointed Health and Safety Manager to give advice and support on the requirements of the relevant statutory provisions and safety matters and to visit sites and workplaces to ensure compliance.

This Statement of Company Policy will be displayed prominently or made available at all sites and workplaces.

In addition, the Organisation and Arrangements for implementing the Policy will also be available at each site and workplace. A full copy of the Policy is held at, **77 Crown House, Colham Green Road, Uxbridge, UB8 3QH** for reference by any employee as required.



Michael Edwards - Managing Director - 2/01/2024

This Policy will be reviewed on an annual basis or as required to reflect any changes in legislation.

Managing Director

- Initiate the Company Policy for Health, Safety and Welfare to prevent injury, ill health, damage and wastage; set targets for the reduction of accidents and ensure that it is brought to the notice of all employees.
- Be aware of the employer's legal duties under the Health, Safety at Work etc. Act 1974 and all supporting Regulations made under Section 15 of the Act.
- Encourage proper reporting, investigation and costing of injury, ill health, damage and loss. Promote action to preclude recurrence and initiate analysis to discover accident trends.
- Ensure that the Company Directors are aware of their responsibilities and that each administers and promotes with enthusiasm the requirements of this Policy throughout the entire Company.
- Encourage training for all levels of employees.
- Ensure that safety directives (new legislation, etc.) are conveyed through all management levels down to site.
- Sanction the necessary funding for adequate welfare facilities and equipment, training and all matters of health and safety to meet the requirements of the Company Policy both legislative and Company requirements on Health, Safety and Welfare.
- If contacted by a member of staff or by the HSE directly regarding any potential issue that may result in prosecution, prohibition or improvement ensure that the circumstances are investigated, either personally, by a member of senior management or by the company safety advisors to ensure that the situation is remedied and that the likelihood of a recurrence is reduced.
- Set a personal example when visiting sites by wearing the appropriate clothing and/or protective equipment.
- Monitor effectiveness and review periodically, the requirements of the Company's procedures as laid down in the Health and Safety Policy and any stipulated Safe Systems of Work are observed.

Directors

- Be aware of the employer's legal duties under the Health, Safety at Work etc. Act 1974 and all supporting Regulations made under Section 15 of the Act
- Know the appropriate statutory requirements affecting the Company's operations. Know and promote the Company Policy for Health, Safety and Welfare and ensure that it is brought to the notice of all employees.

- Ensure that appropriate training is given to all staff as necessary.
- Administer the Policy throughout the Company with an individual Director nominated as being responsible for health and safety.
- Insist that sound working practices are observed throughout the Company as laid down by Codes of Practice, and that work is planned and carried out in accordance with the statutory provisions.
- Ensure that tenders are adequate to allow for proper welfare facilities, safe working methods and equipment to avoid injury, ill health, damage and wastage.
- Promote liaison on health and safety matters between the Company and others working on the site. Reprimand any member of staff failing to discharge satisfactorily their responsibilities for health and safety. Support arrangements for funds and facilities to meet the requirements of the Company Policy.
- Set a personal example when visiting sites by wearing appropriate clothing and/or protective equipment. the appropriate personal protective equipment and follow any relevant procedure, currently in place.
- Arrange for regular meetings with the appropriate personnel to discuss Company accident prevention, performance, possible improvements etc.

Safety Manager

- Monitor the effectiveness of the Company Policy for Health, Safety and Welfare against the safety performance of the Company. Initiate any changes, developments and amendments to the Policy as and when necessary. Receive information regarding new safety legislation or changes in existing legislation and liaise with the Company
- Director's and other relevant staff regarding the interpretation of such information and the actions required in order to meet the legislation.
- Promote an interest and enthusiasm for health and safety matters throughout the Company and foster an understanding that injury prevention and occupational hygiene are an integral part of business and operational efficiency.
- Ensure that the Company Directors, Managers and employees are aware of their responsibilities and that each administers the requirements of this Policy within their department and with due regard to all other departments.
- Report to the Board on all matters relating to safety and training, new safety directives and legislation and seek to establish the Company's response. As a result, instigate the necessary changes throughout the Company.

Assist all levels of staff with implementation of safety legislation by:

- Obtaining copies of the legislation and any codes of practice for issue to senior management.

- Arrange training for all levels of employees.
- Obtain visual aids etc. to promote awareness of injury prevention and hazards to health.
- Ensure that regular site surveys are carried out to see that only safe and healthy methods of working are in operation and that all regulations are being observed.

Maintain contact with official and professional bodies e.g. the Health and Safety Executive (HSE), Local Authorities, Fire Authorities, Royal Society for the Prevention of Accidents (RoSPA), British Safety Council, Institution of Occupational Safety and Health etc.

Inform the Health and Safety Executive (HSE) of all notifiable accidents. Assist in the investigation of notifiable accidents or dangerous occurrences and recommend means of preventing re-occurrence. Supervise the recording and analysis of information on injuries and ill health, assess accident trends and review overall safety performance.

Set a personal example when visiting sites by wearing the appropriate protective clothing, including safety helmet and safety footwear if necessary.

Senior Site Managers

(Definition: Project Manager, Site Manager or other persons appointed as the most senior person with overall responsibility for managing projects, sites or premises.)

- All Senior Site Managers should, where reasonably practicable:
- Be aware of the Company's Health and Safety Policy requirements and other statutory requirements affecting Komfort Services operations and seek further advice when necessary and current awareness of the employer's legal duties under the Health, Safety at Work etc. Act 1974 and all supporting Regulations made under Section 15 of the Act.
- Ensure that all Supervisors are aware of their health and safety responsibilities.
- Ensure all new employees, contractor's employees and visitors, including delivery drivers, are instructed on the relevant sections of Komfort Services Health and Safety Policy and any location-specific requirements by attendance at a Site Safety Induction.
- Organise and plan workplaces so that work is carried out in accordance with the Komfort Services Health and Safety procedures with minimum risk to employees, other contractors and members of the public.
- Bring to the attention of the Managing Director and Safety Manager, as appropriate, any health and safety improvement required or problems being encountered.
- Plan health and safety requirements into all operations in accordance with Komfort Services Health and Safety procedures.
- Ensure that all persons under your responsibility are in possession of the required personal protective equipment and worn as appropriate, as identified by the task risk assessment and they are aware of their obligation to wear it
- Ensure that adequate supplies of personal protective equipment are available and worn as appropriate.

- Accompany all Health and Safety Executive Inspectors and Enforcing Officers on their visits to sites/work place.
- Make full use of the services of the Safety Manager and ensure that all reasonable recommendations are actioned. Report immediately any dangerous occurrences, reportable accidents, disciplinary action or enforcing bodies' visits to the Safety Manager.
- Ensure that all contractors are made aware of their responsibilities for health and safety matters on the project.
- Actively promote at all levels Komfort Services commitment to effective health and safety management.
- Ensure that all risk assessments (including COSHH, Noise etc.) are effectively monitored, reviewed and communicated at the workplace. Identify the requirements for method statements and ensure that they are produced and viewed on time. Identify method statements' required distribution (e.g., foremen, supervisors, operatives, Client, etc) and ensure that they are followed and controlled as appropriate.
- Ensure that all persons under your responsibility are competent and trained as being suitable for the task(s) employed.
- Ensure that training is available where required and carry out on-site training through TBTs and Legislative briefings.

Supervisors

(Definition: Competent Person with a minimum of SMSTS/SSSTS qualification)

- Supervising workers, subcontractors and work activities.
- Make themselves familiar with the Company's Health and Safety Policy and adhere to all the site rules, notice and procedures made known to them.
- Preparing and presenting site inductions, safety briefings and toolbox talks.
- Assessing and managing safety hazards.
- Ensuring appropriate site rules and welfare facilities are in place.
- Carrying out regular inspections.
- Helping project managers to plan the work programme.
- Helping co-ordinate deliveries of materials, plant and equipment.
- Completing records for site reports.
- Attending site management meetings.

- Carrying out regular inspections to ensure compliance with relevant legal requirements, processes and procedures.
- Raising safety concerns at the appropriate level.
- Resolving problems and implementing improvements.

Operatives

(Definition: Labourer, ground worker, machine operative, tradesman or another worker in a non-managerial /supervisory role).

All operatives should, where reasonably practicable:

- Make themselves familiar with the Company's Health and Safety Policy and adhere to all the site rules, notice and procedures made known to them.
- Actively participate in the management of health and safety by reporting all incidents, accidents and near misses.
- Where appropriate, participate in safety committees or other formal consultation procedures.
- Follow the safe method and systems established for the site which may be set out in method statements, risk assessments, site rules, or otherwise.
- Refrain from working if they think either their health and safety or that of others will be compromised by the environment or the work to be undertaken, and inform their immediate line manager of their concerns.

All Personnel

(Definition: Any employee regardless of employment status e.g. labour only, self-employed)

All personnel have a duty and obligation to take reasonable care for the health and safety of themselves and of other persons who may be affected by their acts or omissions. The Company expects a reasonable and responsible attitude from all employees towards meeting their health and safety obligations at work.

All employees should, where reasonably practicable:

Be conversant with the relevant requirements identified in the Komfort Services Health and Safety Policy.

Set a personal example by wearing the appropriate protective clothing/personal protective equipment when on site.

Work in a safe manner at all times, take appropriate action where unsafe acts are observed and report any unsafe acts to the relevant manager.

Assist the Company in achieving the required Health and Safety standards. Individuals who are considered to consistently ignore this aim shall be subject to disciplinary action.

Use and maintain the correct tools and equipment and keep such tools and equipment in good condition, reporting any defects to the appropriate person.

Abide by any health and safety rules and instructions given at any location-specific induction.

Refrain from working if they think either their health and safety or that of others will be compromised by the environment or the work to be undertaken, and inform their immediate line manager and Safety Manager/Managing Director of their concerns.

Note:

Employees are reminded that it is an offence to intentionally or recklessly misuse or interfere with anything the Company uses or provides to comply with health and safety legislation. Refusal or failure to comply with the Company Health and Safety Policy will be considered a serious disciplinary offence.

Commercial and Site Support Staff

(Definition: Planners Pre-commencement Managers and Land Buyers, Estimators, Surveyors, Buyers etc who are involved in the procurement of resources e.g. materials, labour, equipment, drawings, advice, information, etc)

- All Commercial and Site Support Staff should, where reasonably practicable:
- Ensure persons under their control work in a safe manner.
- Assist the workplace management in achieving the Company's health and safety standards at any site, by reporting unsafe operations and conditions.
- Suggest ways of improving overall health and safety performance.
- Ensure the provision of support services does not knowingly compromise the workplace health and safety standards in place.
- Abide by any health and safety rules and instructions given at any location-specific induction.
- Wear mandatory PPE and any site-specific PPE, as appropriate when visiting any site.

Health and Safety Arrangements

Document Issue and Control

The Health and Safety Policy is produced and controlled by the Company Safety Manager.

The document shall be reviewed, and revised as necessary, at intervals not exceeding one year. Interim revisions will be issued as addenda when necessary.

A copy of this Health and Safety Policy document will be issued to all employees, and made available to other interested parties, as appropriate.

Application

The Health and Safety Policy has been produced for all activities undertaken by the company, this includes all Komfort Services construction sites, premises and office workplaces.

The Company recognises that regulations, custom and practice will differ between contracts but will adopt and implement, as a minimum, the standards set out in the Health and Safety Policy. Komfort Services management will ensure that this Policy is used as the basis of all operation-specific health and safety management, and that any processes developed by individual contracts incorporate Company guidance and procedures.

Where Komfort Services enters into a Joint Venture with one or more other entities, an agreement will be made, as part of the Contract, as to which health and safety management system will be utilised for operations. Where this is not the Komfort Services Health and Safety Policy then the Managing Director's authorisation is required.

Where Komfort Services has been appointed as Principal Contractor, under CDM Regulations 2015, the Company will ensure that all contractors employed will comply with Komfort Services policies and procedures. This will be in the form of PQQ assessment and reviewed throughout the project as necessary.

To maintain compliance with CDM Regulations, Komfort Services will produce a Construction Phase Plan outlining the scope and provisions of the contract and disseminate to all project personnel through the induction or briefing process pre-start.

Planning

Planning is an essential factor in meeting the Health and Safety Policy in order to identify the measures required to achieve effective risk management across the Company.

Hazard Identification, Risk Assessment and Risk Control

At all workplaces, Komfort Services will identify potential hazards and assess risks in accordance with legislation and record the findings. Subsequent control measures for the management of risk will reflect the principle of risk elimination where reasonably practicable, followed by risk reduction, with the adoption of personal protective equipment as a last resort.

Komfort Services managers and supervisors will apply the Company's Health and Safety standards as appropriate to meet the specific demands of the workplace, to ensure a safe place of work and that safe systems of work are provided, so far as is reasonably practicable.

The Company aims to provide a safe place and safe systems of work through:

Effective organisation and planning

Evaluation of risk;

- Identification of the appropriate controls, so far as is reasonably practicable, utilising Company
- Health and Safety procedure
- Production of suitable and sufficient risk assessments, method statements, permits to work, etc.
- Supervision, inspection, monitoring and review.

Legal and other Requirements

The Company will maintain a process for identifying and assessing the legal and other requirements applicable to it. This information will be kept up to date and communicated to its employees and other relevant interested parties as appropriate.

Objectives

The Company will develop and maintain documented and measurable health and safety objectives, as appropriate and in agreement with the Managing Director. This shall cover areas for improvement across the Company as a whole.

Implementation and Operation

Training, Awareness and Competence

Komfort Services aims to provide all staff with the appropriate training and awareness according to their position, the work they are to undertake, and their health and safety responsibilities. Personnel with key safety roles and the appropriate competency levels shall be formally appointed at all workplaces.

Health and safety training requirements will be identified for each level and function across the Company, and training provided as necessary. The Company will maintain systems for ensuring individuals have acquired and maintained the knowledge and competency required. Records of training will be maintained by the Company. Applicable to all contractors employed during the project.

Consultation and Communication

Komfort Services systems are structured to ensure that all personnel have a clear understanding of what is expected, and what role the individual plays, in relation to health and safety.

The Company encourages participation in good health and safety practice and improvements to Company standards from all those affected by its operations. To that end, appropriate means of communication shall be planned into all works at workplace, operation, contractor and individual level to ensure effective communication and consultation.

Operational Control

The Company will maintain performance standards for activities associated with known risks to ensure, so far as is reasonably practicable, that minimum legal requirements are met, effective control and counter measures are applied, and risk control is continually improved.

Performance standards take the format of document Health and Safety procedures and Best Practice Guidance. These are subject to regular review as to their suitability and effectiveness and are amended/updated as appropriate.

Due to the variance of Company activities, management may need to take account as to the application of the performance standards in certain situations.

Performance procedures include, but are not limited to, the identified risks involved in the following areas:

Purchase of goods and services; and use of external resources

Procedures will include for, purchasing of hazardous materials and substances, evaluation of risk associated with plant and equipment and the evaluation of the health and safety competence of contractors.

Hazardous Tasks

Procedures will include for, identification of hazardous tasks, determination and approval of working methods, pre-qualification of personnel for hazardous tasks and any safe systems of work and procedures controlling entry and exit of personnel to hazardous work sites.

Hazardous Materials

Procedures will include for the identification, storage and control of hazardous materials, and provision and access to material safety data and other relevant information.

Provision and Use of Work Equipment

The workplace management should implement control measures identified in the risk assessment and monitor work at height to ensure that significant work at height risks are reduced to as low as reasonably practicable.

Where it is not reasonably practicable to use a guarded work platform, suitable risk assessment and method statement should be provided for the works; where no such documents are provided a "permit to work at height" should be completed by the operations management team and the works closely monitored.

Ladders and Stepladders

Ladders / stepladders, other than for access, should only be used for short duration works where it is not reasonably practicable to use other equipment. A specific risk assessment should be provided and reviewed by the workplace management. Where no risk assessment is provided a permit to work at height should be issued where they are being used to work from.

Persons should be competent and experienced in the work they are to undertake and should be briefed on the safe system of work. The briefing should be recorded in writing.

Stepladders should be to the appropriate industrial standards and be of sufficient length / height for the tasks they are to be used for, the Company is replacing all Work at Height access equipment with guarded platform steps and low-level work platforms, to aid in the reduction of risk for falls from height. All unguarded access equipment is only authorised for use under a Permit to Work at Height.

All ladders and stepladders in the workplace should be inspected before use and weekly inspections carried out where they are in regular use. Where ladders are used for ad-hoc intervals for inspection, this should be determined in the workplace's risk assessment.

Rescue Plans

Where persons using personal fall protection equipment may fall but remain at height e.g. safety nets, harness and lanyards etc, a rescue plan should be produced as appropriate to the task and the type of equipment in use. Suitable rescue equipment should be provided on site and staff should be trained in its use and instructed in the specific emergency plans for the workplace. These briefings should be recorded in writing.

Maintenance of Safe Plant and Equipment

Procedures will include for, the provision, control and maintenance of plant and equipment, provision, control and maintenance of personal protective equipment, operator competence, segregation and control of access and inspection and testing.

Emergency Preparedness

The Company shall prepare, and periodically test as necessary, emergency plans and procedures appropriate to the risks identified in each workplace. This may include, but is not limited to, emergency plans for first aid and casualty treatment, fire, rescue and evacuation procedures, etc.

Emergency preparedness and response plans will be regularly reviewed, in particular after the occurrence of an emergency incident.

Emergency plans will include for, identification of potential emergencies, nominations of

personnel to take charge of emergency situations, actions to be taken in an emergency, means of raising the alarm and evacuation procedures and identification of any emergency equipment required.

The workplace specific emergency plans should be communicated to employees at induction and health and safety briefings.

Discipline

Komfort Services takes the management of health and safety very seriously and shall take appropriate disciplinary action against any person whose behavior falls below that expected by the Company in terms of health and safety.

Performance Measurement and Monitoring

Monitoring of Safety Performance

The Company will identify and monitor health and safety performance across all operations to ensure, so far as is reasonably practicable, risk controls are implemented and effective, health and safety policy requirements and objectives are being met and lessons are being learnt from any management system failures.

The Company shall ensure that there is sufficient approved supervision on a continual basis to adequately monitor health and safety performance, including any contractors' performance. The Company will maintain records, checklists, forms and registers, as appropriate, to document performance measurement.

All Company workplaces shall be assessed by the Safety Manager on a regular and formal basis as appropriate, in order to measure performance against the Komfort Services procedures for Health and Safety. Reports of performance measurement will be recorded, communicated, discussed and addressed throughout the Company as appropriate.

Accident/Incident Reporting and Investigation

The Company has identified responsibilities and standards in order to ensure that accidents and incidents are reported, investigated and reviewed, as appropriate.

All injury accidents are reported and recorded and are subject to appropriate investigation. The Company maintains procedures to ensure that internal personnel and external interested parties are duly notified of accidents and any subsequent investigation, as appropriate and governed by legislation and policy requirements.

The Company provides guidance to ensure that each accident is investigated appropriately, in order to establish the facts of the event, identification of root causes, and corrective action required to prevent reoccurrence.

Accident and Incident Analysis

Information relating to accidents and incidents, and supporting data including personnel figures and hours worked, will be formally reported within the Company on a regular basis. This is to enable internal collation, analysis and reporting of data as an additional measurement of health and safety performance. This information will be distributed throughout the Company, as appropriate.

Audit

The Company will conduct audits of the health and safety management system on a periodic basis to determine the level of conformity against planned health and safety arrangements, and to ensure the management system is properly implemented and maintained.

Results of audits will be forwarded to management for review and action as appropriate. The Company audit process will be supported by third party certification to OHSAS 18001.

Management Review

The senior management of the Company shall review the overall performance of the health and safety management system on a regular basis, in order to ensure its continued suitability, adequacy and effectiveness.

Records of the management review shall be kept and distributed as appropriate. These records will include the details and implementation plan, of any required corrective action plan.

The Company adheres to Government guidance and Construction Industry Council (CIC) Version 6 Site Operating Procedures as the legal measures. Office and Site Procedures are updated regularly and accordingly. Risk and Method Statements highlight safe project management methods.

Introduction

This procedure sets out guidance that has been put in place by Komfort Services for the health and wellbeing of staff during the Corona Virus Pandemic which is posing occupational ill health risks (physical and physiological) to employees and visitors, therefore all occupied offices, including every contract, where appropriate, should identify the specific occupational risks from their operations and should carry out pre-employment assessments and arrange for health screening and medicals appropriate to the identified needs, in relation to the Pandemic.

The CLC Reference Document - 01 April 2022, Construction Sector - Site Operating Procedures stated that the Government's "Living with COVID-19" plan made it clear that the pandemic is not yet over and we should continue to explicitly consider COVID-19 in our risk assessments. The Site Operating Procedures are no longer current but they remain as a reference document, should the situation arise.

Komfort Services will ensure it can support all employees during this pandemic by:

- Actively responding to the present threat posed by Coronavirus COVID-19, in following the current Government and NHS England guidelines for the prevention and containment of COVID-19, whilst carrying out our contracted works.

Maintain a current Business Continuity Plan

Komfort Services maintains an extensive Contractor Network, with ample resources available to cover any shortage of required skills, therefore the consequences of putting any works on hold would be minimal, due to our network of available trades.

Key issues requiring action:

- Client procedures need to be outlined and prioritised pre-start of any works.
- Control of work areas require the cooperation of all parties, allowing Komfort Services to complete the works at the earliest possible date, with minimal disruption to Client's business or activities.

Promote a safe, clean and sanitised work environment

Responding to the coronavirus threat, we have heightened cleaning and hygiene protocols, as follows:

- All Staff are briefed and kept informed of any updates regarding preventative measures, in dealing with COVID-19, as issued by the Government.
- Posters and updates are displayed on all our sites or briefings carried out to all site personnel, updating on the latest changes published.
- Komfort Services are compliant with the current Guidelines set out by the Government with regard to implementation of the required rules and procedures for self-isolation. This is applied for any Staff exhibiting high temperature or symptoms or after alert from NHS Track and Trace.
- All staff and visitors to our premises/sites are required to have their temperature taken on arrival on a daily basis/as necessary, for fitness to work i.e., benchmark 38°C.

- On Komfort Services Sites and in Head Offices, the focus is on sanitising all high contact areas, pre-arrival of personnel for start of work and provision of fixed hand sanitiser dispensers, antibacterial wipes, sanitiser bottles and disposable gloves, made available on entry to the site/office premises, as necessary.
- Focus on personal space and cross contamination risks, ensuring compliance with the current social distancing guide of Hands - Face - Space. Required signage will be displayed for information and guidance.
- Information signage will be displayed advising staff and visitors to wash/sanitise their hands upon entry to the office environments.
- Face masks/coverings to be issued to all staff that are required to attend sites, where the requirement is mandatory.

This strong focus on hygiene and safety will extend throughout our entire organisation and we will constantly seek to improve where we can, in compliance with the current Government/NHS Guidelines.

This will be reviewed in line with the latest infection levels/guidance, relevant to contracts and geographical locations.

Enabling employees to work remotely

Where necessary key personnel will be provided with home office facilities to enable them to continue functioning remotely for the benefit of the business.

All key management will be provided with personnel laptops and IT resources to continue, were necessary, with those contracts still operating and the planning of future contracts.

On-going communication with home workers will be carried out to check on their wellbeing and to maintain the Team ethic.

Institute office distancing policies

To maintain social distancing office staff will be instructed to work at home and only attend the office when absolutely necessary and for the minimum time required to carry out their work. Whilst attending the office, all personnel will comply with the required social distancing rules, displayed for their information throughout the premises.

This will continue to be monitored as the Government advice is published but will be relevant to the local restrictions in force and under continual review.

Visitors to the office

All meetings at the offices will be suspended unless urgent and if necessary, attendees are to be kept to a minimum, compliant with any current advice/ruling.

Encourage employees to self-educate using online resources

All employees will be updated by email and personal briefings on the latest precautions for the

prevention of contracting the COVID-19 virus.
Web links have been notified/posted for self education.

The Management Team have joined Microsoft Teams, set up for individual contracts.

All Staff have been vaccinated and new starters encouraged to get the vaccine when possible.

All Staff have been encouraged to take a recognised Lateral Flow Test, if they consider they have been exposed to or showing symptoms of COVID and respond accordingly to any result indicated.

Restrict travel - all non-essential travel is forbidden

All journeys not required for current essential works will be reviewed, dependent on current infection levels, geographically and personnel are required to comply with the current Government and NHS England Guidelines in force, at the time.

Equal Opportunity Policy Statement

The aims of this policy are to ensure that:

- Komfort Services is committed to building an organisation that makes full use of the talents, skills, experience, and different cultural perspectives available in a multi-ethnic and diverse society, and where people feel they are respected and valued, and can achieve their potential regardless of race, colour, nationality, national or ethnic origins, sexual orientation, gender, disability or

age.

- Komfort Services will follow the Equality Act 2010 and 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 their employment policies, procedures and practices.
- No-one receives less favourable treatment, on grounds of race, colour, nationality, ethnic or national origins, gender, sexual orientation, religion or belief, disability or age; or is disadvantaged by any conditions, requirements, provisions, criteria, procedures or practices that cannot be justified on any other grounds, or victimised for taking action against any form of discrimination or harassment, or instructed or put under pressure to discriminate against, or harass, someone on the above grounds.
- The organisation is free of unwanted conduct that violates the dignity of workers or creates an intimidating, hostile, degrading, offensive, or humiliating environment.
- Opportunities for employment, training and promotion are equally open to male and female candidates, candidates from all racial groups, candidates with or without disabilities, and candidates of any age, and of any sexual orientation, religion or belief.
- Selection for employment, promotion, transfer, training, and access to benefits, facilities and services, will be fair and equitable, and based solely on merit.

This policy applies to all aspects of employment, from recruitment to dismissal and former workers' rights. We will take the following steps to put the policy into practice and make sure that it is achieving its aims:

1. The policy will be a priority for the organisation.
2. Michael Edwards - Managing Director will be responsible for the day-to-day operation of the policy.
3. The policy will be communicated to all workers and job applicants,
4. Workers and their representatives and trade unions will be consulted regularly about the policy, and about related action plans and strategies.
5. All workers will be trained on the policy, on their rights and responsibilities under the policy, and on how the policy will affect the way they carry out their duties. No-one will be in any doubt about what constitutes acceptable and unacceptable conduct in the organisation.
6. Managers and workers in key decision-making areas will be trained on the discriminatory effects that provisions, practices, requirements, conditions, and criteria can have on some groups, and the importance of being able to justify decisions to apply them.
7. Complaints about discrimination or harassment in the course of employment will be regarded seriously, and may result in disciplinary sanctions, and even dismissal. The complaints procedure will be published in a form that is easily accessible.
8. Opportunities for employment, promotion, transfer and training will be advertised widely, internally and externally, and all applicants will be welcomed, irrespective of race, colour, nationality, ethnic or national origins, gender, sexual orientation, disability or age, religion or belief.
9. All workers will be encouraged to develop their skills and qualifications, and to take advantage of promotion and development opportunities in the organisation.
10. Selection criteria will be entirely related to the job or training opportunity.
11. We will make reasonable changes to overcome physical and non-physical barriers that make it difficult for disabled employees to carry out their work, and for disabled customers to access our services.

12. We will take a flexible approach to working arrangements. We will consider requests for changes carefully and objectively, and will accommodate them unless it would cause significant difficulties to the business or the employee.
13. Information on the ethnic and racial background, gender, disability, and age of each worker and applicant for employment, promotion and training will be collected and analysed, to monitor each stage of the recruitment process. The information will be held in strictest confidence and will only be used to promote equality of opportunity. Information about the religion/belief and sexual orientation of employees may also be monitored.
14. If the data shows that people from particular groups are under-represented in particular areas of work, lawful positive action training and encouragement will be considered for workers and others from that group, to improve their chances of applying successfully for vacancies in these areas.
15. Grievances, disciplinary action, performance assessment, and terminations of employment, for whatever reason, will also be monitored by gender, racial group, age, disability, religion/belief and sexual orientation.
16. Requirements, conditions, provisions, criteria, and practices will be reviewed regularly, in the light of the monitoring results, and revised if they are found to, or might, unlawfully discriminate on any of the above grounds.
17. All contracts between Komfort Services and contractors to supply goods, materials or services will include a clause prohibiting unlawful discrimination or harassment by contractors and their staff, and by any sub-contractors and their staff. The clause will also encourage contractors and potential contractors to provide equality of opportunity in their employment practices.
18. The effectiveness of the policy will be monitored regularly. A report on progress will be produced each year, and published via the intranet, the website, the staff newsletter, notice boards, and the annual report.
19. Customers and clients will be made aware of the policy, and of their right to fair and equal treatment, irrespective of race, colour, nationality, national or ethnic origins, sexual orientation, gender, religion/belief, disability or age.
20. The company will draw up an Action Plan detailing how this policy will be implemented in practice.

This policy has been endorsed by the Board of Directors.



Michael Edwards - Managing Director - 2/01/2024

Environmental Policy Statement

Komfort Services as a specialist Company having recognised responsibility for environmental matters, place a particularly high priority on environmental affairs with regard to Company operations and the range of services offered to customers. The Company operates a policy of effecting continual improvement and change in accordance with developing knowledge and changing environmental requirements.

Komfort Services staff are aware of the environmental sensitivity of the business sector in which the Company operates, and seek to continually develop the Company environmental compliance. Due to the need for continual improvement, it can never be possible to detail fully the Company environmental activities, but the following specific objectives form the basis of the Company Policy.

All Company operations must be carried out with due regard to all appropriate and relevant Environmental legislation and regulatory considerations.

The Company will continue to make available resources to ensure that suppliers and customers are made fully aware of their environmental, legislative responsibilities and related activities.

The company will take whatever measures may be necessary to ensure that the segregation of waste, collection, transportation, storage, recycling, reclamation and disposal of waste does not become hazardous to public health or the environment and that all waste transactions are recorded and records retained.

Controlled waste (i.e. general and hazardous waste) must not be stockpiled or treated (including bonfires) at company sites or premises without the appropriate Waste Management Permit from the Environment Agency (Waste Management Regulations Section 33).

The company recognises that Waste Management Duty of Care Regulations gives them responsibility for all of their waste until its final disposal site. This requires the prevention of uncontrolled releases of material (e.g. use of covered skips).

Any hazardous waste as classified must be disposed of according to the Hazardous Waste Regulations 2005 and the consignment note procedure followed.

Considerate Contractors guidelines will be followed on site as applicable in order to minimise disturbance to the local environment.

The Company will only use disposal facilities that hold an appropriate permit where the level of operational control and environmental compliance is deemed to be of a suitable level, and represents responsible Waste Management. The Company operates a continual training programme to ensure that staff keep up-to-date on the safe handling and disposal of all types of waste.

The company is committed to the prevention of pollution to air, land or water, including the uncontrolled releases of material (e.g., prevent leaks of diesel from tanks using bunds).

The Company will ensure that all transportation and the disposal of waste is covered by the appropriate documentation to ensure that the Duty of Care (Section 34) of **The Environmental Protection Act 1990** is fully complied with, regarding Waste Transfer Notes and waste descriptions. The Company will ensure that every effort is made to police the compliance of third parties within this Legislation.

The Company co-operates with, and assists to the best of its ability, officers of the Waste Regulatory Authorities in the exercise of their duties.

The Company has a policy of compliance with the Codes of Practice and Guidance published by The National Association of Waste Disposal Contractors (NAWDC) in the promotion of high environmental standards for the waste industry.

The Company requires its staff to advise senior management of any concerns they may have regarding poor practice by a Waste Disposal contractor, whether a NAWDC member or a non-member, or about any acts by a NAWDC member which might be detrimental to the environment.

The company constantly updates its knowledge and ability to satisfy the increasing need to obtain positive benefits from the volumes of material which come under the Company's control, which means that the issue of recycling, waste minimisation, waste to energy and the most environmentally appropriate disposal options are continually assessed and reviewed.

The Company will ensure that vehicles and equipment used are well maintained, clean and are always operated within legal limits, taking advantage wherever possible of engineering modifications to reduce pollution and emissions, and to save unnecessary consumption of energy.

The Environmental Policy of Komfort Services is one of continual review, and is subject therefore to frequent review and development. The Company's continued environmental responsibility is judged by its ever-widening customer base and the Public in general, while being driven enthusiastically by the Managing Director through the management structure.



Michael Edwards - Managing Director - 2/01/2024

Grievance Policy Statement

The aims of this policy are to ensure that:

- Komfort Services is committed to building an organisation where everyone is treated fairly and there is a procedure to informally and formally raise a grievance

The policy will be a priority for the organisation.

Michael Edwards - Managing Director will be responsible for the day-to-day operation of the policy.

The policy will be communicated to all workers and job applicants.

Workers and their representatives and trade unions will be consulted regularly about the policy, and about related action plans and strategies.

All workers will be trained on the policy, on their rights and responsibilities under the policy, and on how the policy will affect the way they carry out their duties.

Raising a Grievance at Work

Grievances are concerns, problems or complaints raised by a staff member. Any worker may at some time have problems or concerns with their work, working conditions or relationships with colleagues that they wish to raise with management.

Issues that may cause grievances include:

- Terms and conditions of employment
- Health and safety
- Work relations
- Bullying and harassment
- New working practices/organisational changes
- Discrimination.

The following principles will apply to the application of this procedure: -

Wherever possible grievances should be resolved informally without recourse to formal procedures. It is expected that individuals will enter into the procedure in good faith, with the aim of resolving a particular issue. The grievance procedure should not be used as a substitute for normal day to day discussions.

It is recognised that there may be occasions when it is not possible for a grievance to be resolved informally. In such cases the procedure below at Stage 1 should be followed. All parties should be absolutely clear whether any meeting is being held under the informal or formal stage of the procedure.

Any steps taken under this procedure should be taken promptly, unless there is a good reason for delay.

At any stage in the procedure, subject to the agreement of all parties concerned, there may be a suspension in proceedings to facilitate mediation fact-finding or other non-adversarial discussions with the aim of promoting resolution of the case.

At any stage in the procedure, the manager dealing with the grievance may, at his/her discretion, defer consideration of the grievance if other activities which are relevant to the grievance are pending or in progress. In such cases the parties will be advised of the reason for deferment.

If, on investigation, the grievance is found to be vexatious or trivial the manager may dismiss it without further consideration. The employee will be advised accordingly.

The company may, with the agreement of the employee, vary this procedure as appropriate to a particular case. In the event that it becomes impracticable to continue with the procedure, it may be discontinued. In such the aggrieved parties will be informed of the outcome of their grievance in writing.

Right to be accompanied

All employees who are the subject of this procedure will have the right to be accompanied at any formal meetings held under this procedure by a trade union representative or work colleague.

Equality and Diversity

To ensure fair treatment and, where appropriate, provision of support in the application of this procedure, employees should be invited to provide information about any equality or diversity issues which may be relevant.

Confidentiality

All parties involved in these procedures must ensure that they maintain, as appropriate, the confidentiality of the process within and outside the company.

Timescales

Whilst every effort will be made to comply with timescales, due to the complexity and or specific circumstances of a case, timescales may be extended. In such circumstances the individuals concerned will be advised of the reasons for any delay.

Mediation

At any stage in this procedure, the parties to the grievance may request that the matter be referred for mediation.

Mediation is likely to be most appropriate in cases involving interpersonal relationships. There may, however, be circumstances in which alternative non-adversarial discussions may be undertaken with the aim of promoting a speedy resolution.

Mediation is voluntary and will take place only if all parties agree. It is, however, hoped that employees will recognise the benefits of seeking to resolve issues via mediation and will be amenable to and cooperate with this approach.

Informal Procedure

Grievances can often be resolved quickly and informally through discussion with managers and there is an expectation that every effort will be made to resolve matters informally. Employees are therefore expected to raise any concerns or issues informally with their immediate manager/head of section (the manager).

Managers will discuss an employee's concerns in confidence with him/her, make discreet investigations, as appropriate, and attempt to address his/her concerns fairly and promptly.

It is the manager's responsibility to seek to resolve the grievance informally and to notify the individual of the outcome. This would normally take the form of a summary note of the discussion and its outcome.

It is expected that an employee will seek to resolve his/her grievance informally in the first instance and will only progress to a formal grievance if the issue cannot be resolved by informal means. Where this has been unsuccessful, or circumstances make this route inappropriate, the matter should be raised formally through the grievance procedure.

If the grievance is against the employee's manager it should be raised with that person's manager who will seek to resolve the matter informally as appropriate

Formal Procedure

Stage One - Formal Resolution

If it is not possible to resolve a grievance informally, the employee should raise the matter formally, and without unreasonable delay, by putting his/her grievance in writing. The manager will write to the employee acknowledging receipt of the grievance, normally within five working days.

The manager will invite the employee to attend a formal grievance meeting in order to discuss the grievance.

This meeting will normally take place within ten working days of the written acknowledgement. As a result of the initial grievance meeting, the manager may determine that it is necessary to make further enquiries and/or may appoint an investigating officer to conduct an impartial and thorough investigation into the background facts or into any allegations made by the employee.

Investigation

If an investigation is deemed appropriate, the manager will appoint an investigating officer. Where

the grievance relates to other employees, the individuals involved will be informed in writing of the nature of the complaint and will be given the opportunity to submit a response.

The results of the investigation will be provided to the manager in the form of an investigation report. This report will also be made available to the employee raising the grievance and any employee(s) named in the grievance.

Following the investigation, the manager may deem it appropriate to hold a further grievance meeting with the employee raising the grievance. The purpose of this meeting is to seek clarification on any further issues that might have arisen and to allow the employee to comment on the findings of the investigation.

In some cases, it might be appropriate to hold a grievance hearing with the aggrieved individual and the person(s) against whom the grievance lies.

Outcome

The manager will determine the outcome of the grievance. S/he may reject the grievance, or may uphold the complaint and indicate what steps have been/should be taken to resolve it.

The manager will inform the individual, in writing, of the decision and the right of appeal normally within ten working days of receiving the investigation report or of the final grievance meeting/hearing. The employee will be given an explanation if this is not possible and will be advised when a response can be expected.

Any employee(s) named in the grievance will also be advised, in writing, of the decision.

Stage Two - Appeal

If an employee remains aggrieved, s/he may write to a Director within ten working days of the date of the decision under Stage 1, exercising his/her right of appeal.

Appeals will be considered by a more senior manager; he/she will have had no prior involvement in the case.

Here the appeal involves other employees, the person(s) named in the grievance will be informed of the appeal and the outcome.

This procedure may, in the interest of natural justice, and following consultation with relevant parties, be varied and altered by the senior manager who will detail the reasons for the variation.

The decision may be given verbally at the appeal hearing and will in any event be conveyed or confirmed in writing within ten working days of the hearing. Any recommendations for further action will be clearly stated in the letter.

The decision following the appeal is final and there will be no further internal right of appeal. This procedure will be reviewed periodically to ensure compliance with changes in employment law and equality and diversity legislation.



Michael Edwards - Managing Director - 2/01/2024

Disciplinary Policy Statement

The aims of this policy are to ensure that:

Komfort Services is committed to building an organisation where everyone is treated fairly but where warranted discipline will be used as a last resort.

Michael Edwards - Managing Director will be responsible for the day-to-day operation of the policy.

The policy will be communicated to all workers and job applicants,

All workers will be trained on the policy, on their rights and responsibilities under the policy, and on how the policy will affect the way they carry out their duties.

Komfort Services' aim is to encourage improvement in individual conduct and performance. This procedure sets out the action which will be taken when the company rules are broken and provides a fair, effective and consistent method of dealing with disciplinary matters.

The purpose should remind people that the procedure is designed not as a dismissal procedure but as a means of encouraging employees to conform to acceptable standards.

Principles

- Employees are expected to know the standard of conduct or work expected of them.
- Employees will be provided with details of the allegations and any evidence prior to the meeting and they will be given the opportunity to state their case
- An employee is entitled to be accompanied by a trade union representative or work colleague at the meeting
- No employee will be dismissed for a first breach of discipline, except in cases of gross misconduct
- Employees have the right to appeal against any disciplinary action taken

Procedure

1. Informal discussions

Before taking formal disciplinary action, the manager or supervisor will make every *effort* to resolve the matter by informal discussion with you. Only where this fails to bring about the desired improvement should the formal disciplinary procedure be implemented.

2. First or formal verbal warning

If conduct or performance is unsatisfactory, the employee will be given a written warning or performance note.

Such warnings will be recorded but disregarded after three months of satisfactory service, providing there have been no subsequent disciplinary issues.

3. Written warning

If the conduct is regarded as more serious or the employees work or conduct are considered unsatisfactory after they have received a formal verbal warning, a disciplinary meeting may be called.

After a period of six months, if no further disciplinary action has been found necessary and the minor breach has been resolved, the warning will expire.

The disciplinary hearing is a formal process and will involve a senior manager - full records will be kept.

4. Final written warning

If the employee's work or conduct fails to improve, or where the allegation is particularly serious, the manager will follow the same procedure for a written warning. If proven, a final warning will be given to the employee warning that any further misconduct will result in a dismissal with appropriate notice. Employees will be paid for this notice period.

After a period of a year, if not further disciplinary action has been found necessary and the issue has been resolved, the warning will expire.

5. Gross misconduct

An employee can be dismissed without notice on grounds of gross misconduct. The employee will be suspended with pay while the circumstances of the alleged incident are investigated.

Examples of gross misconduct include - intoxication (whether from drink or drugs), fighting or other physical abuse, indecent behavior, theft, dishonesty, sabotage, serious breaches of health and safety rules, offensive behavior (such as discrimination, harassment, bullying, abuse and violence) and gross insubordination

A dismissal will be confirmed in writing within 10 working days of the date of the disciplinary interview.

6. The right to appeal

If the employee wishes to appeal against any disciplinary decision, they must appeal, in writing, within five working days of being notified of the decision.

Organisation

The effectiveness of this Policy is dependent on the people who are responsible for ensuring that all aspects of work, whether in the office or on site, are carried out with due consideration for safety and with minimum risk to health.

Ultimate responsibility lies with Michael Edwards but specific duties are delegated to others

according to their function, experience and training.

Company Directors, both individually and collectively will ensure that this Policy is applied throughout the whole Company as well as within the departments for which they have direct responsibility.

Similarly, all Managers must ensure that the objectives set out in this Policy are undertaken in their area of responsibility as well as in other areas in which their work integrates.

Site Management will ensure that all operatives, Sub - Contractors and visitors to site adopt this Policy.

Each individual person has a duty of care to themselves as well as to all those they come into contact with during any part of the working day.



Michael Edwards – Managing Director – 2/01/2024

Drugs & Alcohol Policy

Introduction

Komfort Services is committed to providing a safe, healthy and secure environment for all those who may be affected by its operations and activities. It recognises the inherent risks associated with illegal drug use, legal drug and alcohol abuse, and abuse or misuse of other substances e.g., solvents. This Policy is designed to eliminate these risks from workplaces and their surrounding environments.

Aims & Basic Requirements

This Policy applies to all direct employees, agency and sub-contract employees whilst at their workplace and visitors to company premises or workplaces. All persons present at any Komfort Services workplace must always be in a fit state to carry out their duties when at work. They must not possess, consume or be under the influence of alcohol or other impairing substances.

Anyone taking prescribed drugs must consult their doctor on the risk of the drug affecting their fitness to work before reporting for duty. Where a risk is identified they must report this to their supervisor before commencement of work and a risk assessment must be carried out.

Subcontractors and Visitors

It will be a condition of contract with subcontractor and agency firms that this Policy applies to anyone they send to work in a Komfort Services workplace. Any person found in breach of any of its requirements will be permanently excluded from all Komfort Services workplaces. Visitors to Komfort Services workplaces should be notified of the requirements of this Policy.

Requests for Help

Komfort Services will treat any requests for assistance from any employee who volunteers the

information that they have a drink or drug related problem sympathetically. A request of this nature will not be accepted subsequent to or immediately prior to testing for alcohol and drugs. During any programme of treatment, the individual may remain subject to the requirement of this Policy whilst at work.

Discipline

The disciplinary process will be invoked for direct employees as outlined in the Komfort Services Disciplinary Policy Statement where an individual:

- is removed from a workplace due to impairment or suspicion of impairment caused by substance abuse, drugs or alcohol consumption.
- tests positive for illegal drugs.
- is found to have a blood alcohol level exceeding the local drink drive limit.
- refuses to undertake a screening test for alcohol or drugs; or
- is found supplying illegal drugs in any company workplace.

Projects being undertaken under the Transport and Works Act have a lower alcohol limit. Employees will be notified of this on appointment to the project and will be subject to the relevant authority's Alcohol and Drugs Policy. Where there is a client requirement to work under another stricter policy, employees will be notified of the requirement to conform to that policy.

The Company will not accept any departure from these rules and will take the appropriate disciplinary action in the event of any infringement.



Michael Edwards - Managing Director - 2/01/2024



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