

5.2.3 Quality Policy Statement

It is the policy of **Harlequin Manufacturing Limited** to satisfy all applicable requirements, to provide a range of products and services which always meet our customer's requirements and always conform to quality standard parameters, and to ensure that programmes are maintained on schedule at the agreed price.

All work is carried out in a cost effective and timely manner, and in accordance with the highest professional standards, whereby we are committed to continual improvement and customer satisfaction through the involvement and participation of all levels of management, staff, workers and other interested parties.

A policy for quality conforming to the requirements of **ISO 9001:2015** has been established to ensure that it:

- Is appropriate to the context of the organisation, the expected level of customer satisfaction, and the needs of other interested parties
- Includes a commitment to meeting all requirements and to continual improvement
- Provides the internal resources needed, along with contributions from suppliers and other partners
- Provides a framework for establishing and reviewing quality objectives
- Demonstrates top management commitment and ensures the quality objectives are communicated, understood and implemented at appropriate levels within the organisation
- Is regularly reviewed at the management review meeting for suitability and effectiveness addressing continual improvement and customer satisfaction.

Some personnel have been allocated more than one role to carry out within the organisation. It is however organisational policy that dual or multiple roles shall not deter, in any manner, any member of staff from achieving their primary objective of providing a quality service through an adequately controlled quality (i.e. integrated) management system.

Management is ultimately responsible for making balanced judgements, assessing the significance of variations in quality, and then taking decisions. In arriving at such decisions, the quality and personal integrity of staff are of fundamental importance. In this context, all effort is made to ensure that each person in the organisation understands that quality assurance is vitally important to their future, knows how they can assist in the achievement of adequate quality, and is stimulated and encouraged to do so.

This policy is approved by the undersigned and is supported by all the levels of management within the organisation. All personnel shall be guided by the contents of the quality management system and no deviation from the methods and procedures set down shall be permitted.

We at **Harlequin Manufacturing Limited** will review this policy annually at Management Review Meetings.

Signed


Managing Director

Date: 18 Feb 2022



5.2.4 Environmental Policy Statement

We at **Harlequin Manufacturing Limited** recognize that environmental impacts are created as a result of our activities, and that we have a responsibility to all of our interested parties and stakeholders to manage these impacts appropriately.

We are committed to the protection of the environment, including prevention of pollution, fulfilling compliance obligations, and continual improvement.

We will therefore:

- Operate an Environmental Management System (EMS) implemented in line with **ISO 14001: 2015**
- Comply with all applicable legislation, regulations and industry codes of practice
- Communicate our Environmental Policy, both internally, by posting this document throughout the organisation and externally to all interested parties including those working on behalf of the organisation
- Endeavour to prevent pollution, reduce raw material & operational wastage, and improve energy efficiency
- Set and achieve environmental objectives and targets for the organisation, which will be communicated throughout our organisation
- Maintain efforts to achieve continual improvement in the environmental performance of the organisation, with periodic evaluation and review of same
- Foster openness, dialogue and discussion with employees, customers, suppliers, contractors and all interested parties regarding environmental performance, which may include mutually beneficial environmental objectives and actions
- Measure environmental performance by conducting regular environmental audits and assessments of compliance with this Environmental Policy, with relevant environmental legislation, and any other related requirements of the business.

We at **Harlequin Manufacturing Limited** will review this policy annually at Management Review Meetings.

Signed



Managing Director

Date: 18 Feb 2022



5.2.5 Health, Safety, Welfare & Wellbeing Policy Statement

We at **Harlequin Manufacturing Limited** recognize that there is a duty of care on all of us to comply with all of our legal duties with respect to the provision of safe and healthy working conditions for all employees. We will take *positive* action to ensure that our work does not adversely affect others, such as contractors, occupiers of buildings, the public, or any other relevant third party.

Our organisation will therefore:

- Co-operate with all those who have an interest in Health, Safety, Welfare & Wellbeing, such as other employers, customers, suppliers, sub-contractors and the enforcing authorities
- Provide adequate financial support for the full implementation of this policy
- Ensure that all persons are competent to carry out the duties asked of them
- Provide all of the necessary Health, Safety, Welfare & Wellbeing information, instruction, supervision and training as may be appropriate
- Ensure that all employees are consulted on matters of Health, Safety, Welfare & Wellbeing
- Encourage positive employee engagement, consultation and participation at all times, in relation to the communication of all Health, Safety, Welfare & Wellbeing matters.

As an organisation, we consider the Health, Safety, Welfare & Wellbeing of our employees to be of prime importance, essential to the operation of our business, and a management responsibility of equal importance to any and all others.

We are committed to a *proactive* approach to accident prevention, in order to achieve continuous improvement in our Health, Safety, Welfare & Wellbeing performance. Therefore, consequently, we have set an ultimate goal for the organisation of “Zero Accidents”, so in light of this we shall operate an occupational health and safety management system in accordance with the requirements of **ISO 45001: 2018**.

This policy will be kept up to date and will be amended to suit any changes in the size or nature of our organisational activities.

We have appointed the Quality / HSE Manager to co-ordinate our efforts on all Health, Safety, Welfare & Wellbeing matters. The organisation will, where required, obtain advice on any relevant Health, Safety, Welfare and Wellbeing matters from appropriate external sources.

We at **Harlequin Manufacturing Limited** will review this policy annually at Management Review Meetings.

Signed



Managing Director

Date: 18 Feb 2022



5.2.6 Supply Chain & Sub-Contractor Policy Statement

Suppliers and Sub-contractors will be engaged by **Harlequin Manufacturing Limited** from time to time to perform specific tasks and carry out specific work that is deemed to be outside the scope of the organisation's skill set or normal operational activities.

It is the expectation of **Harlequin Manufacturing Limited** that all sub-contractors always acquire and follow safe working practices, and that they and develop a genuine concern for the health, safety, wellbeing and welfare of all fellow workers on any given contract.

To meet these expectations, sub-contractors shall be required to adhere to this policy and show total commitment to our proactive approach to accident prevention.

Furthermore, we expect all suppliers and sub-contractors to:

- Operate with the same level of ethical standards and integrity as we do ourselves – a safe, sustainable supply chain is our objective.
- Give an undertaking to comply with all health, safety and environmental standards and procedures set down by **Harlequin Manufacturing Limited**, including provision of adequate risk assessments and method statements for any work undertaken, when requested by Harlequin.
- Ensure that all their employees are trained and assessed competent to carry out the tasks required.
- Ensure that they have provided adequate employers' and public liability cover and will provide their employees with the appropriate personal protective equipment required.
- Ensure that their employees have received training in the correct care and usage of all such equipment.

All sub-contractors and suppliers on site must ensure that all tasks are carried out under the direction and control of competent supervision, and that all equipment, tools and vehicles are fit for purpose and comply with statutory and any other site requirements.

Suppliers / sub-contractors will report any HSE incident immediately to a member of the management team at **Harlequin Manufacturing Limited**, so that an appropriate and timely response can be initiated by the Quality/HSE Manager.

We at **Harlequin Manufacturing Limited** will review this policy annually at Management Review Meetings.

Signed



Managing Director

Date: 18 Feb 2022



5.2.7 Employee Privacy / Data Protection Policy Statement

Why do we hold data? As your employer, **Harlequin Manufacturing Limited** needs to keep and process information about you for normal employment purposes. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, whilst you are working for us, at the time when your employment ends and after you have left. If you do not provide this data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision.

What data do we hold? Application form; References; Your contract of employment; Equality of Opportunity form; Letters to you about a pay rise or, at your request, a letter to your mortgage company confirming your salary; Information needed for payroll, benefits and expenses purposes; Contact and emergency contact details; Records of holidays, sickness and other absence; Information needed for our equal opportunities monitoring policy / purposes; Records relating to your career history, such as training records, appraisals, other performance measures and, where appropriate, disciplinary and grievance records.

How you can access this information and how is it protected? Your data will be held in the locked personnel cabinet and be accessed upon request.

Will my information be given to anyone else? We will only disclose information about you to third parties if we are legally obliged to do so or where we need to comply with our contractual duties to you, for instance we may need to pass on certain information to our external payroll provider, pension or health insurance schemes.

How long is my data stored for? Your personal data will be sorted for the duration of your employment and will be stored for a period of 5 years after the termination of your employment.

Consent and Rights: Under the General Data Protection Regulations (GDPR) and The Data Protection Act 2018 (DPA) you have a number of rights with regard to your personal data. You have the right to request from us access to and rectification or erasure of your personal data, the right to restrict processing, object to processing as well as in certain circumstances the right to data portability. If you have provided consent for the processing of your data you do have the right (in certain circumstances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent is withdrawn.

You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of the GDPR or DPA 18 with regard to your personal data.

Contact: If you have any queries regarding your data please do not hesitate to write an email addressed to privacy@harlequin-mfg.com.

We at **Harlequin Manufacturing Limited** will review this policy annually at Management Review Meetings.

Signed


Managing Director

Date: 18 Feb 2022

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5.2.8 Ethical Trading Policy Statement

Harlequin Manufacturing Limited are committed to sustainable growth, whilst acting in a socially and ethically responsible way.

This policy is derived from the Ethical Trading Initiative (ETI) Base Code, which stems from international labour and human rights law.

We also adopt a policy of continual review, monitoring and improvement within all aspects of the business, and we look to best practice and current legislation as the benchmark for these improvements.

We believe it is our moral responsibility to our employees, customers, supply partners and the community at large to act in an ethically responsible manner.

Best practice in this area, we believe, makes good business sense, provides a competitive advantage to the business, and maximises company benefit.

Harlequin Manufacturing Limited is committed to **ethical trading principles** and compliant with the Modern Slavery Act 2015. Harlequin also expects our suppliers to conform to the same basic principles as ourselves, which are outlined below and include:

1. Employment is freely chosen

1.1 There is no forced, bonded or involuntary prison labour.

1.2 Workers are not required to lodge "deposits" or their identity papers with us as their employer and are free to leave us as an employer after reasonable notice.

2. Freedom of association and the right to collective bargaining are respected

2.1 Workers, without distinction, shall have the right to join or form trade unions of their own choosing and to bargain collectively.

2.2 We as an employer adopt an open attitude towards the activities of trade unions and their organisational activities.

2.3 Workers representatives are not discriminated against and shall have access to carry out their representative functions in the workplace.

2.4 Where the right to freedom of association and collective bargaining is restricted under law, we as the employer facilitate, and do not hinder, the development of parallel means for independent and free association and bargaining.

3. Working conditions are safe and hygienic

3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards.

Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of all hazards inherent in the working environment.

3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

3.4 Accommodation, if / where provided, shall be clean, safe, and meet the basic needs of our workers.

3.5 As a company observing the base code we shall assign responsibility for health and safety to a senior management representative.

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4. Child labour shall not be used

4.1 There shall be no new recruitment of child labour.

4.2 If ever required, as a business we shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; “child” and “child labour” being defined in the appendix below.

4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.

4.4 These policies and procedures shall conform to the provisions of the relevant International Labour Organisation (ILO) standards.

5. Living wages are paid

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

5.2 All workers shall be provided with written and understandable Information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures shall be recorded.

6. Working hours are not excessive

6.1 Working hours comply with national laws and benchmark industry standards, whichever affords greater protection.

6.2 In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7-day period on average. Overtime shall be voluntary, shall not normally exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

7. No discrimination is practised

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

8. Regular employment is provided

8.1 To every extent possible work performed shall be on the basis of recognised employment relationship established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, subcontracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

9. No harsh or inhumane treatment is allowed

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

10. Environmental Impact is managed

10.1 Suppliers should measure and where appropriate, seek to reduce the environmental impacts of their business activities. In addition to complying with local laws, steps should be taken to optimise the use of energy and natural resources and reduce the generation of waste.

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Definitions:

Child - Any person less than 15 years of age unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age shall apply.

Young person - Any worker over the age of a child as defined above and under the age of 18.

Child Labour - Any work by a child or young person younger than the age(s) specified in the above definitions which does not comply with the provisions of the relevant ILO standards, and any work that is likely to be hazardous or to interfere with the child's or young person's education, or to be harmful to the child's or young person's health or physical, mental, spiritual, moral or social development.

NB: The provisions of this code constitute **minimum** and not maximum standards, and this code should not be used to prevent companies from exceeding these standards.

Companies applying this code are expected to comply with national and other applicable law and, where the provisions of law and this ETI Base Code address the same subject, to apply that provision which affords the greater protection.

We at **Harlequin Manufacturing Limited** will review this policy annually at Management Review Meetings.

Reviewed & Approved by Harlequin Manufacturing Limited Board of Directors

Signed



Managing Director

Date: 18 Feb 2022