# Social policy Heras Group

**Experts in perimeter protection** 



# Introduction and guiding principles

This document covers the way Heras Group looks to social standards in Heras and is the base for the local companies to build up a local detailed policy based on these principles aligned to local legislation.

#### Introduction

Heras is committed to reaching the highest standards of corporate, individual and ethical behaviour as part of our day-to-day working lives. This document provides employees with a simple guidelines on expected behaviours and underpins the trust between employer and employee.

All employees must comply with Heras policies. These include a Health & Safety Policy as well as a range of others that encourage safe, considerate and compliant working.

Whilst every effort has been made to cover all eventualities, there may be situations where management discretion will be exercised, in line with the local law.

#### **General conduct**

Heras requires the highest standards from its employees in their performance at work and their general conduct when dealing with internal colleagues and external stakeholders or customers.

Employees are expected to act in a professional way and be diligent, honest, polite and ethical when performing their duties. Each employee is responsible for following company policies, not breaking any legislation, or damaging the reputation of the company.

Employees are prohibited from conducting any business activity of the types carried out by the Company either on their own account or for any party other than Heras. Employees are not permitted to engage in any other work or employment unless specific permission for this to occur has been given in writing by a Senior manager and HR.

All employees must maintain confidentiality at all times and must make themselves aware of the Code of Conduct Policy and Anti-Bribery and Corruption Policy.

# Working practices - the basics

# How will I be paid?

You will be paid monthly directly into your bank or building society account. Heras will always follow the standard following out of the collective labour agreements with sector or local unions. In the event of an over or under payment, or if you have any queries about your monthly payment, please speak initially to your line manager and or HR.

# What deductions are, or can be made from my salary?

Depending how it works in your country deductions from salary will be made for national insurance, income tax, pension contributions, items agreed with us and authorised by you and items required by or under any Statute (including attachment of earnings orders). The Company at any time during or at the end of your employment reserves the right to deduct from salary any overpayment made to you and/or monies that you owe to us. This includes but is not limited to any: excess holidays taken, overpayment of sick pay; the value of Company property (for example, mobile phone, laptop, special key (cards),...) entrusted to you but not returned on request or on termination of your employment and the recovery of any losses for which you are responsible. In the event of any overpayment of wages, amounts will be recovered either in the next salary or over an agreed number of future salaries for large amounts. This will be agreed based on the nature and amount of the repayment. In the event that someone is leaving the business, overpayments will be taken from the last month's pay. Underpayments of wages will be rectified in the next salary payment.

What personal records will be kept? Throughout your employment and for as long a period as is necessary following the termination of your employment, the Company is required to maintain information about you for purposes connected with your employment. Please refer to the Company's "GDPR Privacy Notice" Policy for full details.

All details will be stored in compliance with the Data Protection Act 2018 (GDPR). Employees may submit a written request for access to view their personnel records. The Company will not release any information relating to any current or past employee until an official request has been made in writing. Similarly, any requests for references must be made in writing and will be dealt with directly through the HR Department. References will only confirm start and end dates, reason given for leaving and position held.

# What are my hours of work?

Details of your contractual basic hours of work are contained within your written statement of terms and conditions of employment. We expect that you will be able to finish your work within your normal working hours. However, you may be required to work overtime if it is necessary for the proper performance of your duties or the needs of our business. This may include work on Saturdays, Sundays and public holidays. Overtime may be required at short notice, although we will try to give you as much notice as possible. If you are eligible to be paid for overtime, it's stated in your contract and, if so, the rates which are payable.

#### What do I do if I am unable to attend work?

Any employee who is unable to attend work must contact their line manager at the start of the first day of absence. If the manager is unavailable, HR should be notified. It is the employee's responsibility to report all absences to ensure that work schedules and calls can be redirected. Any unauthorised or non-notified absence will be unpaid. Please refer to your Country HR-contact for full details along with specific sick pay agreements.

# What if there are any permanent changes to my work?

In order to address the changing needs of the business, the Company reserves the right to amend your hours to meet business needs. If this need arises, the necessary consultation will take place and you will be given adequate notice and time to discuss how these changes are going to affect you.

#### What breaks am I entitled to?

Your hours of work and the arrangements for breaks depend on a number of factors, along with obligations placed upon the Company to ensure compliance with the Working Time Directive. Your manager will explain these fully to you.

# Is there a Company pension scheme?

We refer to local Handbook or HR to explain you how your Pension scheme is build up.

# Will references from my last employer be taken?

Any offer of employment is subject to receipt of satisfactory references. Efforts will be made to obtain references prior to commencement of employment, however, this may not always be possible. This will always be done in line with local legislation.

### What is a probationary period?

All new employees' contracts will be subject to successful completion of a probationary period as outlined within your terms and conditions of employment and local legislation. During this period, the Company will review your performance and ensure they are satisfied that you are competent and capable of undertaking the role. It is important during this period that you also provide feedback to your line manager and make them aware of any issues which may be impacting your performance. At the end of the probationary period you will be informed whether your role has now been made permanent.

# Do you offer salary reviews?

Salaries are reviewed annually although there is no automatic entitlement to an increase. Whilst we always endeavour to reward performance and effort, it must be borne in mind that we have to take into account other factors, including our profitability. The results of the salary review will be confirmed to you in writing.

#### What is the dress code?

Dress code is business casual.

# **During your employment**

During your employment - you must follow all instructions given by us to you, devote your full time, skill and attention to your duties and promote and protect the best interests of our business;

Not without prior consent:

- Engage in any other business whatsoever
- Directly or indirectly be engaged, concerned or interested in any business, organisation or venture which competes with our business or directly or indirectly engage in any activities which harm or damage our business

# **Commitments and contracts on behalf of the Company**

All purchases must comply with the Company's procurement procedures. You are not authorised to make any commitment or to sign any contract or agreement on behalf of the Company unless you have written approval from the local Management Team. Should you sign any document without authority, this may be treated as gross misconduct. In addition

you may incur a personal liability to the supplier. Please refer to the Procurement department for full details on the Company's procurement procedures.

#### **Customer service**

Whatever your role in the Company, it is your responsibility to treat our customers and colleagues with respect and to make every effort to address all reasonable requests.

### Eating at work

Food is not to be eaten in any public areas. Any unwanted food should be properly disposed of in the food waste bin.

#### Insurance

The Company has Employers Liability Insurance in place, as required by law. Notification of any claim under this insurance must be reported immediately to the local Finance Manager.

#### Notice boards

It is your responsibility to read all organisational announcements and notices on the official notice board and email to comply with their requirements in so far as they relate to your conditions of employment. Alleged ignorance of any notice will not be accepted as an excuse for non-compliance.

#### **DVLA check and vehicle documents**

All employees that use their own vehicles on company business, drive a company vehicle or receive a car allowance are required to follow the Company Car Policy. Please see HR or the fleet coordinator for further details.

# **Company supplied equipment**

Any equipment issued to employees for the purposes of carrying out their roles (e.g., PPE, mobile phones, laptops etc.) remain the property of the Company and must be returned upon request or upon leaving the Company. The Company reserves the right to recover the cost of any items not returned.

# Office management

We wish to present the Company as a professional organisation. To help achieve this, we ask that you observe our 'clean desk' policy and ensure your office or workspace is kept clean and tidy and working materials are kept in a neat and tidy condition at all times.

### Security

Security is of critical importance and you are expected to do all that you can to keep our premises and possessions secure. You should:

- Maintain your desk, filing cabinets and other office property under your control in good order;
- Clear your desk or work area and lock away all work, and portable equipment (such as computer, laptops, and calculators) and valuables at night;
- Abide by any security instructions in issue at your place of work or at a customer's premises;
- · Report anything that arouses suspicion;
- Not keep any personal possessions and valuables on our premises, except where absolutely necessary.

Visitors- You must not let anyone onto our premises except in the normal course of business. All visitors must sign in before entering our premises.

# **Use of company property and facilities**

It is important that you take care of our property. Any misuse, damage or loss of any of equipment may be considered as misconduct or gross misconduct, which could lead to your dismissal. We will provide you with all the necessary equipment to enable you to carry out your role. This equipment is our property and must not be removed from the office without the express permission of your line manager. You must take all reasonable steps to keep our property in good order and prevent it from being lost, stolen or damaged. Any lost, stolen or damaged equipment must be reported to your line manager and IT immediately.

# **Health and safety**

Heras is committed to providing and maintaining a safe environment for its employees and others who may be affected by the Company's activities or on Company premises. We are also committed to minimising our impact on the environment and to comply with our obligations under environmental law.

Working safely - As employees we have to take reasonable care for the Health and Safety of ourselves our colleagues and others who may be affected by our actions. Please refer to the Company's "Health & Safety" Policy for full details.

# Confidentiality

You have a personal responsibility to protect and maintain confidentiality of both Company and customers' information. You must ensure the safe custody and accuracy of documents, records, money and other items which come into your possession during the course of your work which are the property of the Company, a colleague, a customer of or supplier to the Company. You must, at all times, observe strict confidentiality with regard to the affairs of the Company and in particular you must not make any statement concerning the business of the Company in circumstances in which it is likely to become public other than where you have advanced authorisation from the Company to do so.

You must at all times strive to avoid any actual or potential conflicts of interest with the Company. Conflicts of interest may arise when an employee has a direct or indirect interest in a news source, customer, supplier, or other Company dealing with the Company including of such companies where, in the Company's determination, such interest affects the employee's actions in making judgements or decisions for the benefit of or on behalf of the Company. This obligation continues after the end of your employment unless and until any such information becomes available to the public except by a breach by you of this provision. Disclosing or misusing information during your employment with us may be regarded as gross misconduct and will be dealt with under the Company's disciplinary procedure. Please refer to the Company's "Code of Conduct" Policy for full details.

# Information technology

### **IT Policy**

Either at the point of joining the Company, or at the point you are provided with IT equipment and/or access to equipment, you will be required to accept that you are aware of the rules and obligations placed upon you in using such equipment. Please refer to your Country HR-contact for full details about policy.

#### **Emails and Internet**

Email is a quick and effective way of communicating with colleagues and customers. It should not be used to send inappropriate messages or comments. The Company will allow reasonable personal usage of emails/internet usage in line with the Company's IT policy, a copy of which is available from HR. The Company reserves the right to review individual's e-mail/internet usage.

### **Computers and Data Protection**

Our policy is to comply with all laws regulating computers and data protection. It is important that you minimise any exposure to risk due to careless practices concerning the use of data or inappropriate or illegal use of software. If you are supplied with computer equipment, you are responsible for its safety. You are also responsible for the security of software and data stored either on your own system or other systems that they can access remotely and must:

- Keep confidential any personal passwords
- Not use computer system to access information that is not relevant to your job in excess
- Comply with all policy documents relating to the use of computers.

# **Computer and Data Security**

Any employee who uses Heras computer equipment must be aware of and comply with all of the requirements contained within the Company's published IT and Social Media Policy.

Use of the Internet, emails and groups such as WhatsApp by employees via Heras computer equipment or mobiles, is to be primarily for the Company's business purposes. It is forbidden for any employee to run personal or unofficial software on Heras computer equipment or, conversely, to enter any Company data to a privately owned computer system. All computer software used on Company premises or on the Company's behalf must be approved for use by Group or Country management.

Any employee who attempts to gain unauthorised access to any Company, personal or other confidential information stored on a data processed file or other storage system, or discloses an individual's personal data in breach of the GDPR principles, is liable to summary dismissal.

Unless, exceptionally, specific authorisation is given in advance by Group or Country Management, no employee is permitted to undertake any work on behalf of the Company on any computing device that is not owned by Heras.

Knowledge of any computer password or security access codes must be treated as strictly confidential and never disclosed to any unauthorised person. It is forbidden for employees to introduce or use any personal computer password or security access code to any item of hardware equipment or software being utilised by the Company unless full details have previously been communicated to and confirmed as authorised for use by the Steering Team. Downloading software from the internet or other sources onto Company equipment without prior approval from the Steering Team or Group is strictly prohibited. Breach of this rule may result in dismissal.

Each item of computer software utilised within the Company is subject to individual licensing agreements, which must be adhered to when using the software in question, recognising the copyright interest vested with the owners of the software. The restrictions in operation disallow any unauthorised copying, reproduction, transmission or other method of distribution of the software without the prior written consent of the relevant author or publisher.

# Blogging and social media

In order to protect the Company brand and project a clear and consistent message to customers, partners, and employees, it is necessary to establish guidelines regarding employee blogs, social media and other websites. As a general rule, the following are not permitted:

Creating blogs for employees using Company resources, including but not limited to computers, websites and time. Should there be a legitimate business need to create a blog or access a social media site you must discuss the need with your immediate manager

and receive their authorisation to proceed

Additionally, any time you access social media or blog, whether or not for a work-related purpose, you are required to comply with the following guidelines:

- Remember you are personally and legally responsible for the content you publish on social media sites:
- At no time should confidential information regarding the Company or its customers be
  disseminated. It is critical that you maintain confidentiality and confidential customer
  information and abide by the terms of any confidentiality agreement(s) that you have
  signed. Likewise, you may not use the Company logo's, graphics, trademarks, trade names;
- All copyright and financial disclosure laws, along with any agreements that you had with the Company must be adhered to and respected;
- When you are engaged in personal electronic media activity that is not related to your job
  responsibilities, you should do so using a personal e-mail account. Company-provided
  e-mail accounts or e-mail accounts that identify you as a Company employee, should not
  be used either to access such services or to identify yourself on such social networks;
- If you identify yourself as an employee of the Company on a social media site, be clear that you are expressing your personal opinion and not the opinion of the Company;
- When you are discussing the Company or your position at the Company online, you must take care to follow the Company's standards of conduct and its policies including, but not limited to, its policies against workplace harassment and discrimination;
- As a general matter, employees engaged in social media activity, (whether or not work-related), may not make statements that are maliciously false, threatening, harassing, or defamatory toward the Company, its operations, employees, or its customers.

If anyone is found to have disclosed confidential information, violated the above guidelines or defamed any Company employees, contractors or customers, they may be subject to legal or disciplinary action, up to and including termination.

# **Holidays**

The holiday year run is depended from country to country. Through local HR systems holidays must be requested in advance and Line Managers have the right to refuse any holidays due to business needs. Full entitlement should be taken as entitlement cannot be carried over into the next year except in case of country specific legislation. No payment in lieu will be made without the express permission of Group or Country Management after consideration of the provisions of the Working Time Regulations, and any holidays not taken within the agreed period will be lost. Details of your holiday entitlement are contained within your written statement of terms and conditions. Please refer to the Company's Country Handbook for full details.

# Time off work

#### Attendance at Work

The Company aims to secure the full attendance of all employees throughout the working week. Absence due to sickness may sometimes be necessary, but frequent absence is a problem for the Company and will be reviewed on an ongoing basis in order to ensure a consistent approach to the management of absence. Please refer to your Country HR-contact for full details about policy. Failure to comply with this procedure may result in disciplinary action.

# **Clocking Procedure**

Depending on where you work at Heras it may be that you're are required to record their attendance on site using the clocking in system or signing in and out at the start and end of work, and any time an employee leaves the premises (including the lunch break).

# **Home working**

It may be appropriate for some employees to work from home; this must be arranged with their line manager prior to the event and diaries should be updated to reflect the home working. Employees are responsible for ensuring they have adequate facilities to ensure home working is achievable and a quiet and undisturbed work station is available. Please refer to the Company's Working from Home Policy.

# **Leaving the Premises during work**

For security and health and safety reasons you are required to notify your line manager in the event that you leave the office/site during your normal working day. In such instances you should inform your line manager of the time you will leave the premises and when you are due to return.

#### **Bereavement Leave**

Should you suffer the loss of a family member, leave may be granted. The rules relating to payment for bereavement can be obtained from the HR Department.

# **Time off for Dependants**

From time to time you may need to be absent from work for a specific family or domestic reason. These matters are normally short-term and it may be possible to change your day off or swap with someone else to accommodate such leave. You will have the right to take reasonable time off during working hours to deal with incidents involving dependants. The right should only be exercised in cases of extreme urgency. Please refer to your Country HR-contact for full details about policy.

Parental/Maternity/Paternity/Adoption/Shared Parental Leave - You may be entitled to maternity/ paternity/adoption/shared parental leave and pay in accordance with current statutory provisions. Please refer to the Countries "Maternity, Paternity, Parental, Adoption Shared Parental Leave" Policies for full details.

# **Medical Appointments**

Wherever possible, dental and medical appointments should be made outside working hours. You must give as much notice as possible to your line manager and produce evidence of the appointment if requested. Attending appointments will be subject to the needs and requirements of the Company. However, permission will not be unreasonably refused. Please refer to the Countries "Absence and sickness" Policy or Employee Handbook for full details.

# Statutory leave/public duties

It is your responsibility to notify us if you carry out public duties and/or are summoned for jury service. You are expected to give us as much notice as possible of any proposed time away from the workplace. If you are not required at Court during any part of your jury service you must attend work whenever you reasonably can.

The Company will allow reasonable time off for these duties and this will be unpaid. You are expected to claim any allowances and payments that may be available from the Court whilst carrying out these duties. Our releasing you for public duties will also depend on the needs of our business at the time you require the leave. Please refer to the Company's "Absence and sickness" Policy or Employee Handbook for full details.

### **Works Injuries**

All works injuries and near misses must be reported to a qualified first aider unless the seriousness of the injury makes this impossible. All accidents at work must be recorded with adequate detail in the Accident Book and reported to the HSE-Q Manager. Failure to report an accident may invoke the disciplinary procedure.

### **Statutory Sick Pay**

The rules governing this are laid down by the Country Government and you may qualify for statutory sick pay. Please refer to the Company's "Absence and Sickness" Policy or Employee Handbook for rules relating to your entitlement to Statutory sick pay.

# **Occupational Health and Health Surveillance**

Some employees will be required to attend a medical where consideration will be given to the nature of the role for which you have been employed and your current health. In addition, you may be required to attend ongoing health surveillance appointments throughout the course of your employment and attend a final medical prior to leaving the Company. The type and frequency of health surveillance will be based on the role for which you are employed in and will be undertaken by Occupational Health. Any information relating to an employee's medical condition or history will be kept strictly confidential and will be disclosed only to those with a business need to know or as required by law. With your agreement, the Company reserves the right to request further information from your GP or medical practitioner. Please refer to the Company's "Occupational Health" Policy or Employee Handbook for full details.

# **Employee services**

Induction - When you join the Company, it is important that you learn the Company's practices and procedures so that you integrate within the Company as quickly as possible. As a new starter, you will go through an induction programme that will give you the information to carry out your job role. Following the induction and period of initial training (as appropriate) the HR department will review and identify, in conjunction with your line manager, any further 'on the job' training that needs to be addressed. Induction programmes will vary according to the job to which you have been recruited and the department you will be operating in.

Training - It is a condition of your employment that you undertake training or re-training and attend courses, as required throughout your career with us.

The training that you can expect when you first join us is:

- Company induction
- Health and safety
- · Specific work related training
- Other work related training programmes

You may be required to do such training on or off-site. Where possible, sufficient notice for all off site training will be given by the Company and individual circumstances will be taken into consideration. As part of your normal job functions, you are expected to be involved in the training or re-training of new or existing employees. In all cases, your contractual rates of pay will be maintained, and all reasonable out of pocket, expenses will be reimbursed on production of receipts. Please refer to your Country HR-contact for full details about policy.

# **Lost Property**

If you lose, mislay or suspect that any items of your personal property have been stolen whilst on Company premises, you must report the loss immediately to your line manager. If you report missing property, the Company may instigate a search. If you find any lost property, you must notify your line manager.

# **Expenses**

Employees are able to claim expenses following the expenses procedure. All travel should be booked at the best available rates/fares and within timescales to ensure the most cost

effective fees. All expenses should be submitted monthly and authorised by the appropriate line manager. Hotels should be booked through the purchasing team. Please refer to the Company's "Expenses and travel" Policy for full details.

# **Company Vehicles**

If you have responsibility for a Company vehicle, you must immediately report any accidents to your line manager. Where negligence is suspected or the accident has not been reported, an investigation will take place and any necessary action taken under the Company's disciplinary procedure. Please refer to the Company's Carpolicy for full details of the obligations placed upon employees.

#### Recruitment

Where possible job opportunities within the Company are advertised internally or concurrently with external advertising. All new appointments will be subject to satisfactory references being obtained and your contract of employment. The Company relies upon the accuracy of information contained in the employment application, as well as the accuracy of other data presented throughout the hiring process and employment. Any misrepresentations, falsifications, or material omissions in any of this information or data may result in the Company's exclusion of the individual from further consideration for employment or, if the person has been hired, termination of employment. Please refer to your Country HR-contact for full details about policy.

#### Retirement

The applicable retirement age is related to Country legislation. If you are intending to retire. Please refer to your Country HR-contact for full details.

#### **Trade Unions**

Trade unions and collective bargaining differs from country to country. Please refer to your country HR department to know which regulations are applicable in the local countries.

# **Policies**

# **Disciplinary procedure:**

The Disciplinary Procedure exists to encourage employees to observe and adhere to the standards established as being necessary for the efficient operation of the Company's business. The Disciplinary Procedure provides a fair and consistent method of correcting

conduct and maintaining standards. Please refer to your Country HR-contact for more details.

# **Grievance procedure**

The grievance procedure exists to ensure that an employee who has a grievance regarding any aspect of their employment has the opportunity to raise the issue in order to seek a solution to the problem. The grievance procedure is intended to enable the employee to raise issues with management about their work or about actions of the Company, clients/customers or fellow workers that affect the employee. It is impossible to provide a comprehensive list of all the issues which might give rise to a grievance, but some of the more common ones include: terms and conditions of employment, health and safety, relationships at work, new working practices, organisational changes and equal opportunities. Please refer to your Country HR-contact for full details.

## Whistleblowing procedure

The company wishes to allow employees, without impediment or detriment to their employment, to make disclosures about aspects of their work including the organisation as a whole and/or those concerning fellow members of staff or volunteers. Whistleblowing is when someone raises concerns, usually relating to misconduct or malpractice that has happened in the past, is happening now or they fear may happen in the future either within the organisation they work for or externally. Please refer to the Company's "Whistleblowing" Policy for full details.

# Diginity at work

Everyone has the right to be treated with respect. The Company recognises that harassment can have a devastating effect on the health, confidence, morale, and performance of those affected by it. All employees are entitled to a working environment that respects their personal dignity and is free from such objectionable conduct. It is everyone's responsibility to make sure that no job applicant, existing member of staff or customer is treated less favourably on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation, and that no one is treated in a way that cannot be shown as fair. If, at any time, you need some help or advice then please do not hesitate in contacting your Manager or the HR Department.

# **Equality and diversity**

The Company endorses the principles of equality and diversity and has practices and policies to promote and help this in practice. The Company will protect individuals from discrimination if they have a protected characteristic as: age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, and pregnancy and maternity.

### **Safeguarding**

The Company aims to provide at all times, a safe setting for any child or young person under the age of 18 or any adult at risk. It will encourage best practice in Child Protection and Safeguarding matters in a spirit of partnership and openness with all children, their families and local agencies. All staff have a part to play in helping to fulfil these aims and are encouraged to participate in the training provided by the Company in this regard. Please refer to your Country HR-contact for full details about local policy.

#### Code of conduct

The Company wants to have a solid and durable relationship with its employees, customers, suppliers and the communities within which we live and work, along with government and the public at large. It is our policy to always deal with all customers, stakeholders and colleagues honestly, responsibly and with integrity. The reputation of the Company depends on the abilities of our employees in developing the business. The policy sets forth the basic principles with which you are required to comply in your dealings with all stakeholders in our Company, whether fellow employees, customers, suppliers, shareholders or the public. Please refer to the Company's "Code of Conduct" Policy for full details.

Gifts and gratuities - The acceptance or offer of gifts, gratuities, loans or matters of a similar nature with any third party, whether from individuals or corporations, that does business with the Company is strictly forbidden unless it is, whether giving or receiving, reasonably and properly identified as being consistent with accepted business practice and does not appear to have the potential to influence the relationship with the third party. Advance approval from your line manager is required before you may accept gifts of any kind from customers, suppliers, or vendor representatives. Where there is any doubt as to the propriety of such giving or activity, you must contact your line manager or the HR Department. Please refer to Code of Business Conduct for more details

Receiving hospitality and entertainment - In order to network and maintain business relationships, it is often necessary for employees to attend events and functions on behalf of Heras. Hospitality, or entertainment, should only be accepted if there is a need to maintain current, or foster future, working relationships. All events attended must be pre-agreed by your line manager. Heras operates a Drug & Alcohol Policy, which prohibits the drinking of alcohol by employees in the workplace other than reasonable drinking of alcohol in connection with approved social and business functions.

Heras regards drinking to an 'unreasonable level' as any of the following situations:

- The individual is over the legal limit stipulated for driving (i.e. 35mcg/100ml of breath alcohol concentration) and returns to the work place;
- In the opinion of management, the individual's performance is impaired. This may be at less than the legal limit stipulated for driving;
- In the opinion of management, the individual's behaviour may cause embarrassment, distress or offence to others

An employee who attends a function where alcohol is available must ensure they conduct themselves in a professional manner. Any employee who breaks the law as a result of alcohol may be subject to disciplinary procedures and potential dismissal. Employees must not drive under the influence of alcohol and anyone found to do so may be subject to Gross Misconduct within the disciplinary procedure. Please refer to your Country HR-contact for full details about policy.

Anti-bribery and corruption laws - Heras expects its employees to be aware of, and abide by, the legislation and company policy regarding Anti-bribery and corruption. For further guidance on Gifts and gratuities, Receiving hospitality and entertainment, Anti-bribery and corruption laws, please refer to the Company's "Anti-Bribery and Corruption Policy" for full details.

# Performance/progress appraisals

Every employee is entitled to have yearly feedback. Therefor at least once a year there will be a formal performance review where the line manager as well as the employee can give their feedback. Depending on the function there will as well be a mid-year review. It's recommend to create a process of continuous feedback. Please refer to your Country HR-contact for full details about policy.

In order to assist in the assessment of the training needs of the company, a system of performance appraisals will operate for all employees. Temporary employees will be subject to continuous assessment. A formal review will be carried out covering the employee's skills, performance and general conduct. The formal review will examine:

- Health & Safety
- Compenteces
- Performance (objectives)
- Training and development needs
- General conduct while at work

If the individual is not making satisfactory progress in each of these areas during the probation period then their contract may be terminated by giving the required notice period. Communication with employees who are not performing at the desired level will be more frequent to make sure that they are aware of areas where improvement is expected.

# **Termination of employment**

An individual's employment will continue with the Company unless or until:

- The individual gives the Company the requisite period of notice of their termination of employment;
- The Company issues the obligatory notice period to the individual, other than for gross misconduct where dismissal can have immediate effect.

# **Notice period**

Due to the nature of the role some individuals will be subject to longer periods of notice. If you are unsure of your notice period, please refer to your contract of employment or to your HR Department.

#### **Exit interviews**

All employees who resign from the company are required to complete an exit interview with HR, the purpose being to understand the reasons why an employee has resigned from the company and to gain constructive feedback.

#### References

Providing a reference involves the disclosure of personal data of the individual who is the subject of the reference. So that we can ensure we protect our employees' data no references (whether to prospective employers or other institutions) should be given.

References are only supplied by the HR Team, any line manager who receives a reference request should forward to these HR immediately. It is our policy to only provide factual information and always after approval of the employee.

This Policy does not prevent any employee giving a reference in a personal capacity but employees should make clear that such references are personal and not on behalf of the Company and, if the reference is given on paper, that neither the Company's name, address or logo appear on the paper.

Published by Heras

Contact Person Country HR Manager

Purpose Ensure transparent and compliant business conduct

Application / Distributed to All employees

Classification Public

Monitoring Executive committee

Version V\_1.1

Signed off by / on Board Heras

