

TO PROVIDE SERVICE AND QUALITY WITHOUT COMPROMISE









AKC Woodend Horseshoe Hill Littleworth Common Bucks SL1 8QE

Tel. 01628 669777



1. Statement of Policy

The aim of this policy is to communicate the commitment of the Chief Executive and Board of Directors/Senior Management Team to the promotion of equality of opportunity in AKC.

It is our policy to provide employment equality to all, irrespective of:

- . gender, marital or family status
- . religious belief or political opinion
- . disability
- . race1 or ethnic origin
- . nationality
- . sexual orientation
- . age

We are opposed to all forms of unlawful and unfair discrimination. All full-time and part-time employees and job applicants (actual or potential) will be treated fairly and selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability.

We recognise that the provision of equal opportunities in the workplace is not only good management practice, it also makes sound business sense. Our equal opportunities policy will help all employees to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the organisation.

Throughout the document the word "race" is to be understood, in line with the Race Relations Order, to include colour, race, nationality or ethnic or national origins. Irish Travellers are recognised by the Order as being members of a racial group.

At AKC we are committed to:

- . preventing any form of direct or indirect discrimination or victimisation
- . promoting equal opportunities for women and men
- . securing fair participation for Catholics and Protestants
- . promoting equal opportunities for people with disabilities
- . promoting equal opportunities for ethnic minorities

. promoting a good and harmonious working environment where all men and women are treated with respect and dignity and in which no form of intimidation or harassment will be tolerated

. fulfilling all legal obligations under the relevant legislation and associated Codes of Practice

. taking any necessary positive/affirmative action, including setting goals and timetables

Breaches of our equal opportunity policy and practice will be regarded as misconduct and could lead to disciplinary proceedings.

This policy is fully supported by senior management





Implementation

The Managing Director has specific responsibility for the effective implementation of this policy. Each director, manager and supervisor also has responsibilities and we expect all of our employees to abide by the policy and help create the equality environment which is its objective.

In order to implement this policy, we will ensure that:

. The policy is communicated to all employees, through induction training, and made known to job applicants.

. Managers and supervisors are aware of their responsibilities through appropriate and regular training.

. An equal opportunities programme will be developed and will include a range of initiatives, indicating where appropriate affirmative/positive action, with targets and timetables.

. Appropriate training and guidance will be provided, including training on induction and management courses. In particular, all those involved in assessing candidates for recruitment or promotion will be trained in nondiscriminatory recruitment and selection techniques.

. Consultation will take place with recognised trade unions/employee representatives on the implementation of this policy and any amendments to practice.

. An information system will be established to assist the effective implementation of this policy and guidelines will be drafted for assessing the provision the equality of opportunity.

. Adequate resources are made available to fulfil the aims of this policy.

Affirmative Action

Where appropriate, lawful positive action measures such as special encouragement in advertisements or special training will be developed. These measures are available to us in certain circumstances, for example where there is an underrepresentation of a particular group in specific areas of work.

Monitoring and Review

The provision of equality of opportunity between women and men, irrespective of ethnic background or disability, will be monitored through the collection and analyses of statistical data on the community background, ethnic background, sex, marital status, family status and status as a disabled person of all full-time and part-time employees and job applicants. We will also monitor our workforce composition and undertake periodic reviews as required.

Progress on the implementation of this policy and any equal opportunities and affirmative/positive action programmes will be reviewed annually in consultation with the recognised trade unions/employee representatives. A joint employer/employee equal opportunities committee will be established for this purpose.



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Complaints

Employees who believe that they have suffered any form of discrimination, harassment or victimisation are entitled to raise the matter through the agreed procedures. A copy of these procedures is available from the managing Director. All complaints of discrimination will be dealt with seriously, promptly and confidentially.

These internal procedures do not replace or detract from the right of the employees to pursue complaints under the Sex Discrimination, Disability Discrimination or the Race Relations Act to an industrial tribunal or Fair Employment Tribunal. Information on definitions of discrimination and time limits for raising complaints are set out in the Annex to this statement.

Every effort will be made to ensure that employees making complaints will not be victimised. Any complaint of victimisation will be dealt with seriously, promptly and confidentially. Victimisation will result in disciplinary action and may warrant dismissal.

Direct Discrimination

Direct discrimination occurs when a person is treated less favourably than another on the grounds of their sex, marital status, religious belief, political opinion, race, nationality or ethnic/national origin.

Indirect Discrimination

Indirect discrimination can occur when a requirement or condition, which cannot be justified on grounds other than sex, marital status, religious belief, political opinion, race, nationality or ethnic/national origin, is applied equally but has the effect in practice of disadvantaging a considerably higher proportion of persons in one or other of the above groups.

In order to establish a complaint of indirect discrimination, an applicant must show the following:

(i) that a requirement or condition has been applied;

(ii) that the said requirement or condition adversely impacts against the person because of his/her religious belief, political opinion, sex, marital status, race, nationality, or ethnic/national origin;

(iii) that he/she has suffered detriment by reason being unable to comply with the condition or requirement.



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Disability Discrimination

Disability discrimination occurs when, for a reason related to his/her disability, a disabled person is treated less favourably than other people, and this treatment cannot be justified. It also occurs when an employer fails to comply with the duty to make a reasonable adjustment in relation to the disabled person, and the failure cannot be justified. An employer cannot justify less favourable treatment if, by making a reasonable adjustment, it would remove the reason for the treatment.

Victimisation

Victimisation occurs when a person is treated less favourably than another because that person has, for example, asserted rights under any of the discrimination laws or has helped another person to assert such rights or given information to the relevant statutory body, or because it is suspected that the person might do any of these things.

Complaints

Complaints of sex/marital status, race/nationality/ethnic/national origin, and disability discrimination should be lodged with the industrial tribunal within three months from date of the alleged act of discrimination.

In respect of equal pay, the complaint can be lodged at any time while the person is in the job or within six months of leaving a job.

Complaints to a fair employment tribunal must be lodged within three months from which a complainant first knew, or might reasonably have known, of the act of discrimination or within six months from the date the act occurred, whichever is earlier.



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Ethical Policy

Our ethical policy guides our day to day work.

AKC supports businesses, organisations and individuals who

- employ fair trade methods
- promote human rights issues
- aim to improve the quality of life of and support people within their community and/or on a wider scale
- provide education services to people within their community and/or on a wider scale
- practice equality and fairness at work and provide a good working environment for their colleagues
- use methods of working which are beneficial to the environment (such as recycling, energy efficiency, organic farming etc)
- support local trade
- provide honest and open customer services

AKC does not support businesses, organisations or individuals who

- exploit basic human rights.
- manufacture tobacco
- · manufacture chemicals which are persistent in the environment
- harvest unmanaged natural resources (such as timber or fish)
- employ intensive farming methods
- trade arms

Employees

Every AKC 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 behaviour and show individual initiative in combination with a high degree of knowledge and e xperience of our services.

Customers

Everybody must play their part in providing quality and efficiency to customers. AKC 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

AKC believes in supporting UK trade and therefore strives to buy from UK based manufacturing companies. AKC will aim to develop relationships with our 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 Counts standards and feedback given to suppliers on a quarterly basis.



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Community

AKC seeks to comply with all legislation affecting its operations. We will seek to serve and support the community in which we operate 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

AKC 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

AKC provides healthy and safe working conditions for all of 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
- Make all employees aware of risk assessments and raise awareness of their own responsibilities for the health and safety of themselves and others

Human Rights

AKC is committed to the prevention of any violation of established Human Rights of any kind, particularly where child labour or undesirable forced acts are involved.

Social Responsibility

AKC 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.



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Ethical Policy

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

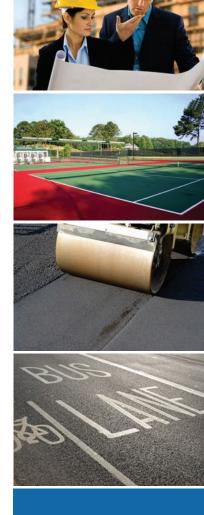
AKC regards information for the purpose of its business as a corporate asset which must be protected against loss of availability, infringement and improper disclosure. We seek to ensure as far as reasonably practicable, that this information is protected. This applies also to intellectual property including 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.

- AKC believes that implementation of the ethics policy:
- promotes a culture of ethical behaviour throughout the organisation
- sets clear standards for employees
- makes good business sense
- protects the integrity and enhances our reputation

This policy will be reviewed and updated annually.



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Quality Assurance Policy

AKC storage facilities are well kept, storing materials in small quantities with adequate drainage ensuring we protect the water course from run off contamination.

AKC operates a Quality Assurance process. The purpose of this process is to monitor the service it provides to you, establish your opinions and thoughts on the services provided, and to use all gathered information in a positive way to continually improve the delivery of its service to you. The processes used include monitoring forms, questionnaires, compliments, complaints and comments.

AKC also uses feedback from other professional organizations in this procedure. It keeps in close contact with the client and documents any positive or negative comments in a communications book for evaluation.

AKC is committed to providing its Service Users and Temporary Workers with a quality service. In order to monitor, assess and re-evaluate the service it provides it has developed a programmed which allows audit to take place in a variety of ways. AKC relies heavily upon good communications and feedback from its service users and workers in order to complete the audits necessary to evaluate its service.

- AKC supplies its service users with a questionnaire for completion on an annual basis, AKC supplies the service users SAE for return of these questionnaires.
- AKC requests the co-operation of its service users in the completion of monitoring forms that give an accurate insight into the staff and service it provides.
- AKC supplies its workers with documentation for completion on a weekly basis. This documentation allows AKC to monitor places of work and identify any actual or potential problems.

AKC is constantly examining new avenues to in order to achieve a comprehensive audit of workers and services. Its aim is to maintain a quality service to its workers and service users. It uses information gained through these avenues to reassess and improve the whole service it provides.

- The Aims and Objectives of AKC
- AKC is committed to its philosophy "To promote high standards in professional, educational and employment practices".
- All working policies, procedures and guidelines that AKC employ are in accordance with the National Minimum Standards.
- AKC make available full H&S training and best practice guidance.
- AKC is committed to providing a professional, guality service to its service users for which they will be fairly charged.
- AKC pays its workers a fair remuneration for the assignments they undertake.
- AKC is committed to treating any complaint in a swift, professional manner, adhering to its own Complaint, Grievance and Disciplinary policies, procedures and guidelines.
- AKC is a responsible contractor that believes in providing its service users with a high quality, reliable, professional service. This quality is measured and monitored by a variety of evaluation systems, i.e. service questionnaire, monitoring forms etc..
- · AKC aims to offer its workers appropriate assignments that will reflect their individual knowledge, experience and ability.





Bucks **SL1 8QE**



Waste Management Policy

AKC is committed to reducing its impact on the environment by managing its waste in an efficient and sustainable manner.

Waste can be classified generally as anything that someone no longer has a use for or does not want anymore. In the UK 83% of municipal waste and 54% of commercial and industrial waste is sent to landfill. Only 12% of municipal waste is recycled or composted and 35% of commercial or industrial.

The cost of waste disposal is on the increase annually. Putting waste into landfill is not sustainable, as a society we need to learn to do more with less. It is important to make better use of resources putting materials to better use and educing our impact on the environment.

Some steps that could help to reduce the waste we produce.

Reduce Avoid the need to discard materials in general. Consider asking suppliers to take back any packaging or reusable items.

Re-use Just because you no longer need an item it does mean another person can't make use of it. Consider passing on equipment/materials before discarding them. Recycle Segregation of materials for recycling is essential for the reduction of waste. We are currently looking into using a waste carrier who grades all waste at their premises.

Disposal Any disposal of waste must comply with the Environmental Protection Act 1990 Duty of Care.

Under the EPA 1990 we must make sure we

• That as a registered carrier all licenses are kept up to date

• That all transfer notes for skip/grab loader loads are filed and kept for 3 years. Breach of the duty of care is a criminal offence and can incur penalties of up to £20,000 or an unlimited fine if convicted on indictment.



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Sustainability Policy

Eco Management & Audit Scheme.

As a small contractor AKC strive to comply with the ethos of EMAS where applicable to our industry.

AKC Commit to continuous improvement in environmental performance to reduce costs and benefit the environment at large, using renewable and sustainable products and power sources whenever practical.



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