



Olive Air

**SafeContractor**

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# 1. Anti-Bribery Policy

## INTRODUCTION

The company has implemented this policy to ensure the highest standards of honesty and integrity in its business. The company has assessed the risk to the business of acts of bribery and corruption and expects all employees and associated persons acting on behalf of the company to comply with this policy and to ensure that no offence under the Bribery Act 2010 is committed for which the company would be liable. Failure to comply with this policy may constitute a serious act of misconduct which could result in the dismissal of an employee / worker or the cancellation of a contract with an associated person.

### 1. Bribery

Bribery may be known as a bung, kickback, favour for cash or another term. It is generally defined as the giving or receiving of a financial inducement or other advantage in return for the improper performance of a relevant function or activity.

Examples of bribery include giving or receiving a financial inducement or other advantage in order to:

- secure or keep a contract
- secure an order
- gain any advantage over a competitor
- turn a blind eye to a health safety issue or poor performance or substitution of materials or false labour charges
- falsify an inspection report or obtain a certificate

Bribes can be given to, or received from representatives of suppliers, contractors, public officials and clients amongst others.

Bribes do not have to involve a cash payment and can include the giving or receiving of gifts, hospitality, entertainment or other benefit.

### 2. The Bribery Act 2010

The Bribery Act makes it a criminal offence for an individual to offer or accept a bribe and is punishable by a fine and / or up to 10 years imprisonment.

The Act also states that an offence will be committed by a commercial organisation if they fail to prevent a person associated with the organisation from offering or accepting a bribe which would obtain or retain business for the organisation or cause the organisation to gain an advantage in the conduct of its business.

An associated person could include a director, shareholder, employee, agency worker, sub-contractor, supplier or other third party acting in association with the organisation such as a partner in a joint venture. Where an organisation is found guilty of this offence this can be punished by an unlimited fine and / or the loss of the right to tender for government contracts.

The conviction of the organisation, and / or any person acting in association with the organisation, could also cause severe damage to the reputation of the organisation.

In order to ensure compliance with the Act and general principles of honesty, integrity and commercial fairness the company has adopted the policy in order to prevent the commission of acts of bribery in its name.

### 3. Prohibited Conduct

The following conduct is prohibited by this policy:

- making unofficial payments to officials in order to obtain any permission, permit or stamp;
- making payments or giving incentives in order to obtain or retain business

- accepting payments or receiving incentives in return for accepting a tender for business
- making or receiving a facilitation payment to expedite the performance of a routine procedure or function

The above conduct is prohibited, regardless of the location where it occurs, anywhere in the world. No director, shareholder, employee, agent or other third party acting on behalf of the company shall be involved in such conduct.

#### 4. Permitted conduct

This policy is not intended to prohibit the following practices provided they are appropriate, proportionate and are properly recorded:

- normal hospitality (this should normally be to thank an existing client or supplier for loyalty and should not normally occur during a tendering process or contract negotiations); or
- fast tracking a process which is available to all on the payment of a fee; or
- providing resources to assist a person or body to make a decision more efficiently, provided that it is for this purpose only.

#### 5. Due diligence – suppliers and partners

Where a person acting on behalf of the business is considering entering into an agreement with a new supplier, agent or partner then they should consider whether or not that person or organisation is likely to be involved in corrupt or unlawful practices that may be in contravention of the Bribery Act 2010.

Factors that should be considered include:

- the nature of the business carried out by the supplier, agent or partner
- the location(s) where the supplier, agent or partner is based and carries on its business
- whether or not the supplier, agent or partner will be making payments (including taxes or fees) on behalf of the company
- whether or not the supplier, agent or partner will be applying for permits, licences or official stamps from public officials or authorities on behalf of the business
- whether or not the supplier, agent or partner will be involved in tender processes or contract negotiations on behalf of the business.

Where it is considered that there is a risk of bribery arising from entering into an agreement with a new supplier then due diligence on the supplier, agent or partner must be carried out. This may involve obtaining information on any anti bribery policies the supplier, agent or partner has in place, obtaining third party references for the supplier, agent or partner and obtaining criminal record checks for relevant individuals.

Whenever the company enters into an agreement with a new supplier, agent or partner then they must be made aware of the company anti bribery policy and confirm their intent to comply with it at all times.

Where it is considered that there is a significant risk of bribery then the matter must be referred to a director or senior management for advice and direction before any agreement is entered into.

#### 6. Reporting procedures

Any person associated with the business who suspects that any person or organisation engaged in business, or associated, with the company is involved in bribery should report this through the Company Whistle Blowing policy. A copy of the Company Whistle Blowing policy is available on request.

All reports will be taken seriously and dealt with promptly and where possible in confidence. Any person reporting suspected bribery should be able to do so without fear of reprisal and no disciplinary or otherwise detrimental action will be taken against a person for reporting a suspected act of bribery, unless there is evidence that they did so in bad faith.

## 2. Equal Opportunities Policy

### INTRODUCTION

This is a policy statement setting out the company position on equality in the workplace. This document is not contractual but describes the way the company is committed to equality and equal opportunities, and how it will implement that commitment.

The company is committed to the principles of equality in employment and to fostering a work place where all employees are able to prosper and advance based on the suitability and quality of their work alone.

This policy is based on the principle that all employees should be treated with dignity and respect. There should be no unfair discrimination of employees, workers or associates of the company on the basis of gender, race, ethnicity, nationality, health, age, sexual orientation, marital status, religious belief or philosophical belief.

The company seeks to ensure that this policy is implemented in practice in all and every aspect of the business and its activities. The policy is supported by all senior management and all employees are encouraged to read it and abide by it. The company will take all reasonable steps to ensure that all decisions relating to recruitment, training, promotion, opportunities, provision of benefits and selection are made on the basis of objective and job related criteria alone.

The company will take all reasonable steps to ensure that any stakeholders and contractors comply with this policy.

All employees, workers and associates of the company are asked to read this policy and are expected to comply with the provisions at all times.

### LEGISLATION

There are a number of pieces of legislation making provision for equal opportunities and the company will always comply with the relevant law as required. However, the company is committed to exceeding the minimum expected standards for equal opportunities wherever possible.

The company will review and update this policy in line with any changes to the relevant legislation.

### DISCRIMINATION

The company is opposed to all unfair and unjustified discrimination. Discrimination is defined by the Equalities Act 2010 and can take the form of direct or indirect discrimination, harassment and victimisation. It is unlawful to discriminate against a person on the grounds of the following 'protected characteristics'

- Gender
- Race, ethnicity and nationality
- Disability
- Age
- Sexual orientation
- Marital status
- Religious or philosophical belief
- Gender Reassignment
- Pregnancy and Maternity

### RESPONSIBILITIES

#### Directors / Partners

The directors / partners of the company have collective responsibility for the content, implementation and review of this policy. They are also responsible for leading by example in matters of equality and diversity and encouraging good practice across the organisation.

#### HR leader

The director or manager with day-to-day responsibility for HR matters is required to ensure this policy is distributed to all employees and operatives. They shall also ensure managers have received equal opportunities training and that the provisions of the policy are implemented on a day to day basis.

### **Contract managers, site managers and supervisors**

All employees who have line management responsibilities shall ensure that those employees and operatives under their control comply with the requirements of this policy. They shall ensure that any breaches of the policy are investigated, recorded and, where necessary, formal disciplinary action taken. Where in doubt, the matter should be referred to the HR leader or a director.

### **Employees and operatives**

All employees, agency workers and contract labourers are required to comply in all respects with the provisions of this policy. Where an employee is subject to or witnesses a breach of this policy they should report the matter without delay to his/her line manager, or where not appropriate, the HR leader or a director.

## **1. IMPLEMENTATION OF OUR COMMITMENT TO EQUAL OPPORTUNITIES**

This policy applies to:

1. Recruitment and Selection
2. Training and Development
3. Appraisal, Promotion and Transfers
4. Terms of Employment, Benefits and Facilities
5. Grievance and Disciplinary Procedures
6. Dismissals, Restructuring and Redundancies

### **Recruitment and Selection**

All vacancies will be advertised internally and will be made accessible to all employees, including those on maternity, paternity or adoption leave. However, in circumstances of restructuring or redundancy it may be necessary to ring fence available vacancies for those employees whose positions are at risk.

All recruitment decisions will be based on fair and objective criteria. The company will not make assumptions that only certain types of person will be able to perform certain types of work. Any decision will be made on the basis of an individual's suitability to perform the role.

All selection tests will be job specific and should be devised to test an individual's suitability to perform that particular role.

The company will take all reasonable steps to remove barriers to the recruitment process or employment, where these may disadvantage applicants who have a certain protected characteristic. This may include making recruitment materials available in alternative formats, making adjustments to recruitment assessments and making sure that vacancies are advertised in the local community in a manner that is visible to all demographic groups.

Where an applicant has a disability and believes that they will be disadvantaged by the company recruitment process they should make the company aware of this as soon as possible in order that the company can make reasonable adjustments to the process with the objective of removing that disadvantage.

The company will seek to ensure that those persons who make decisions on recruitment have read and understood this policy and where possible received relevant training on the principles of equal opportunities.

### **Training and Development**

The company will reflect its commitment to equal opportunities through equality of access to training and career development opportunities.

The availability of training and development opportunities will be determined by business needs, an employee's ability and the availability of suitable training courses.

All internal training and development programs will be designed to comply with the provisions of this policy and to ensure that they do not discriminate against or prejudice employees who have a particular protected characteristic.

### **Appraisal, Promotion and Transfers**

All appraisal processes and criteria will be devised to ensure that they are compliant and consistent with the provisions of this policy.

An employee's appraisal results should be based on individual merit, performance and ability. Appraisal results will be reviewed where there is evidence that opportunities for training, promotion and transfer are being offered disproportionately to one group of employees.

Opportunities for promotion or transfer will be offered to employees on the basis of the individual's ability and suitability for the new role only.

The company will seek to eliminate or reduce the impact of any provision, criterion or practice relating to appraisal, promotion or transfer, which indirectly puts employees of a particular protected characteristic at a disadvantage.

### **Terms of Employment, Benefits and Facilities**

The company will ensure that the terms of employment, benefits and access to facilities available to employees are provided in a way which is not unlawfully discriminatory.

In particular, part time and / or fixed term employees will receive the same terms (pro-rata where appropriate) of employment, benefits and access to facilities as full time and / or permanent employees.

Any discrepancy in rates of pay, benefits, bonus or commission will be dependant on an employee's ability and merit only.

The company is legally obliged to make reasonable adjustments for employees who have a disability and to consider requests for flexible working conditions from certain employees and therefore it may be necessary, in order to comply with those obligations, to offer terms of employment or facilities to those employees which are preferential. To do so will not be in breach of the company's commitment to equal opportunities, but rather is a manifestation of that commitment.

Pay and bonus criteria will be developed and reviewed to ensure that they do not disadvantage employees who have a particular protected characteristic.

### **Grievance and Disciplinary Procedures**

An employee will not be disciplined, dismissed or otherwise subjected to less favourable treatment for raising, in good faith, a grievance complaining of a breach of this policy, or otherwise making a complaint in relation to equal opportunities and discrimination. Likewise, if an employee assists another person, in good faith, in relation to such a grievance they will not be subjected to disciplinary procedures.

Employees are also directed to the company Whistle Blowing Policy where they believe in good faith that a member or associate of the company is acting in a manner which is unlawfully discriminatory.

No employee having a particular protected characteristic will be disciplined or dismissed for conduct or performance for which a person who did not have that particular protected characteristic would not be disciplined or dismissed, unless there is a genuine and lawful justification for different treatment.

### **Dismissals, Restructuring and Redundancies**

Redundancy and restructuring processes will be developed to ensure that they are not in themselves unlawfully discriminatory.

The company will take all reasonably practicable steps to ensure that those employees responsible for

administering restructuring and redundancy processes do not apply the relevant criteria in a way which it is unlawfully discriminatory.

The company will review its redundancy and restructuring procedures and criteria where there is evidence that it is prejudicing employees who have a particular protected characteristic.

### **DISABILITY POLICY**

The company will, wherever possible, seek to make adjustments to accommodate issues relating to any employee's health, regardless of whether or not they have a disability.

The company is committed to making available to employees who have a disability the same opportunities for recruitment, training, development and promotion. The company is aware of, and committed to, complying with its duty to make reasonable adjustments where a physical feature of the workplace, a provision, or circumstances puts a disabled employee at a substantial disadvantage. The company will provide auxiliary aids to a disabled employee where necessary and reasonable, and will make any further adjustments which are reasonable and which would reduce or negate the substantial disadvantage suffered.

The company will take into account the impact of any disability on an employee's conduct, performance and attendance when assessing those matters.

The company will seek to consult with an employee in relation to any matter upon which his / her disability will have an impact and employees are encouraged to bring to the attention of their designated manager or other appropriate manager any concerns or issues arising in the work place as a result of the disability.

### **FAMILY FRIENDLY POLICY**

The company is committed to providing terms and conditions of employment that are compatible with an employee's family commitments.

The company therefore encourages employees who have children or the responsibility for the upbringing of a child to use the company flexible working policy which supports their statutory right to flexible working.

Employees are also directed to the company policies which cover leave and pay in circumstances of maternity, paternity and adoption.

### **SUBCONTRACTOR ORGANISATIONS**

It is a requirement of the company that all subcontractor organisations, who employ one or more members of staff, have in place a suitable equal opportunities policy and that they agree to comply with the company's commitment to equality and diversity.



### 3. Modern Slavery and Human Trafficking Policy

#### 1. Policy statement

- a. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- b. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- c. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- d. This policy does not form part of any employee's contract of employment and we may amend it at any time.

#### 2. Responsibility for the policy

- a. ENTER JOB TITLE has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- b. ENTER JOB TITLE has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- c. Line managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
- d. You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the person responsible for this policy.

#### 3. Compliance with the policy

- a. You must ensure that you read, understand and comply with this policy.
- b. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- c. You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- d. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- e. If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.
- f. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or Head of Procurement.
- g. 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 reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. 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 the Head of Procurement immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

#### 4. Communication and awareness of this policy

- a. Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.
- b. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

#### 5. Breaches of this policy

- a. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- b. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.