



SHEQ POLICIES
September 2025

Aston Crean UK Ltd
t/as Crean Contract Flooring & Tiling
1st Floor North | Alexander House | Christy Court | BASILDON | SS15 6TL

Tel: 01708 375510
info@crean.co.uk
www.crean.co.uk

Offices: **London | Belfast | Dublin | Mayo |**

ASTON CREAN SHEQ POLICIES

POLICIES AND STATEMENTS;

1. Health and Safety Policy Statement
2. Quality Policy Statement
3. Equal Opportunities Policy
4. Drugs Policy
5. Alcohol Policy
6. Stress Policy
7. Smoke Free Policy
8. Violence to Staff Policy
9. Ethical Policy
10. Fraud & Malpractice Policy
11. Training Policy
12. Anti Bribery Policy
13. Work Safe Policy
14. Security Policy
15. Complaints Policy
16. Modern Slavery And Human Trafficking Policy
17. Coronavirus (COVID-19) Policy
18. Mental Health & Wellbeing Policy

**ASTON CREAN UK LTD
HEALTH & SAFETY POLICY STATEMENT**

1. As the Board of Directors of Aston Crean UK Ltd, we accept that we have moral and legal responsibility for the Health, Safety and Welfare of all employees and others who may be affected by our Company's operations. We recognise that injury, damage, and loss can be avoided and that consideration for health, safety and welfare should rank equally with all other commercial considerations. We therefore will ensure the full implementation of this policy and expect all employees to follow my example.
2. The policy of this Company is that all work will be carried out in such a manner to safeguard, so far as reasonably practicable, the health, safety and welfare of all employees and others, this will include other contractors, visitors and members of the general public. In particular, the Company will:
 - a. Make the workplace safe and without risk to health, ensuring safe access and egress.
 - b. Ensure plant and machinery are safe and that safe systems of work are set and followed.
 - c. Give information, instruction, training and supervision necessary for health and safety.
 - d. Ensure articles and substances are moved, stored, maintained and used safely.
 - e. Provide a safe working environment with adequate welfare facilities.
 - f. Take all measures to meet, exceed or develop all necessary or desirable requirements and to continually improve on health and safety performance.
3. As a Company we will consult with employees on health, safety and welfare matters, importantly to include:
 - a. Any change which may substantially affect their health and safety at work, such as in procedures, equipment or ways of working.
 - b. The health and safety consequences of introducing new technology.
 - c. The information they require on the likely risks and dangers arising from their work, and measures to reduce or get rid of these risks and what they should do if they have to deal with a risk or danger.
 - d. The planning of health and safety.
4. Competent people will be appointed to assist the Company in meeting its statutory duties including where appropriate, specialists outside of our organisation to provide the necessary proficient advice on health and safety matters.



crean
CONTRACT FLOORING & TILING

5. Adequate funds, time and other resources will be allocated to meet the objectives of this Policy. Under no accounts should health and safety be compromised to meet the requirements of any other objective.
6. This policy will be reviewed at least annually or as legislation demands and reissued. Where appropriate amendments incorporated into this Policy will be brought to the attention of employees as new changes are implemented.
7. The allocations of duties, responsibilities and the arrangements for the implementation of this Policy are within this document. With your co-operation we are certain that we can achieve all that is required to meet with this, our Company's health, safety and welfare objectives.

Signed:

Daniel Hunt
Contracts Director

Date: 22/09/2025

ASTON CREAN UK LTD
QUALITY POLICY STATEMENT

Aston Crean UK Ltd (the 'Organisation') aims to provide defect free goods and services to its clients on time and within budget.

The Organisation operates a Quality Management System that aspires to, but not yet accredited to BS EN ISO 9001:2015 certification, including aspects specific to the construction industry.

The management is committed to:

1. Developing and improving the Quality Management System.
2. Continually improve the effectiveness of the Quality Management System.
3. The enhancement of client satisfaction.

The management has a continuing commitment to:

1. Ensure that client needs and expectations are determined and fulfilled with the aim of achieving client satisfaction.
2. Communicate throughout the Organisation the importance of meeting the client needs and legal requirements.
3. Establish the Quality Policy and its objectives.
4. Conduct Monitoring and Management Reviews of the effectiveness of the implementation of the Quality Management System
5. Ensure the availability of resources.

The structure of the Quality Management System is defined in the Quality Manual.

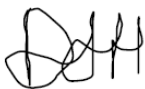
All personnel understand the requirements of this Quality Policy and abide with the contents of the Quality Manual.

In addition to all English and EU commercial legislation and regulations, the Organisation complies with all legislation and regulations specifically related to its business activities.

The Organisation constantly monitors its quality performance and implements improvements when appropriate.

This Quality Policy is regularly reviewed in order to ensure its continuing suitability.

Signed:



Daniel Hunt
Contracts Director

Date: 22/09/2025

ASTON CREAN UK LTD EQUAL OPPORTUNITIES POLICY

Aston Crean UK Ltd acknowledges the desirability of equal opportunities for employment and the observance of the code of practice as far as it is reasonably practicable. Also we are fully aware and compliant with the recent changes introduced by The Equality Act 2010 which provides a new cross-cutting legislative framework to protect the rights of individuals and advance equality of opportunity for all; to update, simplify and strengthen the previous legislation; and to deliver a simple, modern and accessible framework of discrimination law which protects individuals from unfair treatment and promotes a fair and more equal society.

The provisions in the Equality Act will come into force at different times to allow time for the people and organisations affected by the new laws to prepare for them. The Government is considering how the different provisions will be commenced so that the Act is implemented in an effective and proportionate way.

We shall comply by;

- Providing protection for people discriminated against because they are perceived to have, or are associated with someone who has, a protected characteristic, so providing new protection for people like careers.
- Providing protection for breastfeeding mothers;
- Applying the detriment model to victimisation protection (aligning with the approach in employment law).
- Making it more difficult for disabled people to be unfairly screened out when applying for jobs, by restricting the circumstances in which employers can ask job applicants questions about disability or health.
- Making pay secrecy clauses unenforceable.

The intention of the policy is to see that no job applicant or Employee receives less favourable treatment on the grounds of disability, sex, marital status, race, age, colour, nationality or ethnic or national origins, or is disadvantaged by unreasonable conditions or requirements.

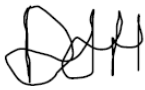
Individuals should be selected, promoted and treated on the grounds of their performance, attitude and abilities. All suitably qualified Employees will be given equal opportunity to progress within the organisation.

All those who come into direct or indirect contact with Employees or applicants for employment should ensure that they understand this policy and recognise the part they have to play in its fulfilment.

It is the policy of the Company to encourage the employment and career development of disabled persons. No unnecessary limitations are placed on the type of work that they can perform.

Full and fair consideration will be given to disabled applicants for employment; existing Employees who become disabled will have the opportunity to re-train and continue in employment wherever possible.

Signed:



Daniel Hunt
Contracts Director

Date: 22/09/2025

ASTON CREAN UK LTD DRUGS POLICY

Illegal substances come in many forms, but in general all will alter the way in which people consuming them perceive the world around them. Ecstasy, for example, reportedly often freely available within many dance venues, makes people feel ‘spaced out’ and slightly dizzy, whilst heroin (which can be smoked, sniffed through the nose or injected) slows people down and makes them feel sleepy and detached from reality. Other drugs, such as LSD and magic mushrooms, cause those who take them to hallucinate. This means they either see or hear things that do not exist, or see and hear things that do exist but in a totally different way.

Because of these effects, it is not hard to appreciate how those under the influence of illegal substances can be a danger both to themselves and to their colleagues. Whilst this danger might not be as great in an office environment as it would be, for instance, on a shop floor, the fact remains that the effect of the substance will alter the work contribution individuals will be able to make, and affect their performance within the work team.

Note: Aston Crean UK Ltd appreciates that many people who consume illegal substances would like to quit the habit yet may not be aware of the organisations to which they can turn for help, support and advice. Likewise, many others may be the family or friends of users who would equally welcome such assistance. It is therefore considered appropriate to give details of these organisations. All will treat your enquiry as confidential, and if they are not able to assist you directly will be able to refer you to someone who can.

**The National Drugs Helpline
(operate a 24-hour helpline)
Telephone: 0800-776600**

**ADFAM National
(Monday–Friday, 10.00–17.00)
Telephone: 020-7928 8900**

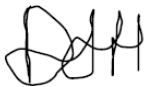
**Families Anonymous
(Monday–Friday, 13.00–17.00)
Telephone: 020-7498 4680**

From time to time all of us suffer ailments for which legally prescribed or legally available drugs are required, either to rectify the ailment itself or to relieve the symptoms suffered. Whilst in many cases the ailment will be temporary, in others it will be longer-term. Just as with illegal substances, however, the drugs we take legally will have some form of side effect. It is of importance that, where this side effect is likely to

affect your performance in any way (for instance you are likely to feel drowsy), you are to notify Aston Crean UK Ltd of this fact and the details.

Note: If the Aston Crean UK Ltd reasonably believes that anyone is under the influence of drugs at work at anytime then they shall be required to carry out a for-cause test to establish if they are under the influence of drugs. Also employees will be randomly tested during their employment with Aston Crean Ltd, if found positive then discipline/suspension procedures will be followed.

Signed:



Daniel Hunt
Contracts Director

Date: 22/09/2025

ASTON CREAN UK LTD ALCOHOL POLICY

Guidelines on alcohol consumption compare drinks in terms of the number of units of alcohol they contain. For instance, a half pint of average-strength beer, a small glass of wine and a single spirit measure each contain one unit of alcohol.

When we drink, the units we consume get passed into our circulatory system. Here they mix with our blood and get pumped by our hearts to our brains, where they begin to take effect and alter the way we feel and behave.

The amount of alcohol in our bloodstream is measured in milligrams of alcohol per 100 millilitres of blood.

In an average-sized man, a unit of alcohol converts to approximately 20 milligrams per 100 millilitres, whilst in an average-sized woman, a unit results in a blood alcohol level of approximately 30 milligrams. The difference between men and women arises from the fact that women are generally smaller than men and their bodies, as a consequence, contain less fluid. When a unit of alcohol is consumed by a woman it therefore forms a greater concentration in her bloodstream than it would in the bloodstream of a man.

If you are a man of average build and you drink one and a half pints of average-strength beer, you will be consuming three units of alcohol. As alcohol gets absorbed quickly by your digestive system, the result will be that within a relatively short period you will have a blood alcohol level of some 60 milligrams per 100 millilitres.

Tests have shown that a person with a blood alcohol level of 60 milligrams has impaired judgment, is becoming reckless and should not be making important decisions.

Consume two pints (*a mere four units*) and your blood alcohol level will be 80 milligrams per 100 millilitres. At 80 milligrams tests have shown that the average person suffers from a marked loss of co-ordination.

If you are a woman of average build, a blood alcohol level of 60 milligrams per 100 millilitres is reached after consuming just a single pint of beer (*the equivalent of just two glasses of wine or two shorts*), whilst 80 milligrams is reached by consuming just one further single unit.

With your judgment and co-ordination affected in this way, you are, for all intents and purposes, semi-detached from reality. Unfortunately, where plant, equipment and machinery are concerned, being semi-detached from reality could easily lead to serious accidents.

If having read this policy you believe you are consuming too much alcohol and want help in reducing your intake, the following organisations will be able to assist you. All calls will be treated as confidential.

The National Alcohol Helpline 0800-917 8282

Al-Anon Family Groups 020-7403 0888 (*for relatives and friends of alcoholics*)

Alcoholics Anonymous 01904-644026 (*Head Office*)

As an employer, it is our duty to promote and retain a safe working environment. After due consideration, we have decided that to permit people to work who have consumed alcohol is to put at risk not only the individual concerned, but his or her colleagues as well. As a consequence, we have determined that anyone found consuming alcohol whilst at work, or considered to be under the influence of alcohol during working hours, will be subject to disciplinary procedure.

Note: If the Aston Crean UK Ltd reasonably believes that anyone is under the influence of alcohol at work at anytime then they shall be required to carry out a for-cause test to establish if they are under the influence of alcohol.

This policy applies to all employees/agency workers and sub-contractors working for Aston Crean Ltd. **Everybody will receive instructions and information on compulsory alcohol testing during company induction.**

Whilst it may seem unreasonable to apply this policy to employees who do not work in high risk area, the fact remains that from time to time most employees will need to visit these areas in order to carry out their duties. If under the influence of alcohol when they do so, they will be putting themselves and others at risk.

In addition, all employees are engaged on the basis that they will provide the Aston Crean UK Ltd with their best endeavours at all times. As judgment and the ability to make decisions are an essential element of all jobs at all levels, and as alcohol affects judgment and the ability to make decisions, it is important that no category of employee should be excluded from this policy.

Signed:



Daniel Hunt
Contracts Director

Date: 22/09/2025

ASTON CREAN UK LTD STRESS POLICY

Introduction

Aston Crean UK Ltd is committed to protecting the health, safety and welfare of our employees. We recognise that workplace stress is a health and safety issue and acknowledge the importance of identifying and reducing workplace stress. This policy will apply to everyone in the company. Managers and supervisors are responsible for implementation and monitoring of staff. The company is responsible for allocating the necessary resources to deal with stress at work issues.

Definition of stress

The Health and Safety Executive define stress as “the adverse reaction people have to excessive pressure or other types of demand placed on them”.

This makes an important distinction between pressure, which can be a positive state if managed correctly, and stress that can be detrimental to health.

Our Policy

- The company will identify all workplace stressors and conduct risk assessments to eliminate stress or control the risks from stress. These risk assessments will be regularly reviewed;
- The company will consult with Trade Union Safety Representatives (If Nominated) on all proposed action relating to the prevention of workplace stress;
- The company will provide training for all managers and supervisory staff in safe practices;
- The company will provide confidential counselling for staff affected by Stress, caused by either work or external factors;
- The company will provide adequate resources to enable managers to implement the company’s agreed stress management strategy;

Responsibilities:

Managers and Supervisors

- Conduct and implement recommendations of risks assessments within their jurisdiction.
- Ensure good communication between management and staff, particularly where there are organisational and procedural changes.
- Ensure staff are fully trained to discharge their duties.
- Ensure staff are provided with meaningful developmental opportunities.



crean
CONTRACT FLOORING & TILING

- Monitor workloads to ensure that people are not overloaded.
- Monitor working hours and overtime to ensure that staff are not overworking. Monitor holidays to ensure that staff are taking their full entitlement.
- Attend training as requested in good management practice and health and safety.
- Ensure that bullying and harassment is not tolerated within their jurisdiction.
- Be vigilant and offer additional support to a member of staff who is experiencing stress outside work e.g. bereavement or separation.

Stress Manager (To be appointed)

- Provide specialist advice and awareness training on stress.
- Train and support managers in implementing stress risk assessments.
- Support individuals who have been off sick with stress and advise them and their management on a planned return to work date.
- Refer to workplace counsellors or specialist agencies as required.
- Monitor and review the effectiveness of measures to reduce stress.
- Inform the employer and the health and safety committee of any changes and developments in the field of stress at work.

Human Resources

- Give guidance to managers on the stress policy.
- Assist in monitoring the effectiveness of measures to address stress by collating sickness absence statistics.
- Advise managers and individuals on training requirements.
- Provide continuing support to managers and individuals in a changing environment and encourage referral to occupational workplace counsellors where appropriate.

Signed:

Daniel Hunt
Contracts Director

Date: 22/09/2025

ASTON CREAN UK LTD SMOKE-FREE POLICY

Introduction

This policy has been developed to protect all employees and visitors from exposure to second-hand smoke. The company acknowledges that non-smokers have a right to work in a safe and healthy environment and that exposure to second-hand smoke increases the risk of lung cancer and heart disease and causes or triggers asthma as well as many other illnesses and minor conditions. All employees must refrain from smoking outside the times and circumstances set out in this policy. The policy applies to all staff, visitors, contractors, consultants, customers, clients and other persons who enter the premises of this workplace.

As from 20th October 2007, smoking was prohibited in all places of public gathering including workplaces. It is the intention of the Company to comply fully with this requirement and therefore the conditions described below will come into effect from that date.

Policy Aims

This policy seeks to:

- Guarantee a healthy working environment and protect the health of employees and members of the public by ensuring that all company workplaces are smoke-free.
- Comply with: the Health and Safety at Work etc Act 1974, under which employers have a general duty to protect, so far as is reasonably practicable, the health, safety and welfare of their employees; and the [Health Act 2006 OR Smoking, Health and Social Care (Scotland) Act 2005], which prohibits smoking in enclosed workplaces and public places.
- Raise awareness of the dangers associated with exposure to tobacco smoke.
- Take account of the needs of those who choose to smoke and to support those who wish to stop.

Restrictions On Smoking

Smoking is prohibited at all times in all enclosed and substantially enclosed public or private areas in the workplace, including lifts, corridors, stairways, lavatories, rest rooms, reception areas or entrances. This applies to all persons, regardless of their status within the company or business with the company.

Staff

Members of staff are only permitted to smoke whilst off duty (in official break times only) and in unenclosed designated areas.

Visitors

All visitors, contractors, consultants, customers, clients and other persons who enter the premises of this workplace are required to abide by this smoke-free policy. All staff members are expected to make visitors aware of this policy and to ask any visitor who breaches this policy to extinguish all smoking materials. Visitors who continue to smoke should be reported to a manager.

Company Vehicles

Smoking is prohibited in vehicles belonging to or leased by the company and in staff private vehicles if ever used to transport members of staff or members of the public whilst carrying out their duties as an employee.

Implementation

Aston Crean Management has overall responsibility for the implementation and review of this policy. However, all members of staff are obliged to adhere to and support the implementation of the policy on an ongoing basis. All existing employees and new personnel shall be informed of this policy and of the designated smoking areas.

'No-smoking' signs will be clearly displayed at the entrances to and within the premises, and in all smoke-free vehicles. Appropriate signs will be displayed in the designated areas where smoking is permitted.

Non-Compliance

Any member of staff who does not comply with this policy shall be liable to disciplinary action in accordance with the company's Disciplinary Procedure. Those who do not comply with the smoke-free law may also be liable to a fixed penalty fine and possible criminal prosecution.

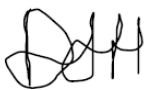
Help To Stop Smoking

The NHS offers a range of free services to help smokers give up. The NHS Smoking Helpline number is 0800 169 0 169 or visit www.gosmokefree.co.uk.

Review

This policy will be kept under review so as to ensure that it continues to meet its aims.

Signed:



Daniel Hunt
Contracts Director

Date: 22/09/2025

ASTON CREAN UK LTD
VIOLENCE AT WORK POLICY

Introduction

Aston Crean recognises its statutory duty to ensure that any aggression and violence as a potential risk to employees whilst at work is prevented. This procedure highlights the Company's systematic approach to ensure that so as far as possible, the procedures are adopted through the organisation.

It recognises that different staff groups might well be subject to different levels of risk which shall reflect additional advice or support such as providing means of communications i.e. mobile telephones.

Those at risk are staffs who regularly deal with members of the public who may be angry, distressed, disturbed, ill, embarrassed or resentful. The resulting feelings can be aggression and violence directed at our employees.

Violence from the public can be defined as "Any incident in which an employee is verbally abused, threatened or assaulted by a member of the public in circumstances arising out of the course of their employment".

Statement of Policy

The Company acknowledges the risk of violence and aggression towards staff while at work and affirms that such violence, threat of violence and aggression or verbal abuse is wholly unacceptable. The Company will ensure that employees are provided with, in so far as reasonably practicable, a safe place and safe systems of work and that where employees are subjected to violence and aggression, they are provided with appropriate support.

It will be the responsibility of the Maria Weir to ensure that all the procedures are brought to the attention all the employees

The Company will consider as unacceptable:

- i) Severe verbal abuse or threats to its employees.
- ii) Verbal or physical harassment of its employees including racial or sexual harassment.
- iii) Verbal or physical abuse to employees outside working hours, arising from employment with the Company.
- iv) Attacks on or damage to employees property arising from or in connection with employees carrying out their duties.

The key areas that can have a substantial impact to the performance of this policy are:-

- i) The prevention of violence.
- ii) Dealing appropriately with acts of violence and aggression.
- iii) Monitoring and aftercare

Preventing Violence and Aggression

The Company will implement procedures whereby the possibility of employees being harmed is reduced or removed.

Certain tasks and jobs may leave some employees more susceptible to violence and aggression than others.

The personal safety of such employees will remain a prime management consideration when designing jobs and allocating tasks. Personal alarms, mobile telephones or radios will be issued to those employees where risk assessments identify the need.

Training will be provided for employees who are considered to be in a potential risk situation, specific job training will include:

- i) An understanding of fear and aggression.
- ii) How to avoid/diffuse potentially violent situations.
- iii) What to do if threatened or attacked
- iv) What support is available if threatened or attacked and how to obtain it.

Additional elements will be included for managers covering:

- a) An understanding of the impact of fear, violence and aggression on employees and their work performance.
- b) The necessity for managers to adopt a sympathetic and clear response so that employees are encouraged to report such issues.
- c) The need for managers regularly to review operational procedures.

Procedures In The Event Of Violent Or Aggressive Acts

All abuse or violence to our employees must be reported. The necessary first aid will be provided to the employee in the event of an injury. In the case of serious assault the incident shall be reported to the Police and a full investigation to be carried out.

Support shall be given to any employee who is subject to violence or abuse, including any time off work required for interviews or attending court shall be deemed in Company time. Counseling will be provided where it is considered necessary.

Monitoring

The Company shall be responsible for monitoring all incidents of violence and aggression, this will be done via the reporting of all such incidents.

Cash Handling or Carrying

Employees who handle or carry cash as part of their duties should not put themselves or their colleagues at risk in defence of the money. If challenged in a robbery situation they should hand the money over as instructed and make no attempt to obstruct the perpetration of the act in any way.

Abusive Telephone Calls

Be patient, after a few moments the abusive language may abate. If the customer does not calm down, advise them clearly that unless they are able to continue the discussion in a civil manner, the call will be terminated. If it is impossible to supply a satisfactory answer to the query, offer to pass the customer to a supervisor.

Signed:



Daniel Hunt
Contracts Director
Date: 22/09/2025

ASTON CREAN UK LTD ETHICAL POLICY STATEMENT

Our ethical policy has been established to set standards and provide guidelines regarding the way Aston Crean UK Ltd should operate in Ethical matters. It is important to retain this set of core values and approaches to the process of doing business on a daily basis.

The Ethical policy focuses around nine key areas as follows:

Employees

Every employee has an equal opportunity for personal recognition and career development, regardless of personal background or belief. No form of discrimination or harassment will be tolerated. An important part of this policy is recruiting, selecting, rewarding and promoting people who demonstrate entrepreneurial behavior and show individual initiative in combination with a high degree of knowledge and experience of our products, markets and culture.

Customers

Everybody must play their part in providing quality and efficiency to customers. Aston Crean UK Ltd believes that integrity in dealings with customers is a prerequisite for a successful and sustained business relationship. Personal contact, helpful and responsive action are features of the service we provide to develop long term relations with our customers.

Suppliers

Aston Crean UK Ltd believes in supporting UK trade and therefore will only buy from preferred UK based manufacturing companies if possible. Aston Crean UK Ltd will aim to develop relationships with suppliers based on mutual trust and all dealings will be conducted in a professional manner at all times. We also undertake to pay our suppliers on time and according to agreed terms. All supplier relationships are assessed against our Quality standards.

Community

Aston Crean UK Ltd seeks to comply with all legislation affecting its operations. We will seek to serve and support the community in which it operates by providing services efficiently and profitably, and by providing good employment opportunities and conditions. We will take into account the concerns of the wider community including both national and local interests. In particular, we will agree a chosen local charity each year and endeavour to raise money outside of business interests for this Charity.

The Environment

Aston Crean UK Ltd is concerned with the conservation of the environment in its broadest sense, and recognises that certain resources are finite and must be used responsibly. We will therefore: Work with others toward a consensus on environmental quality standards which are desirable and attainable. Aim to improve all aspects of the business in respect of environmental issues. Pay particular attention to environmental issues including the conservation of energy and natural resources, the control of noise levels, recycling of waste material and the utilisation of non-polluting technology. This is reflected in our emphasis to supply recycled promotional products as an option wherever possible

Health & Safety

Aston Crean UK Ltd provides safe working conditions for all its Employees and will do all that is reasonable and practicable to:

- Protect the health and safety of its employees and minimise any adverse effects on the environment
- Implement working practices to prevent personal injury and damage to property
- Making all employees aware of risk assessments and raise awareness of their own responsibilities for the health and safety of themselves and others;

Social Responsibilities

Aston Crean UK Ltd is committed to and encourages collaboration with organisations that support Fair Trade and operate non-exploitative employment practices in their own businesses and supply chains throughout the world. It will conversely not invest in or do business with any organisation that:

- Manufactures or designs weapons, instruments of warfare or torture, or that derives significant revenue from weapons related products or services; or
- Manufactures tobacco products or derives significant revenue from tobacco related production;
- Promotes the use of child labour;

Conflict of Interest

This policy does not allow bribery or political contributions and requires employees to seek to avoid conflicts of interest and to disclose any that do exist. Employees must ensure that their actions are not affected by conflicts of interests. This covers the receipt of giving of gifts or hospitality which is prohibited.

Information

Aston Crean UK Ltd regards information for the purpose of its business as a corporate asset which must be protected against loss of availability, infringement and improper disclosure. We seek to ensure as far as reasonably practicable, that this information is protected.

This applies also to intellectual property including inventions, trade secrets, technical information, product design, production expertise, customers' information etc.

Records

Honesty, completeness and accuracy of records are vital. Records of transactions should be maintained in an accurate, complete, transparent and timely manner in accordance with accounting principles. No unrecorded funds or assets should be established or maintained.

Signed:



Daniel Hunt
Contracts Director
Date: 22/09/2025

ASTON CREAN UK LTD FRAUD & MALPRACTICE POLICY STATEMENT

Introduction;

Aston Crean UK Ltd has a commitment to high legal, ethical and moral standards. All members of staff are expected to share this commitment.

We already have procedures in place that reduce the likelihood of fraud occurring. These include documented procedures and systems of internal control and risk assessment management. In addition we ensure that a risk (and fraud) awareness culture exists within our organisation.

This document is intended to provide direction and help to those Staff and Managers who find themselves having to deal with suspected cases of theft, fraud or corruption.

Our Policy;

- This policy applies to any irregularity, or suspected irregularity, involving employees as well as consultants, vendors, contractors, and/or any other parties with a business relationship with this organisation.
- Fraud & malpractice comprises both the use of deception to obtain an unjust or illegal financial advantage and intentional misrepresentations affecting any aspect of our company activity by one or more individuals among management, staff or third parties.
- All managers and staff have a duty to familiarise themselves with the types of improprieties that might be expected to occur within their areas of responsibility and to be alert for any indications or irregularity.
- Aston Crean UK Ltd is absolutely committed to maintaining an honest, open and well-intentioned atmosphere within the organisation. It is therefore also committed to the elimination of any fraud and/or malpractice.
- Aston Crean UK Ltd wishes to encourage anyone having reasonable suspicions of fraud or malpractice to report them. Therefore it is also our policy, which will be rigorously enforced, that no employee will suffer in any way as a result of reporting reasonably held suspicions.



crean
CONTRACT FLOORING & TILING

- All members of staff can therefore be confident that they will not suffer in any way as a result of reporting reasonably held suspicions of fraud or malpractice. For these purposes reasonably held 'suspicions' shall mean any suspicions other than those, which are raised maliciously and found to be groundless. The organisation will deal with all occurrences in accordance with the Public Interest Disclosure Act.

Signed:

Daniel Hunt
Contracts Director
Date: 22/09/2025

ASTON CREAN UK LTD TRAINING POLICY

General statement

We are committed to ensuring that all our staff has received adequate training in order to be able to carry out their duties safely and without risk to themselves or others. We aim to achieve this by providing induction training for all new employees and ongoing skills training. The need for training will be determined by the requirements of the individual employee's job role. We also constantly assess and review the development needs of our employees and actively encourage all staff, regardless of employment status, language skills and grade, to take advantage of all training opportunities available and to communicate their individual needs and requirements.

Legal position

Providing adequate training to our staff is a requirement of the Health and Safety at Work Act 1974. It is also required by other more specific legislation which relates to the use of machinery, handling activities, hazardous substances and the wearing of personal protective equipment. The test of adequacy is based on providing sufficient training to ensure that employees can carry out their duties without jeopardising either their health and safety, or that of their colleagues and visitors.

Procedures

The following procedures describe the steps that we will take to comply with our obligations to provide adequate training:

- All new employees will receive induction training. This training includes Health and Safety, Quality and Environmental management and covers key areas such as fire safety, first aid and any workplace hazards. A signature will be required from the employee to confirm that they have understood the contents.
- This training will also be provided to other groups who will be working on our projects. This includes agency temps, work experience students and sub-contractors
- Some training is a statutory requirement, e.g. for manual handling activities. However, where this is not the case, a Senior Manager/HR will determine whether any training is necessary in order to carry out the job role safely.
- Where an employee's job involves the operation of tools or machinery, on-the-job training will be provided by the Site or dedicated training provider. It is the responsibility of the employee's manager to ensure that this is carried out with



crean
CONTRACT FLOORING & TILING

close liaisons with the Health and Safety Manager. This training will also be given if an employee changes jobs

- If new machinery or equipment is purchased, further training is likely to become necessary.

Effectiveness

The effectiveness of our training policy is measured by checking: -

- Quality of work
- Customer Feedback
- Contract Retention
- Audits

Employee duties

Employees are expected to cooperate with us fully with regard to attending health and safety training courses. We expect that all reasonable effort will be made to attend a course, but if this isn't possible, that we will be notified well in advance. Should an employee fail to attend a course which is a legal requirement without good reason, we retain the right to treat it as a disciplinary matter.

Signed:

Daniel Hunt
Contracts Director
Date: 22/09/2025

ASTON CREAM UK LTD ANTI BRIBERY POLICY

The purpose of this policy is to:

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

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if we are found to have taken part in corruption we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

In this policy, **third party** means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential operatives, agencies, end-user companies, suppliers, distributors, business contacts, advisers, HRMC and other government and public bodies, including their advisors, representatives and officials.

Who is covered by the policy?

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

.

What is bribery?

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

Examples:

Offering a bribe

You offer a third party tickets to a major sporting event, but only if they agree to do business with us. This would be an offence as you are making the offer to gain a commercial and contractual advantage. We may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the third party to accept your offer.

Receiving a bribe

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

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

What risks do we face?

We have identified that the following are particular risks for our business:

- A worker being induced to authorise and process an expense which he/she knows or believes to be illegitimate
- A worker being induced to record information which he/she knows or believes to be false
- A worker being induced in an unethical way to provide a third party with a commercial or contractual advantage.

You should be aware of these particular risks, and take extra care if you are handling a situation in which you might be exposed to such risks.

Gifts

The giving or receipt of gifts is not prohibited, if the following requirements are met:

- it 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, or in explicit or implicit exchange for favours or benefits;
- it is not an unlawful gift;
- it is given in our name, not in your name;
- it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- it is appropriate in the circumstances (for example, small gifts given at Christmas time);
- taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;
- it is given openly, not secretly.

We appreciate that the practice of giving business gifts varies. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered. If you are at all unclear about the appropriateness of a particular gift, please speak to Maria Weir in the first instance.

Hospitality

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties, provided it falls within reasonable bounds of value and occurrence.

Although no two situations are ever the same, it is possible to identify suitable indicators which will help us to evaluate what would be considered acceptable:



crean
CONTRACT FLOORING & TILING

- What is the intent behind the hospitality – is it to build a relationship or is it something else?
- How would it look if details of the hospitality were made public? Would we feel embarrassed?
- What if the situation were reversed – would there be a double standard?

Entertainment of third parties may only be undertaken by managers or by others if they have been given express authorisation by **Maria Weir** in writing.

What is not acceptable?

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

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- offer or accept hospitality involving entertainment of a sexual or similarly inappropriate nature;
- solicit or try to solicit any gift or hospitality from a third party;
- threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy.

If you are unsure whether your actions would be acceptable or not, please consult with **Maria Weir** before proceeding.

Your responsibilities

You must ensure that you read, understand and comply with this policy at all times. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

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

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

Record-keeping

We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

You must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to review.

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

How to raise a concern

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with Maria Weir. Concerns should be reported via the same method.

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

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

Protection

Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken

We are committed to ensuring no one suffers any detrimental treatment 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 other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform Maria Weir immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be provided through contact with the HR department.

Training and communication

Training on this policy can be requested via the HR department at any time. Our zero-tolerance approach to bribery and corruption must be communicated to all operatives, agencies, suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

Who is responsible for the policy?

Maria Weir has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. He has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

Monitoring and review

Maria Weir will monitor the effectiveness and review the implementation of this policy regularly, considering its suitability, adequacy and effectiveness.

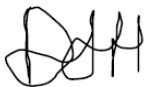
Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

All workers are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

Workers are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions, and queries should be addressed to the compliance manager.

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

Signed:



Daniel Hunt
Contracts Director
Date: 22/09/2025

ASTON CREAN UK LTD WORK SAFE POLICY

Aston Crean UK Ltd operates a Worksafe Policy (Or Refusal to Work Policy) for its staff working on all their sites.

Every member of Aston Crean and that of any applicable Sub-contractor's team working on behalf of Aston Creak UK Ltd has the absolute right to decline to carry out work if they feel it is not safe to do so.

Any situation arising which leads to an individual refusing to work for health and safety reasons must be reported to management as soon as possible, and no work should be recommenced until the issue(s) causing concern have been addressed.

The company additionally provides full confidential reporting arrangements via a direct line to Daniel Hunt (Director).

The contact number for confidential reporting is 07951768006. All reports will be fully investigated by Aston Crean's Health and Safety consultants to ensure that all personnel are not placed in a position where they are expected to carry out work that is unsafe.

Managers and supervisory staff are also encouraged to report any unsafe acts or conditions, which they have witnessed.

Signed:



Daniel Hunt
Contracts Director
Date: 22/09/2025

ASTON CREAN UK LTD SECURITY POLICY

Purpose

The purpose of this policy is to protect from all threats, whether internal or external, deliberate or accidental, the information assets of Aston Crean Ltd.

Objectives

The implementation of this policy is important to maintain and demonstrate our integrity in our dealing with customers and suppliers.

It is the policy of Aston Crean to ensure:

- Information is protected against unauthorised access
- Confidentiality of information is maintained
- Information is not disclosed to unauthorized persons through deliberate or careless action
- Integrity of information through protection from unauthorised modification
- Availability of information to authorized users when needed
- Regulatory and legislative requirements will be met
- Business continuity plans are produced, maintained and tested as far as practicable
- Information security training is given to all Employees
- All breaches of information security and suspected weaknesses are reported and investigated

Applicability

All Aston Crean personnel and suppliers, employed under contract, who have any involvement with information assets covered by the scope of the Information Security Management System, are responsible for implementing this policy and shall have the support of Management who have approved the policy.

Goals

- To identify through appropriate risk assessment, the value of information assets, to understand their vulnerabilities and the threats that may expose them to risk.
- To manage the risks to an acceptable level through the design, implementation and maintenance of a formal Information Security Management System
- To comply with legislation including;
 - Companies Act 1985
 - Health and Safety Act
 - Interception of Communication Act 1985
 - The Data Protection Act (1998)
 - Copyright, Designs and Patents Act (1988)
 - Computer Misuse Act (1990)



crean
CONTRACT FLOORING & TILING

- Regulation of Investigatory Powers Act (2000)
 - Freedom of Information Act (2000)
 - Human Rights Act (2000)
-
- To comply with any customer contract conditions relating to information security.
 - Commitment to comply with ISO 27001
 - Commitment to achieve and maintain certification to ISO27001

Specific Policies

Specific policies exist to support this document including:

- Physical Security
- Site access control policy (key holders, wearing of badges, visitor controls)
- Computer usage policy (email, internet access, access control, software download)
- Password controls (frequency of change, length, complexity)
- Data backup
- Virus control policy (frequency of updates, control of external media)

Responsibilities

It is the responsibility of Maria Weir to continually review this policy, facilitate and implement this policy through the appropriate standards and procedures

All personnel and contracted suppliers are to follow procedures that maintain the information security policy.

All personnel have a responsibility for reporting security incidents and any identified weaknesses.

Any deliberate act to jeopardise the security of information that is the property of Aston Crean UK Ltd or their customers or suppliers will be subject to disciplinary and/or legal action as appropriate.

Review

The policy is reviewed bi-annually and in case of influencing changes to ensure it remains appropriate for the business and our ability to serve our customers.

Signed:

Daniel Hunt
Contracts Director

Date: 22/09/2025

ASTON CREAN UK LTD COMPLAINTS POLICY

Aston Crean UK Ltd believes that if a someone (either employee or non employee) wishes to make a complaint or register a concern they should find it easy to do so. It is our policy to welcome complaints and look upon them as an opportunity to learn, adapt, improve and provide better services. This policy is intended to ensure that complaints are dealt with properly and that all complaints or comments are taken seriously.

The policy is not designed to apportion blame, to consider the possibility of negligence or to provide compensation. It is NOT part of each establishment's disciplinary policy.

Aston Crean UK Ltd believes that failure to listen to or acknowledge complaints will lead to an aggravation of problems, client/public dissatisfaction and possible litigation. Aston Crean supports the concept that most complaints, if dealt with early, openly and honestly, can be sorted out at a local level between just the complainant and each establishment (whether this is either on site or within the office domain). If this fails due to either the establishment or the complainant being dissatisfied with the result, the complaint will be referred to the Director and legal advice will be taken as per necessary.

Aim

Aston Crean's aim is to ensure that its complaints procedure is properly and effectively implemented, and that all personnel feel confident that their complaints and worries are listened to and acted upon promptly and fairly.

Goals

Aston Crean's goals are to ensure that:

- clients, employees, general public and others and their representatives are aware of how to complain, and that we provides an easy process to register complaints
- a named person will be responsible for the administration of the procedure
- every written complaint is acknowledged within two working days
- investigations into written complaints are held within 28 days
- all complaints are responded to in writing by each establishment
- complaints are dealt with promptly, fairly and sensitively with due regard to the upset and worry that they can cause.

The named complaints manager with responsibility for following through complaints is Alan Crean (Aston UK Ltd Safety Director).

Complaints Procedure:

Oral Complaints

- All oral complaints, no matter how seemingly unimportant, should be taken seriously. There is nothing to be gained by staff adopting a defensive or aggressive attitude.
- Staff who receive an oral complaint should seek to solve the problem immediately if possible.
- If staff cannot solve the problem immediately they should offer to get their line-manager to deal with the problem.
- All contact with the complainant should be polite, courteous and sympathetic.
- At all times staff should remain calm and respectful.
- Staff should not accept blame, make excuses or blame other staff.
- After talking the problem through, each manager or the member of staff dealing with the complaint should suggest a course of action to resolve the complaint. If this course of action is acceptable then the member of staff should clarify the agreement with the complainant and agree a way in which the results of the complaint will be communicated to the complainant (ie through another meeting or by letter).
- If the suggested plan of action is not acceptable to the complainant then the member of staff, or manager, should ask the complainant to put their complaint in writing to the establishment and give them a copy of the complaints procedure and form for completion.
- In both cases details of the complaints should be recorded on a complaints form and handed to the Manager.

Written Complaints

- When a complaint is received in writing it should be passed on to the named complaints manager who should record it in the complaints book and send an acknowledgment letter within two working days. The complaints manager will be the named person who deals with the complaint through the process.
- If necessary, further details should be obtained from the complainant. • A leaflet detailing the procedure should be forwarded to the complainant.
- If the complaint raises potentially serious matters, advice should be sought from a legal advisor to the establishment.
- Immediately on receipt of the complaint, Aston Crean UK Ltd will launch an investigation and within 28 days should be in a position to provide a full explanation to the complainant, either in writing or by arranging a meeting with the individuals concerned.
- If the issues are too complex to complete the investigation within 28 days, the complainant should be informed of any delays.
- If a meeting is arranged the complainant should be advised that they may, if they wish, bring a friend or relative or a representative such as an advocate.
- At the meeting a detailed explanation of the results of the investigation should be given and also an apology if it is deemed appropriate (apologising for what has happened need not be an admission of liability).

- Such a meeting gives the establishment the opportunity to show the complainant that the matter has been taken seriously and has been thoroughly investigated.
 - After the meeting, or if the complainant does not want a meeting, a written account of the investigation should be sent to the complainant.
 - The outcomes of the investigation and the meeting should be recorded on appropriate documentation and any shortcomings in the establishment's procedures should be identified and acted upon.
 - Aston Crean will discuss complaints and their outcome at a formal business meeting and the establishment's complaints procedure should be audited by the Director every six months.

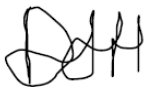
Training

The Director is responsible for organising and co-coordinating relevant training. All staff should be trained in dealing with, and responding to, complaints. Complaints policy training should be included in the induction training for all new staff and in-house training sessions on handling complaints should be conducted at least annually and all relevant staff should attend.

Review

The policy is reviewed bi-annually and in case of influencing changes to ensure it remains appropriate for the business and our ability to serve our customers.

Signed:



Daniel Hunt
Contracts Director
Date: 22/09/2025

ASTON CREAN UK LTD
MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

INTRODUCTION FROM THE BOARD OF DIRECTORS

We are committed to improving our practices to combat slavery and human trafficking. Aston Crean UK Ltd takes its obligations under the Modern Slavery Act 2015 very seriously and has robust working practices to comply with its obligations. This Policy documents sets out those practices and gives insight into the supply chain and business processes of the company. Any concerns from any member of staff regarding a likely risk of, or actual, breach of our policy or the legislation must be raised a Director at the earliest opportunity.

ORGANISATION'S STRUCTURE AND BUSINESS

Aston Crean UK Ltd is a tiling and flooring contractor that supplies and fits into new-build, refurbishment, fit-out and other construction projects for a number of sectors including housing, commercial and education.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere within our supply chain.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chain;
- Mitigate or resolve any identified risk of slavery and human trafficking occurring in our supply chain;
- Monitor potential risk areas in our supply chain; and
- Protect whistle blowers.

SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we reserve the right to audit our supply chains' anti-slavery and trafficking policies and procedures.

As part of the company's due diligence process into slavery and human trafficking, the supplier approval process incorporates a review of controls undertaken by the supplier. Imported goods from outside the UK and EU are potentially more at risk of slavery and human trafficking issues. The level of management control required for these sources will be continually monitored.

Aston Crean Ltd will not knowingly support or deal with any business involved in slavery or human trafficking.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will provide appropriate training to our staff such as toolbox-talks and company/site induction training. We also require our partners to provide training to their staff and suppliers and providers within their respective supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement. Maria Weir (Commercial Director) will undertake the responsibility for implementing this policy statement.

The policy statement will be reviewed and revised annually.

Signed:



Daniel Hunt
Contracts Director
Date: 22/09/2025

ASTON CREAN UK LTD
CORONAVIRUS (COVID-19) POLICY

1.INTRODUCTION

Where construction/work sites are fully operational during the Coronavirus (Covid-19) pandemic, Aston Crean will endeavour to protect our workforce and take the necessary guidance and measures to minimise the risk and spread of infection.

Aston Crean's policy is intended to introduce a consistent standard on sites in line with the UK Government's recommendations regarding social distancing during the Coronavirus (COVID-19) Pandemic.

The health and safety requirements of any construction activity must not be compromised as stated within all project/task specific approved RAMS for Aston Crean's current operations for each site.

If an activity cannot be undertaken safely due to suitably qualified person(s) being unavailable or social distancing not being achieved (unless the most reasonable possible control measures are in place below), the activity should not proceed.

In order to increase our ability to achieve these Guidelines, we will operate a level of resources to ensure we maintain compliance with same. We understand this could be lower than that usually expected in respect of resources to meet the contract programme of work.

2.SCOPE OF WORKS

This document is provided as a supplemental policy and method statement to those currently in circulation at the above project during the Covid-19 Pandemic.

This is a generic policy which must form the basic standard on any site that is working during this unprecedented time. If site standards are already in place that exceed these requirements, then no further action is required but the site procedures must be documented.

SEQUENCE OF WORKS

All activities will be undertaken in strict compliance with Aston Crean's current approved specific RAMS issued for each working activity on each specific site, in circulation and signed by the site operatives.

However, whilst not compromising any of these activities/tasks detailed therein the following will be adopted:



- Operatives will only use their own PPE and will not borrow or use anyone else's, ensuring the PPE is kept in a clean and safe place at the end of each shift.
- PPE should, where possible, be cleaned on a regular basis i.e. safety glasses/goggles, safety helmet etc. or use a fresh set of PPE.
- Unless it is a risk to the activity, latex/plastic/vinyl gloves should be worn where normal PPE gloves are not worn. This includes entering/leaving the site offices and other facilities.
- Managers, supervisors, operatives and subcontractors will avoid close working, i.e. social distancing of 2 metres, however, where this is not practically possible, the working activity that is involved should not be undertaken. However if working, avoiding the 2m rule is impossible the following steps are to be adopted:
 - Establish prior to commencing this work, whether or not, it is essential it is completed. If the work is not essential, it is not to take place.
 - Plan all other work to minimise contact between workers.
 - Establish both persons have washed or sanitised their hands prior to commencing this activity.
 - Where possible, only working with a familiar colleagues and known to Aston Crean.
 - Ensure gloves are worn and no skin to skin contact is made.
 - Ensure that a fit-tested FFP3 mask is worn by both parties.
 - Light eye protection or a suitable visor is to be worn.
 - Re-usable PPE is to be cleaned and sanitised before and after use.
 - Disposable PPE is to be immediately disposed of in approved bins.
- Activities being undertaken will be planned to reduce the number of operatives in one work area allowing the social distancing of 2 metres to be achieved.
- The use of stairs will always be maximised instead of lifts and gloves must always be worn.
- Where lifts or stairs must be used, all site operatives will ensure these are not overcrowded and operated allowing the 2 metres social distancing to be achieved. Particular attention is to be drawn to preventing personnel from passing on stairs:
 - Where more than one set of stairs is available, then a one-way circuit is to be achieved
 - If only one set of stairs exists, then the system of "1 up, then 1 down" is to be adopted, utilising passing points on landings, controlled to maintain the 2-metre rule.
- Operatives will regularly wash and sanitise our hands for a minimum of 20 seconds throughout and during the course of our activities .
- Operatives will regularly exit areas where fresh air is limited throughout the course of activities.
- Operatives will be consciously aware of not touching their faces, noses, mouth or eyes during activities and wash and sanitise our hands should this occur.

4. HAZARD IDENTIFICATION/RISK ASSESSMENT

A Risk Assessment, which identifies control measures required when working under the COVID-19 Pandemic is to be attached to all specific working RAMS.

5. COSHH ASSESSMENTS

COSHH assessments (where required) for planned works must be attached to the specific RAMS for the work undertaken.

- Medicated hand wash
- Hand sanitiser

6. TRAINING REQUIREMENTS & INSTRUCTION

- Contract Director, Contract Managers and Site Managers are to enforce site rules.
- Supervisors are to monitor their employees regularly to ensure that site rules are followed.

7. SUPERVISION AND RESOURCES

All contractors are to be controlled by a minimum of 1 supervisor at all times: no matter the quantity of employees. This is to ensure that contractor employees follow stated rules contained herein.

8. SITE INDUCTIONS

On returning to work after “the Lock-down” period, on the re-mobilisation of our clients’ sites, it is anticipated, that a “return to work” reinduction will be undertaken, taking into account the current national/global crisis

.

Site Management will reduce the number of people in attendance during site inductions and consider holding them outdoors wherever possible. This will provide further space and prevent overcrowding and the infection to spread.

Aston Crean will endeavour to provide manpower to site that has already attended previously and been inducted wherever possible to minimise the requirement for new inductions.

8. CHANGING FACILITIES AND DRYING ROOMS

With the support of staggered arrival times, this will assist the reduction of overcrowding in these facilities. However, should it be apparent they are for some reason overcrowded, be mindful of the number of site operatives using these facilities when attending and if overcrowded, wait outside until sufficient space is available and it should not compromise the 2 metres social distancing guidance.

All operatives should be patient during these trying times. Site Managers are to monitor these areas and ensure any tension or tempers are reduced.

10. TECHNICAL INFORMATION

Always refer to Government websites such as:

<https://www.gov.uk/coronavirus>

<https://www.nhs.uk/conditions/coronavirus-covid-19/>

<https://www.gov.uk/government/organisations/public-health-england>

These websites will always provide up to date information.

11. ACCESS AND EGRESS

All arrivals to site will be staggered to mitigate congestion of site operatives and reduce the risk of infection and achieve the 2 metres social distancing. This will be further supported by:

- Being mindful of the site access/egress routes and where congestion is observed, site employees will wait until this is clear
- Entry systems that require skin contact e.g. biometric scanners should not be used unless the scanner pad can be wiped using medicated wipes after each and every use. Where this cannot be guaranteed then sign in sheets are to be used with a pen provided by the operative.
- Hands are to be washed or sanitise before entering or leaving the site.
- A space of (2 metres) between people or colleagues is to be maintained whilst waiting to enter or exiting the site.

12. WASTE CONTROL

All operatives should have an abundant quantity of tissues about their person in the event that they sneeze or develop a cough. Once used, the tissues are to be placed in a plastic lined bin.

All waste bags are to be regularly emptied into the site skips. Bags must be complete with no holes. Wherever possible, other waste should not be placed on top of these bags to prevent them being damaged.

13. THIRD PARTY PROTECTION

Wherever possible, visitors are to be encouraged to not visit site. Meetings are to be held using conference call facilities. If a meeting must be held on site, then the 2m separation rule must be observed at all times. After a meeting has finished, the area is to be cleaned using medicated wash.

14. EMERGENCY ARRANGEMENTS

Should an event occur whereby an operative or colleague develops a high temperature (this means you feel hot to the touch on the chest or back) or a persistent cough (this means coughing a lot more than an hour, or 3 or more coughing episodes in 24 hours) whilst at work, they will advise the site management immediately and identify/advise the area where they were working and will fully comply with the following:

- Ensure they return home immediately, preferably wearing a face mask to aid in containing the virus.
- Do not go to places like a surgery, pharmacy or hospital.
- Ensure they avoid touching anything.
- Ensure they cough and/or sneeze into a tissue and put it in a bin, or if they do not have tissues, cough and/or sneeze into the crook of their elbow

They will then follow the Government's guidance on self-isolation and not return to work until the period of self-isolation has expired.

First-Aiders will still be required to carry out their role; however, whilst carrying out first-aid they will require to be wearing the following:

- Disposable FFP3 face mask
- Disposable latex or nitrile gloves
- Disposable plastic apron
- Plastic visor or eye protection that has been thoroughly cleaned and sanitised before and after each use.

If CPR is required then the following guidelines have been extracted from the latest Resuscitation Council UK Statement on COVID-19 in relation to CPR and resuscitation:

Because of the heightened awareness of the possibility that the victim may have COVID-19, Resuscitation Council UK offers this advice:

- Recognise cardiac arrest by looking for the absence of signs of life and the absence of normal breathing. Do not listen or feel for breathing by placing your ear and cheek close to the patient's mouth. If you are in any doubt about confirming cardiac arrest, the default position is to start chest compressions until help arrives.
- Make sure an ambulance is on its way. If COVID 19 is suspected, tell them when you call 999.
- If there is a perceived risk of infection, rescuers should place a cloth/towel over the victims mouth and nose and attempt compression only CPR and early

defibrillation until the ambulance (or advanced care team) arrives. Put hands together in the middle of the chest and push hard and fast.

- Early use of a defibrillator significantly increases the person's chances of survival and does not increase risk of infection.
- If the rescuer has access to personal protective equipment (PPE) (e.g. FFP3 face mask, disposable gloves, eye protection), these should be worn.
- After performing compression-only CPR, all rescuers should wash their hands thoroughly with soap and water; alcohol-based hand gel is a convenient alternative. They should also seek advice from the NHS 111 coronavirus advice service or medical adviser.

<https://www.resus.org.uk/media/statements/resuscitation-council-uk-statements-on-covid-19-coronavirus-cpr-and-resuscitation/covid-community/>

15. COMMUNICATION

This Policy will be updated regularly when any new advice is received from government sources.

The contents of this Policy is to be communicated to all site personnel at least once per week to ensure that the seriousness of this pandemic is kept at the forefront of all of the site workforce's minds.

Where there is a requirement for a meeting to take place, the preference is to undertake video/telephone conferencing. If this is not possible, where reasonably practicable, meetings are to take place outdoors. Only the absolute minimum of persons required to facilitate the meeting are to attend and all attendees are to ensure they observe the 2m rule.

16. PPE

Mandatory PPE for all operatives on this site will in accordance with the Principal Contractor's site rules. Additional PPE requirements for this work are:

- Face masks where required – FFP3 standard and face-fitted to the individual
- Latex/plastic/vinyl gloves where skin to skin contact cannot be prevented or surfaces are to be touched (door handles, kettles etc.)

17. CANTEEN/EATING ARRANGEMENTS

Whilst dedicated areas are provided, staggered breaks/lunches are to be put in place. If for some reason they become overcrowded, ensure food is always consumed outside

of all site/operational workplaces. 2 metres social distancing between site operatives is to be maintained.

If 2m distancing cannot be maintained the site management must be informed immediately so that alternative arrangements can be made.

Furthermore, the site workforce will comply as follows:

- Prior to consuming any food or drink, wash or sanitise hands for a minimum period of 20 seconds
- Site operatives will bring food or drink to site only and when it is required. Food is not to be stored in fridges. Where possible, hot drinks should be brought to site using flasks to help prevent contamination. If site cups are to be used, they must be thoroughly cleaned before use using hot water and washing up liquid.
- Kettles and microwaves etc are to be thoroughly cleaned each morning before use and regularly during the day. Where possible plates and utensils are to be cleaned in a dishwasher. If this cannot be done, it is advised that site employees bring their own disposable plates and utensils to site.
- Site employees are advised to remain on site and not leave the site during the hours the site is open to prevent the spread of the virus.
- Prior to leaving site we will ensure all personal waste is removed and placed in the bins provided and will wash our hands and/or sanitise.

18. COMFORT BREAKS

Comfort breaks should be minimised as much as possible during the day and ensure compliance with the below:

- Be mindful of the number of site operatives using the site welfare facilities when attending and if overcrowded, wait outside until enough space is available to not overly compromise the 2 metres social distancing given cubical sizing
- Wash hands before and after using the facilities and sanitise where no soap is present. If no soap is available, report this to the site manager to enable replenishment.
- Use the rubbish bins for hand towels.

19. SITE DELIVERIES

When taking or receiving deliveries, management will ensure Delivery Drivers remain in their vehicles provided the load will allow it. If not, we will ensure they wash or sanitise their hands before unloading goods and materials.

20. INSPECTIONS & MONITORING

Aston Crean Site Management are to continually monitor these conditions.
Cooperation is requested from the workforce to monitor their works, ensuring that these measures are implemented.

Aston Crean Safety Advisors (Settle for Safety Ltd) will also monitor the site working practices and will provide advice and guidance where necessary.

Signed:



Daniel Hunt
Contracts Director

Date: 22/09/2025

ASTON CREAN UK LTD

MENTAL HEALTH & WELLBEING POLICY

Aston Crean UK Ltd recognise the detrimental impact that mental ill-health can have on employees' lives. Aston Crean UK Ltd has a longstanding commitment to support our staff's mental health and wellbeing and to create a healthy, supportive, and positive work environment. Aston Crean UK Ltd views its staff as its most valuable resource and recognises that maintaining and fostering a positive mental health culture in the workplace can lead to benefits for both the organisation and the employees. This policy applies to all staff members of Aston Crean UK Ltd.

Definition of Mental Health

The World Health Organisation defines mental health as: A state of well-being in which the individual realises their own abilities, can cope with the normal stresses of life, can work productively and fruitfully and is able to make a contribution to their community. Aston Crean UK Ltd recognises that mental ill-health can manifest in different ways. Some employees may experience no physical side-effects while others may experience physical symptoms.

Policy Objectives

The objectives of this policy are to:

- Demonstrate compliance with legal obligations outlined in the Health and Safety at Work Act 1974 and the Equality Act 2010.
- Increase mental health awareness and tackle the stigmas associated with mental ill-health.
- Eliminate or mitigate organisational risk factors in relation to mental health (e.g. bullying, stress, discrimination or harassment), wherever possible.
- Ensure the provision of adequate resources and supports for employees who are suffering from mental ill-health.

Responsibilities

Top Management

- Ensure that this policy is communicated to all Aston Crean UK Ltd employees.
- Ensure training is provided to managers to enable them to identify and respond to workers who require support related to mental health.
- Review on a routine basis the adequacy of resources and supports in place for employees suffering from mental ill-health.

Managers & Supervisors

- Ensure staff are fully trained to discharge their duties.
- Ensure staff are provided with meaningful developmental opportunities.
- Monitor workloads to ensure that people are not overloaded.
- Monitor working hours and overtime to ensure that staff are not overworking.
- Monitor holidays to ensure that staff are taking their full entitlement.
- Ensure that bullying and harassment is not tolerated within their jurisdiction.

Human Resources

- Give guidance to managers on the Mental Health & Wellbeing Policy. Assist in monitoring the effectiveness of measures to address stress by collating sickness absence statistics.
- Advise managers and individuals on training requirements.
- Provide continuing support to managers and individuals in a changing environment and encourage referral to occupational workplace counsellors where appropriate.

Signed:



Daniel Hunt
Contracts Director

Date: 22/09/2025