

Anti-Tax Evasion Policy Statement

In accordance with the Criminal Finances Act 2017, Geotechnics Limited conducts all of our business dealings in an honest and ethical manner. This policy covers all our business dealings and the conduct of all persons or organisations who are appointed to act on our behalf.

The Company has a **zero tolerance** approach to all forms of tax evasion, whether under UK law or under the law of any foreign country.

Employees or subcontractors must not:

- a) Undertake any transactions which:
 - cause the Company to commit a tax evasion offence; or
 - facilitate a tax evasion offence by any third party
- b) Engage in any form of facilitating **Tax Evasion** or **Foreign Tax Evasion**
- c) Aid, abet, counsel or procure the commission of a **Tax Evasion** offence or **Foreign Tax Evasion** offence by another person
- d) Fail to report promptly any request or demand from any third party to facilitate the fraudulent **Evasion of Tax** by another person, in accordance with this policy
- e) Engage in any other activity that might lead to a breach of this policy
- f) Threaten or retaliate against another individual who has refused to commit a **Tax Evasion** offence or a **Foreign Tax Evasion** offence or who has raised concerns under this policy
- g) Commit any offence under the law of any part of the UK consisting of being knowingly concerned in, or taking steps with a view to, the fraudulent evasion of tax

If there is any suspicion of any intention that an employee or third party is attempting to, or committing **Tax Evasion** or **Foreign Tax Evasion**, the details of the parties and the transaction must be reported to the Company's finance department who will report the circumstances to HMRC.

**The Company has a
zero tolerance
approach to all forms
of tax evasion**



John Booth

Managing Director

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Changes since last issue:

- No changes



WHAT IS THE FACILITATION OF TAX EVASION?

For the purposes of this policy:

Tax Evasion means an offence of cheating the public revenue or fraudulently evading UK tax, and is a criminal offence. The offence requires an element of fraud, which means there must be deliberate action, or omission with dishonest intent.

Tax Evasion Facilitation means being knowingly concerned in, or taking steps with a view to, the fraudulent **evasion** of **tax** (whether UK **tax** or **tax in a foreign country** by another person, or aiding, abetting, counselling or procuring the commission of that offence. Tax evasion facilitation is a criminal offence, where it is done deliberately and dishonestly.

Tax evasion is not the same as tax avoidance or tax planning. Tax evasion involves deliberate and dishonest conduct. Tax avoidance is not illegal and involves taking steps, within the law, to minimise tax payable (or maximise tax reliefs).

Tax means all forms of UK taxation, including but not limited to corporation tax, income tax, value added tax, stamp duty, stamp duty land tax, national insurance contributions (and their equivalents in any non-UK jurisdiction) and includes duty and any other form of taxation (however described).

PREVENTION THROUGH VIGILANCE

There is not an exhaustive list of **Tax Evasion** opportunities. At a more general level, the best defence against **Tax Evasion** and facilitation of **Tax Evasion** remains the vigilance of employees and the adoption of a common sense approach.

HOW TO RAISE A CONCERN

If there is any suspicion of any intention that an employee or third party is attempting to, or committing **Tax Evasion** or **Foreign Tax Evasion**, the details of the parties and the transaction must be reported to the Company's finance department who will report the circumstances to HMRC.

Any queries or suspicions should be directed to the following:

Dawn Wadsworth
Finance Director/Company Secretary
Geotechnics Limited
The Geotechnical Centre
203 Torrington Avenue
Tile Hill
Coventry
CV4 9AP
Tel: 02476 694664
Direct Dial: 02476 629022
Email: dwadsworth@geotechnics.co.uk

Concerns can also be reported anonymously via the Company's 'TAG IT' reporting system. Post-boxes are available in all Company offices, some site offices or via our online form here: <http://geotechnics.rocks/tagit>



Corporate Social Responsibility (CSR) & Sustainability Policy Statement

Geotechnics Limited recognises its role within the construction industry in providing the basis for safe, economic and sustainable design and hence contributing to a sustainable future. In order to do so effectively we have defined what sustainability means to and within our Company and, specifically, how our industry positioning, day-to-day operations and range of services feed into and impact the three recognised branches of sustainability - Social, Environmental and Economic:

- **Our Social Impact** – continual professional development of our staff, caring for their wellbeing and creating a safe, secure and healthy work environment for them, our clients and the community at large.
- **Our Environmental Impact** – effective management of our sites and offices to minimise physical damage to the ecosystem, reduce waste, improve energy efficiency and prevent pollution.
- **Our Economic Impact** – sustainable and responsible organic growth within our business; strong governance and accountability; support of regional economies by using suppliers local to our sites and offices where feasible, creating new jobs if possible; increasing and promulgating ideas, technical knowledge, understanding and development within our industry.

We pursue our commitment by:

- Continuing to operate and maintain an **Environmental Management System** to meet the requirements of ISO 14001:2015, in accordance with our **Environmental Policy Statement**,
- Seeking to minimise any adverse impact on the environment; maximise the potential for the reuse and recycling of materials and actively promote methods aimed at minimising waste,
- Developing our staff and raising awareness of sustainability issues through our employees and supply chain to ensure that our workforce is able to meet the current and future needs of the business,
- Improving and protecting the health and safety of our workforce and the communities affected by our operations and to focus on continued health and safety improvement within our business,
- Continuing to engage with local and national communities and stakeholders and doing so at the earliest possible opportunity to ensure that any adverse impacts are identified and managed effectively,
- Assessing the feasibility of utilising and delivering products and services which have a low environmental impact across their lifecycle on a companywide and project-by-project basis,
- Collaboratively working and actively seeking to promote sustainability and innovative solutions with our suppliers, peers, clients and their advisors through our technical output and membership of various organisations, groups and working parties which are directly connected to our industry.

We recognise our role within the construction industry in providing the basis for safe, economic and sustainable design and hence contributing to a sustainable future



John Booth

Managing Director

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Changes since last issue:

- None





DRUGS & ALCOHOL POLICY

February 2021



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KEY INFORMATION:
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1.0 Policy Statement

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Geotechnics Limited was established in 1983 to provide the full spectrum of services covering the design, implementation, interpretation and evaluation of geotechnical and contaminated land site investigations. It is now one of the largest independent specialists in the United Kingdom. The head office and laboratory are based in Coventry, with additional offices in Exeter, Chester and Yorkshire.

[3](#) [4](#)

This Policy and supporting procedures applies to all people working on Geotechnics Limited (from herein known as the Company), premises or controlled sites, including temporary staff and external contract personnel. It should be read in conjunction with the other Company Policy Documents.

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The philosophy of this Policy applies equally to Construction related projects and work to be undertaken on any Network Rail Infrastructure in that where an accident occurs, and alcohol or drug use is considered to be a potentially contributory factor, then the Company shall implement 'for cause' testing.

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The Company's duty is to exercise due diligence and maintain a safe, healthy and productive working environment for all who are involved in its operations.

In recognition of the continued and growing problem of substance dependency and abuse in society, and its subsequent associated increase in the potential for ill health, accidents, absence and poor performance; the Company will act to try to prevent any such abuse.

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It is the Management's responsibility, including its Supervisors, to maintain discipline and a safe working environment, respond to poor work performance, misconduct or unsatisfactory levels of absence, and to enforce this Policy.

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The Company requires all employees and personnel working on its behalf, to arrive at work free from the effects of alcohol or drugs.

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The consumption of alcohol or the taking of drugs during working hours or on Company premises, in control of Company property, or on controlled sites is strictly prohibited.

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No employee or person working on behalf of the Company should be in possession of illegal drugs whilst on Company premises or controlled sites whether they are at work or not. The Company recognises the controlled use and possession of medicines for personal use as an exception. However; it is the responsibility of the employee/individual, and a requirement of this Policy and associated Procedures, to inform their Supervisor of their use of any prescribed or over-the-counter medication that may affect their work performance, or have adverse effects to the results of 'for cause' testing.

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Use of illegal drugs will not be condoned. An employee with a drug or alcohol misuse problem will be encouraged to seek help, advice and treatment.

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Specific duties, employee assistance, and alcohol and drugs disciplinary procedures are detailed in the Company's Alcohol and Drugs Procedures appended to this Policy.

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This policy applies to all those employed directly or sub-contracted to Geotechnics Limited.

In recognition of the continued and growing problem of substance dependency and abuse in society, and its subsequent associated increase in the potential for ill health, accidents, absence and poor performance; the Company will act to try to prevent any such abuse.

John Booth

Managing Director

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Changes since last issue:

- None



2.0 Purpose and scope of this policy

This Policy and supporting procedures applies to all personnel working for or on behalf of Geotechnics Limited (the Company), and provides mandatory requirements and recommended guidance.

Additionally, all personnel that are sponsored by the Company to work on Network Rail Infrastructure have a greater obligation placed upon them to ensure that they comply with not only the Company Policy and procedures, but also the procedures and regulations laid out in various Rail Safety & Standards Board documents, and Network Rail documents.

These include:

GE/RT8070 Issue three - Testing Railway Safety Critical Workers for Drugs and Alcohol.

GE/GN8570 Issue two - Guidance on the Management of Drugs and Alcohol

NR/L1/OHS/051 Issue 5 - Level 1 Drugs and alcohol

NR/L2/OHS/018 Issue 4 - Level 2 Supplier requirements for the approval of medical assessments and drug and alcohol screening and certification.

3.0 Allocation of Responsibilities

The various responsibilities for the formulation, monitoring and implementation of this Policy and Procedures are outlined below:

Provision of resources to implement the Policy	Managing Director
Formulation and implementation of the Policy and Procedures.	SHEQ Manager and the Sentinel Coordinator
Audit and Review of the Policy and Procedures.	Managing Director, SHEQ Manager and the Sentinel Coordinator
On site implementation and monitoring of the Policy and Procedures.	Regional Operations Managers, Site Supervisor & individual personnel working for or on behalf of the company.
Reporting any identified deficiencies within the Policy or Procedures.	All of the above.

All employees must submit to an alcohol and drugs test if requested to do so.

Procedures are in place for the testing of the workforce to detect drugs and alcohol.

Testing will take place as a matter of routine in the following circumstances:

- Pre-employment/self-declaration testing.
- On transfer to the Company when individual holds an existing valid PTS card. Routine medical examinations and unannounced testing.
- 'For cause' testing – serious accidents/incidents.
- 'For cause' testing – behavioural.

Persons responsible:

John Booth, Managing Director

Paul Hayes, Operations Director

Michael Coates, SHEQ Manager

Andrew Suominen, Sentinel Coordinator

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The personnel with delegated responsibility for arranging the various testing are as follows:

Pre-employment medicals and testing. (Specific to Rail Infrastructure contracts)	Sentinel Coordinator
Routine testing	SHEQ Manager and the Sentinel Coordinator
Random / unannounced testing.	Directors, SHEQ Manager and the Sentinel Coordinator
'For Cause' testing.	Initiated by the Site Supervisor, coordinated through the SHEQ Manager and the Sentinel Coordinator.

Pre-employment and routine testing is required at the start of employment on the Rail infrastructure, and is undertaken before Sentinel competencies are undertaken.

These tests must be passed before any Sentinel training and competence test can be taken.

4.0 Random unannounced testing

All employees may be subject to unannounced testing and this will be undertaken on a random sample of the workforce. In addition, unannounced testing must be carried out on a minimum of 5% of the PTS workers annually. This applies equally to contract workers and Contractors who are under the Company's Sponsorship. The personnel tested can continue to work until the results of an unannounced test are received from the medical provider, unless there are grounds for stopping work. At some point a random unannounced test arranged in-house will be called for. Random testing does not exclude the possibility of being tested on site by Network Rail during the working shift.

The Sentinel Coordinator will offer to the Company Secretary a list of numbers from the Sentinel register. The Company Secretary will take 5% of the numbers at random from the register to allow those personnel to be tested. Tests will be booked in advance, but personnel will only be called for testing on the morning of the appointment.

'For-cause' testing will be carried out following an accident, when safety was compromised, the accident resulted in a fatality or when there is a formal enquiry.

'For cause' testing can also be undertaken when a person under the control of the Company behaves or gives grounds to suspect that they are unfit for work; or as part of an ongoing treatment programme for an alcohol-or-drug related problem. Any absence from normal duties to attend any such treatment programme will be recorded as normal sickness absence.

The Company reserve the right to invoke this testing under any of the above circumstances regardless of being on Network rail Infrastructure or not.



Whilst it is accepted that the Individual has to provide consent to a test being undertaken, it should be noted that the refusal to submit to testing is taken as a positive result, and the Sentinel competence will be revoked.

All Site personnel, particularly Site Supervisors, must report any individual, including Contractors who are suspected of being under the influence of alcohol or drugs to their Line Manager, and the Health and Safety Manager. The Company will then initiate 'for cause' testing on the individual.

The person being tested will be removed to a secure place, and accompanied until the testing has been completed. The employee is not permitted to resume work unless a negative test result is obtained.

Generally, the results will be communicated by 16.00hrs on the day after the sample for testing was obtained. Therefore, in the case of 'for cause' testing, this is likely to mean that the individual is not permitted to return back to work on the day of the test. Results of testing will be made known to the donor promptly and, if a positive test is received, the Company shall invoke its Disciplinary Procedures, Sentinel will be informed, and the Competence card will be removed.

For 'out of hours' support, please contact the SHEQ Manager.

5.0 What constitutes misuse of alcohol or drugs?

The Health and Safety Executive (HSE) define 'drug misuse' as the use of illegal drugs and the misuse whether deliberate or unintentional, of prescribed drugs and substances such as solvents.

Drug misuse can harm the misuser both physically and mentally and, through the misuser's actions, other people and the environment.

Historically, society regards alcohol, tobacco and caffeine differently from other drugs and the problems associated with their use are well documented. It should be remembered that simultaneous use of alcohol and drugs is particularly dangerous.

6.0 The legal position

There is a general duty under the Health and Safety at Work etc Act 1974, to ensure so far as is reasonably practicable, the health, safety and welfare of employees at work. The Management of Health and Safety at Work Regulations requires the employer, including Supervisors, to assess the risks to the health and safety of employees (an employee in respect to health and safety at work is anyone under the Company's control, including its Contractors).

If an employee is knowingly allowed to work under the influence of alcohol or drugs both the Company and its Supervisor could be subject to Criminal proceedings in the event that the said individual has or causes an accident. The individual will also be accountable for their own acts or omissions.

The Road Traffic Act states that any person who, when driving or attempting to drive a motor vehicle on a road or other public place, is unfit to drive through drink or drugs, they shall be guilty of an offence.

The principle legislation for controlling the misuse of drugs is the Misuse of Drugs Act. Nearly all drugs with misuse and / or dependence liability are covered by it. The Act makes the production, supply and possession of these controlled drugs unlawful except in certain specified circumstances such as when they have been prescribed by a doctor.

The Act lists the drugs that are subject to control and classifies them in three categories according to their relative harmfulness when misused.



CLASS A: includes ecstasy, cocaine, crack cocaine, heroin, LSD, methadone, magic mushrooms and crystal meth.

CLASS B: includes oral preparations of amphetamines, barbiturates, cannabis resin, codeine, ketamine, methylphenidate (Ritalin), synthetic cannabinoids and synthetic cathinones (eg mephedrone, methoxetamine)

CLASS C: includes most benzodiazepines, e.g. Temazepam and diazepam; gamma hydroxybutyrate (GHB), gamma-butyrolactone (GBL), piperazines (BZP), khat

7.0 Requirements of this Policy and Procedures

Employees and Contractors:

- Shall not come to work in an “unfit state” through alcohol or drugs; Shall not consume alcohol whilst at work;
- Shall not use, possess or supply any drug of abuse whilst at work;
- Shall not discontinue any agreed course of treatment for a alcohol or drug related problem without good reason;
- Shall tell their Supervisor or Line Manager if they are taking any medication (whether prescribed or bought “over the counter”), which may affect their ability to work safely;
- Shall tell their Supervisor or Line Manager or the Health and Safety Manager if they believe that they have or may have an alcohol or drug related problem, and Shall undergo testing for alcohol and drugs when requested to do so.

8.0 An “unfit state”

Drugs: means having taken or had administered either a dosage of any drug that could affect a person’s ability to work safely, or one or more drugs of abuse including, but not limited to, the following:

- Amphetamines
- Cannabis
- MDMA (Ecstasy)
- Opiates
- Benzodiazepines
- Cocaine
- Methadone
- Propoxyphene
- Magic Mushrooms
- So called Legal Highs

Individuals on medication of ‘over-the-counter’ drugs who are asked to supply a sample for testing, MUST provide relevant information to the collecting officer. Some drugs can affect performance and ability to work and can show as positive results when testing is undertaken. These include some brands of the following:

- Anti-depressants
- Cold and flu remedies
- Hay fever remedies and other anti-histamines
- Painkillers
- Sleeping pills
- Tranquillisers

Individuals have the right to appeal against a positive test at any time within 90 days of the test, and can also lodge an appeal if it is believed that the test result is incorrect or can demonstrate that they you were not aware at the time of the test that you had consumed alcohol or drugs.



Alcohol: means more than:

- More than 29 milligrams(mg) of alcohol in 100 millilitres(ml) of blood, or
- More than 13 micrograms of alcohol in 100ml of breath, or
- More than 39mg of alcohol in 100ml of urine.

It should be noted that the above limits apply to Rail and Network Rail working and are lower than the current permitted levels that allow individuals to drive on or in a public highway or place.

This equates to <1.5 units of alcohol (330ml bottle of Pils at 5% = 1.65 units) This level is less than half as much as is acceptable on the roads, which is 80mg of alcohol per 100ml of blood and equivalent to, 4 units of alcohol (375ml of red wine at 12% = 4.5 units). In Scotland the level is 50mg of alcohol per 100ml of blood.

There is a desire by the UK Government to lower the above limit from 80mg to 50mg of alcohol per 100 millilitres of blood, but at this precise moment in time, it is still 80mg/100ml.

9.0 Information and Assistance to employees

This information will be provided to new employees with their contractual Terms and Conditions of Employment, and also reiterated during the Company induction programme.

Amendments to the Policy and Procedures shall be communicated to all employees and personnel affected by its requirements, as and when any amendments are implemented.

All employees are encouraged to tell their Supervisor, Manager or the SHEQ Manager if they have or believe that they may be developing a drug or alcohol related problem.

Any employee who reports such a problem shall be dealt with in the strictest confidence but subject to the provisions of the law.

The Company shall offer support and assistance with regard to a rehabilitation programme through an independent programme coordinator, and shall continue to offer support and assistance so long as they remain in any programme of rehabilitation as agreed between the individual and the programme coordinator.

10.0 Breaches of Policy

Where a breach of this Policy or Procedures is identified through testing; this will automatically invoke the Company Disciplinary Procedures.

11.0 On Site Responsibilities

Employees and Contractors

Employees and Contractors shall comply with this Policy and Procedures

Supervisors and Line Managers

Supervisors and Line Managers shall make arrangements as outlined above, for "For Cause" testing of employees and contractors who are:

- Suspected of being unfit for work through drugs or alcohol,
- Involved in accidents or serious incidents.

12.0 Medication

Supervisors and Line Managers who receive information from employees that they are taking medication which may affect their ability to work safely shall:



- Verify the medication being taken,
- Assess whether the medication and medical reason presents a risk to the employee's ability to work safely,
- If necessary, re-allocate the employee to alternative duties whilst they are taking the medication, and if required, prevent them from driving on Company business, Seek additional advice from the SHEQ Manager where deemed necessary or in the event of any doubt as to the actions to take,
- Keep records of the notification by the employee of the type of medication declared, and the actions taken as a result of that declaration.

13.0 Results of Drug and Alcohol tests

Supervisors and Line managers shall ensure that the results of any tests are communicated as quickly as possible.

In the event that a Positive test result arises, the SHEQ Manager shall be involved prior to taking any subsequent action.

14.0 Drug and Alcohol related problems

Supervisors and Line Managers who are informed by employees that they are concerned they have or may be developing a drug or alcohol related problem shall:

- Relay the concerns raised to the attention of the SHEQ Manager,
- Arrange for the employee to be relieved of normal duties pending further discussions,
- Advise the employee that they will be counselled to determine an appropriate course of action to be taken.

15.0 The Company Obligation under the Policy

The Company shall have the following processes in place:

- Induction and briefing on the Drugs and Alcohol Policy and Procedures,
- Brief Supervisors and Line Managers on the Drugs and Alcohol Policy and their responsibilities and accountabilities within it,
- Arrangements for Drug and Alcohol testing prior to employment on Network Rail or Rail Infrastructure,
- Deal with cases of employees who report that they have or may be developing a drug or alcohol related problem and provide medical advice, counselling, support and actions plans as necessary,
- Enable employees to report the use of prescribed and over the counter medicines to their Supervisors or Line Managers, which will in turn allow the Supervisor or Line Manager to seek competent medical advice,
- Select employees for random testing for drugs and alcohol,
- Support Line Managers and Supervisors in implementing the Company Disciplinary Procedures against employees or Contractors who are in breach of the Policy or Procedures,
- Manage appeals against positive drugs and alcohol tests,
- Permit the rehabilitation of employees who have declared a problem,
- Maintain confidential records on employees files in relation to:
 - Declared drug and alcohol related problems and remedial action taken, Drugs and alcohol tests carried out under the Policy,
 - Any breaches of the Policy or Procedures.
 - Disciplinary action taken, and
 - Arrangements for their rehabilitation.
- Compile, analyse and monitor data relating to drugs and alcohol testing, numbers and results, sufficient to inform and identify any possible changes in risk levels.

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16.0 Guidance for Staff – Drugs and Alcohol

The short term effects of alcohol and drugs are to reduce co-ordination and perception, reaction speed and ability to react to and recognise danger, ability to judge distances and decision making ability. The consequences of these effects need no explanation when working in a Railway environment, driving Company vehicles or operating machinery or plant.

Long term effects of alcohol and drugs can include an increase in blood pressure, increase in weight, liver damage, heart disease and strokes.

To keep health risks from alcohol to a low level if you drink most weeks: men and women are advised not to drink more than **14 units** a week on a regular basis spread your drinking over 3 or more days if you regularly drink as much as **14 units** a week

The rate at which alcohol passes into the body is dependent on sex, age, weight, metabolism etc.

For example, a larger person may be able to drink more alcohol than a smaller person, and still be within the defined limits, whereas the smaller person may drink less alcohol and be above the defined limits.

Alcohol is eliminated from the body at a rate of 1 unit per hour regardless of size or gender.

Black coffee, cold showers and 'sleeping it off' have NO effect on the rate at which alcohol is eliminated from the body. This can be explained using the following examples:-

- 4 bottles of 5% Pils (6.2 units), if drinking finishes at 23:00hrs, it will be 05:00hrs before blood alcohol returns to its normal level.
- 1 bottle of red wine (9 units) if drinking finishes at 23:00hrs means 2 units of alcohol remain in the blood at 06:00hrs the following day. (above the Network Rail limit)
- 6 pints of Stella Artois (18 units) if drinking finishes at 23:00hrs, it will be 13:00hrs the following day before blood alcohol levels are below the Drink-Drive Limit and 15:30hrs before levels are below the Network Rail limit.

Basically, it is strongly advised that alcohol is not drunk in the 8 hours before reporting for work on Network Rail Controlled Infrastructure or driving on behalf of the Company.

The table on the following page gives a reference guide to units of alcohol, and below are a number of useful contacts.

17.0 Support agencies

NATIONAL DRUGS HELPLINE **Tel: 0800 0029010**: Offers a confidential telephone information and advice service for anyone who has a drug problem or is worried about someone who may be using drugs. It can arrange referral to appropriate agencies. All calls are free.

ALCOHOLICS ANONYMOUS **Tel: 0845 769 7555** 24hr helpline

CARE FIRST **Tel: 0800 174319** Counselling, Information and Advice.

18.0 Units of alcohol – reference guide

Taken from Network Rail Alcohol and Drugs Policy RT/LS/P/051 Issue 1 2004 (superseded)

**Beers and lagers**

Description	Popular Measure	Alcohol by Volume (ABV)	Units
Caffreys Bitter	Pint (568ml)	4.8%	2.81
Fosters Lager	Pint (568ml)	4.0%	2.34
Guinness Stout	Pint (568ml)	4.1%	2.40
Heineken Lager	Pint (568ml)	3.4%	1.99
John Smiths Bitter	Pint (568ml)	4.0%	2.34
Kronenberg	Pint (568ml)	5.0%	2.93
Worthington Bitter	Pint (568ml)	3.6%	2.11
Stella Artois Lager	Pint (568ml)	5.2%	3.05
Budweiser Lager	330ml	5.0%	1.65
Becks Lager	275ml	5.0%	1.38

Cider

Description	Popular Measure	Alcohol by Volume (ABV)	Units
Strongbow	Pint (568ml)	5.3%	3.11
Woodpecker	Pint (568ml)	3.5%	2.05

Wine

The alcohol strength of wines varies greatly. As a general guide, a 125ml glass of wine at 11% or 12% ABV contains 1.5 units, whilst a 175ml glass contains 2.25 units, and a 750ml bottle about 9 units. Be aware that some full bodied red wines are 14-15% ABV, and fortified wines (sherry, port, madeira etc.) are stronger still.

Spirit mixers

Description	Popular Measure	Alcohol by Volume (ABV)	Units
Baileys	50ml	17%	0.85
Smirnoff Ice	275ml	5.5%	1.51
Bacardi Breezers	275ml	5.4%	1.49
Archers Schnapps	275ml	5.5%	1.51
Gin/Vodka	25ml	40%	1
Whisky/Brandy	25ml	40%	1
Tia Maria	25ml	26.5%	0.66
Tequilla	25ml	38%	0.95



Alcohol and Drugs Policy

Pimms	25ml	25%	1.25
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Note: Limit of Network Rail Controlled Infrastructure <1.5 units of alcohol.

Limit for driving on the roads in England is <4.5 units of alcohol, less in Scotland.

Alcohol is eliminated from the blood at the rate of 1 unit per hour.

These measures are approximate. It is the responsibility of each individual to ensure that their alcohol levels are at all times below the prescribed limits whilst at work or controlling Company property.

19.0 Definitions

For the purpose of this policy, the following definitions apply:

Any time where a person is acting on behalf of the Company in accordance with its undertakings whether being paid or not, and includes commuting to a place of work that is not their usual place of work.

This policy and the Company Driver Policy also applies' to driving Company vehicles in personal time or for personal use.

Alcohol: An alcohol-related problem is defined as any drinking, either intermittent or continual, which interferes with a person's health and social functioning and/or work capability or conduct.

A substance that, when taken into the body, is capable of affecting mental or physical performance and includes:

Any psychoactive drug whether illegal, over-the-counter from pharmacies and other retail outlets, or legal substances such as solvents. In the case of prescribed drugs, their possession and proper use is acknowledged as legitimate.

Drug Misuse: Use of illegal drugs and the misuse, whether deliberate or unintentional, of solvents or prescribed medicines.

Drug Abuse: The use of a drug without legitimate medical need.

20.0 Relevant Legislation and Reference Documentation

- Misuse of Drugs Act 1971.
- The Road Traffic Act 1991.
- Health & Safety at Work etc Act 1974.
- The Management of Health and Safety at Work Regulations 1999.
- The Equality Act 2010

Sentinel Competence Control (Rail environments only):

NR/L2OHS/00120 Issue 5:- Testing for drugs and alcohol

GE/GN8570 Issue 2:- Guidance on the Management of Drugs and Alcohol

NR/L1/OHS/051 Issue 6:- Level 1 Drugs and alcohol

NR/L2/OHS/018 Issue 5:- Level 2 Supplier requirements for the approval of medical assessments and drug and alcohol screening and certification



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21.0 Updates and Reviews

This policy document comes into effect on:

14th February 2021

Review Date:

14th February 2022

Effective date:
14th February 2021

Review date:
14th February 2022

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Whistleblowing Policy Statement

1. INTRODUCTION

The Public Interest Disclosure Act 1998 and this policy protect employees from being dismissed or penalised for disclosing information in the public interest (more commonly referred to as 'whistleblowing') that they honestly and reasonably suspect exposes:

- A criminal offence, e.g. fraud
- The breach of a legal obligation
- A miscarriage of justice
- A danger to health and safety
- Risk/damage to the environment
- A cover-up of any of the above

The Act requires that the employee must first raise their concern with their employer and consideration has been given as to how best this can be done within Geotechnics Limited.

This policy applies to all employees at every level in the organisation and reinforces Geotechnics Limited's commitment to the health, safety and well-being of all staff.

2. THE POLICY

Geotechnics Limited positively encourages employees to speak out without fear of retaliation or unfair treatment, and to report where they genuinely feel a malpractice is taking place or health and safety standards are being compromised.

3. SCOPE

This policy applies to all Geotechnics Limited employees.

This policy supports and integrates with other policies. Geotechnics Limited will not tolerate discrimination, victimisation or harassment of employees. Incidents of this nature arising from or revealed as a result of 'whistleblowing' will be viewed seriously and dealt with in an appropriate manner.

4. THE DISCLOSURE REPORTING PROCESS

We recognise that employees are often the first to notice that there may be something wrong within the company. Most concerns are of a relatively minor nature that can and should be resolved through normal channels.

Wherever possible, staff should first raise their concern(s) with their Line Manager. However, where their Line Manager or other members of the management team may be involved in the alleged malpractice, it should be reported directly to the Directors.

When reporting a concern, the employee should give their name, location and a contact point.

Any matters raised in accordance with the above will be dealt with promptly, properly and in a way to maintain confidentiality.

Should employees prefer to speak to someone outside of Geotechnics Limited they can also raise their concerns with CIRAS (Confidential Incident Reporting & Analysis Service) via telephone (0800 4 101 101), post (Freepost: CIRAS) or text (07507 285 887).

Geotechnics Limited will not tolerate discrimination, victimisation or harassment of conscientious employees. Incidents of this nature arising from or revealed as a result of 'whistleblowing' will be viewed seriously and dealt with as a disciplinary matter.



John Booth

Managing Director

Version: 3.0

Issue date: 14th Feb 2021

Review date: 14th Feb 2022

Changes since last issue:

- Policy reference added



Supply Chain Policy Statement

Our aim is to engage with our supply chain in an open and collaborative manner to foster mutually beneficial and positive business relationships and, where possible, encourage better procurement of sustainable products, materials and techniques. As a business we are focussed on continuous improvement and organic growth, and encourage innovation wherever possible. We recognise the role our suppliers play and wish to share success with them.

We also recognise our responsibilities to the communities in which we work, and to support local economies where possible.

This policy has been developed to assist in compliance with our Quality, Health and Safety, and Environmental management systems. In doing so this document supports our ISO9001, ISO14001, and ISO45001 Policies. Reference should also be made to our Labour Standards Policy, Modern Slavery Policy, Anti-corruption Policy, and Sustainability Policy.

Engaging with our suppliers

- We shall be honest and fair in our dealings with our Suppliers
- We shall not engage in bribery
- We shall periodically assess and prequalify suppliers to ensure they meet our requirements
- We shall assess our Suppliers' services fairly based on a balance of resource availability, cost, knowledge and experience, and adherence to Geotechnics standards
- We shall ensure that payment terms are met
- We shall monitor supplier performance during, and at closeout, of every project. When necessary issues raised shall be discussed with our supplier as soon as practical with the aim of fair resolution
- We shall, where practical and cost effective, procure services and materials from sustainable sources
- We shall listen to our Suppliers and welcome any feedback on our business relationships

Supplier commitment to Geotechnics

- We expect our suppliers to be fully aware of our standards, procedures and policies and to share our commitment to their implementation
- We expect our suppliers to adhere to all current UK legislation
- We expect our suppliers to pay their staff a fair wage and provide good quality, safe working conditions
- We expect our suppliers to supply good quality products and materials from sustainable, local and ethical sources where practical
- We expect our suppliers to ensure everyone has the right competency and appropriate training to undertake their job
- We expect our suppliers to ensure all accidents and incidents are reported and undertake/assist in investigations as appropriate
- We expect our suppliers to protect the assets of Geotechnics and their clients, including confidential information

All Geotechnics employees responsible for procurement of any sort within the company will take a proactive role in implementing this policy.

This policy shall be reviewed annually. It shall be communicated to all staff via email, saved on our server, and copies will be posted on all our office and, where appropriate, site noticeboards. Furthermore, it will be made available to members of the public on request.

We welcome discussion and feedback from our Suppliers.

**We recognise the
role our suppliers
play and wish to
share success with
them**



John Booth

Managing Director

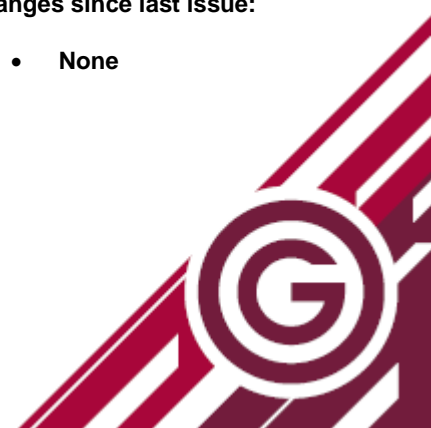
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- None



Social Media Policy

2020



Full Policy



Social Media Policy Guidelines

This document provides guidance and advice on how employees should use social media where it relates to Geotechnics Limited. Employees are able to access social media services and social networking websites at work, either through Company IT systems or through their own personal devices.

Social media is a wide-ranging term, which can include:

- Social networking sites like Twitter, Facebook and LinkedIn.
- Internal Social Media resources like Workplace and Slack.
- Social apps like Instagram and Snapchat.
- Online review sites like Trustpilot and Yelp.
- Blogs.
- Wikis.
- Message boards and forums.
- Chat rooms.

Due to the ever-changing pace of technology, this list is not exhaustive. Other websites and digital services that enable users to share information may be treated in the same way as the examples mentioned above. To maintain pace with technological change, our policy shall be reviewed every six months.

Why This Policy Exists

Social media can bring significant benefits to Geotechnics Limited, particularly when it comes to building relationships with clients, drillers and subcontractors. However, it is essential that people who use social media within the Company do so in a way that enhances the Company's prospects rather than damaging them. A misjudged status update or posting can generate complaints and damage the Company's reputation, whilst there are also security and data protection issues to consider.

This policy shapes how employees of Geotechnics Limited can use social media safely and effectively. This applies to all staff who use social media –whether it be for business or personal reasons. It applies to social media use on company premises, on site, whilst travelling, or at home.

Key Responsibilities

All staff members who use a social media account to talk about Geotechnics Limited and its work have responsibility for implementing this policy.

These people have key responsibilities:

- The Directors have ultimate responsibility for authorisation and implementation of this Policy.
- The Business Development & Marketing Manager is ultimately responsible for ensuring that Geotechnics Limited uses social media safely, appropriately and in line with the Company objectives and is responsible for following up requests from potential clients on social media.
- The IT Manager is responsible for managing protection against and dealing with any social media security threats.



Key Principles

1. Employees need to know and adhere to all other Company policies when using social media.
2. Employees should be aware of the effect their actions may have on their reputation, as well as the Company's public image. The information that employees publish may be accessible to the public for a long time.
3. Employees should be aware that Geotechnics Limited might monitor content and information published by employees through social media. Employees should use their best judgement and discretion in posting material that is neither inappropriate nor harmful to the Company, its employees, its clients or its collaborators.
4. Although not an exclusive list, some specific examples of prohibited social media conduct include posting commentary or content that is:
 - Likely to create a hostile work environment.
 - Harassing, intimidating or bullying.
 - Defamatory.
 - Pornographic.
 - Libellous.
 - Discriminatory.
5. Employees are not to publish, post or release any information about the Company, its clients or collaborators that is considered confidential or private. If employees have questions about what is considered confidential, they should contact the Marketing team for guidance.
6. Social media networks, blogs and other types of online content sometimes generate press and media attention or legal questions. Employees should refer any such inquiries to the Marketing team.
7. If employees encounter a situation while using social media that threatens to become antagonistic or hostile, the employee should disengage from the dialogue and seek the advice of the Marketing team.
8. Employees should get appropriate permission before referring to or posting images of current/ former projects, employees, clients or collaborators.
9. Employees should get appropriate permission to use a third party's copyrighted material, trademarks or other intellectual property.
10. Employees should not submit consumer reviews for Geotechnics Limited, nor for our competitors. This content would naturally be biased, and can result in legal liability and negative PR.
11. Staff members should be on guard for security threats such as phishing attempts, spam and malware. If you are worried about a potential threat, contact the IT team immediately.



Use of Company Social Media Accounts

This part of the social media policy covers the use of social media accounts owned and run by the Company. Geotechnics Limited's social media accounts may be used for many different purposes.

In general, employees should only post updates, messages or otherwise use these accounts when that use is clearly in line with the Company's overall objectives. For instance, employees may use Company social media accounts to:

- Share blog posts, photographs and other content created by the company.
- Share insightful articles, videos, media and other content relevant to the business, but created by others.
- Provide followers with an insight into what goes on at the company.
- Respond to client enquiries.

Social media is a powerful tool that changes quickly. Employees are encouraged to think of new ways to use it, and to put those ideas to the Business Development & Marketing Manager.

1. Only people who have been authorised to use the Company's social networking accounts may do so. Allowing only designated people to use the accounts ensures the Company's social media presence is consistent and cohesive. Authorisation is provided by the Business Development & Marketing Manager. It is typically granted when social media-related tasks form a core part of an employee's job.
2. New social media accounts in the Company's name must not be created unless approved by the Business Development & Marketing Manager. The Company operates its social media presence in line with a strategy that focuses on the most appropriate social networks, given available resources. If there is a case to be made for opening a new account, employees should raise this with the Business Development & Marketing Manager.
3. Company social media accounts must not be used to share or spread inappropriate content, or to take part in any activities that could bring the company into disrepute.
4. Company social media accounts should be protected by strong passwords that are changed at least every 3 months and shared only with authorised users. These passwords must not be used for any personal accounts.
5. Wherever possible, employees should use two-factor authentication (otherwise known as mobile phone verification) to safeguard Company accounts.



Use of Personal Social Media Accounts

Geotechnics Limited recognises that employees' personal social media accounts can generate a number of benefits for the Company. For instance:

- Staff members can make industry contacts that may be useful to their jobs.
- Employees can discover content to help them to learn and develop in their role.
- By sharing content about the company, staff members can help to build the business' profile online.

As a result, the Company is happy for employees to use their personal social media accounts at work on the following basis:

1. Employees may use their personal social media accounts for work-related purposes during regular hours, but must ensure this is for a specific reason (e.g. market research, technical reference). Social media should not affect the ability of employees to perform their regular duties. Excessive use of social media networks is discouraged and could result in disciplinary action.
2. Use of social media accounts for non-work purposes is restricted to non-work times, such as during breaks and lunch. The use of social media should not interfere with an employee's work or responsibilities.

3. Employees should ensure that it is clear that comments in their social media accounts do not represent the views or opinions of Geotechnics Limited. Staff should include a disclaimer in their social media profiles, such as: "The views expressed are my own and do not necessarily reflect the views of my employer".
4. When writing about the Company on social media, staff should make clear to readers that they are an employee of Geotechnics Limited.
5. Employees should not post information about the Company that may appear to be formally sponsored by Geotechnics Limited. For example, they should not create a post that looks like an official Geotechnics Limited press statement.
6. Employees must not:
 - Create or transmit material that might be defamatory or incur liability for the Company.
 - Post messages, status updates or links to material or content that is inappropriate.
 - Use social media for any illegal or criminal activities.
 - Send offensive or harassing material to others via social media.
 - Broadcast unsolicited views on social, political, religious or other non-business related matters.
 - Send or post messages or material that could damage Geotechnics Limited's image or reputation.
 - Interact with Geotechnics Limited's competitors in any ways which could be interpreted as being offensive, disrespectful or rude.
 - Discuss colleagues, competitors, customers or suppliers without their prior approval.
 - Post, upload, forward or link to spam, junk email or chain emails and messages.
7. When using social media in a personal capacity, employees should always use their personal email - not their Geotechnics Limited email address. The only exception is for websites used for professional development and association, such as LinkedIn. In this case, employees should never use the same password as they use for their Geotechnics Limited network login or email account. Passwords for Geotechnics Limited network log-ins/email accounts must remain confidential.



Security and Data Use

Employees should be aware of the security and data-protection issues that can arise from using social networks. Users must not:

- Share or link to any content or information owned by the company that could be considered confidential or commercially sensitive. This might include sales figures, details of key customers, or information about future strategy or marketing campaigns.
- Share or link to any content or information owned by another company or person that could be considered confidential or commercially sensitive. For example, if a competitor's marketing strategy was leaked online, employees of Geotechnics Limited should not mention it on social media.
- Share or link to data in any way that could breach the Company's data protection policy, or contravene the General Data Protection Regulation (GDPR) (EU) 2016/679.

Policy Enforcement

Company IT and internet resources – including computers, smartphones and internet connections – are provided for legitimate business use. The company therefore reserves the right to monitor how social networks are used and accessed through these resources. Any such examinations or monitoring will only be carried out by authorised staff.

Additionally, all data relating to social networks written, sent or received through the Company's computer systems is part of official Geotechnics Limited records. The Company can be legally compelled to show that information to law enforcement agencies or other parties.

Potential Sanctions

Knowingly breaching this social media policy is a serious matter. Users who do so will be subject to disciplinary action, up to and including termination of employment.

Employees may also be held personally liable for violating this policy. Where appropriate, the Company will involve the police or other law enforcement agencies in relation to breaches of this policy.

If you become aware of any violations of this policy, notify the Business Development & Marketing Manager. We may request that employees change or remove comments made on social media that are inconsistent with this policy or that make inaccurate references to the Company or its stakeholders.

If you require any further information about this policy or have any questions, please contact the Marketing team.

ANTI CORRUPTION POLICY

Bribery Act 2010

GEOTECHNICS LIMITED
The Geotechnical Centre
203 Torrington Avenue
Tile Hill
Coventry
CV4 9AP

Company No. 1757790

SIGNED:



PRINT:

JOHN BOOTH

JOB TITLE:

MANAGING DIRECTOR

ISSUED:

14/02/2021

REVIEW:

14/02/2022

1. Introduction

- 1.1 This document sets out the policies and procedures of the Company in relation to antibribery and corruption matters in the United Kingdom.
- 1.2 Compliance with the Company's policy in relation to bribery and corruption is regarded as part of your contract of employment. If you fail for any reason to follow the policies set out in this document this may result in disciplinary action being taken against you which could result in your dismissals.

2. Definitions

- 2.1 Bribery is the offer or receipt of any gift, loan, payment, reward or other advantage to or from any person as an encouragement to do something which is dishonest, illegal or a breach of trust, in the conduct of the Company's business.
- 2.2 Corruption is the misuse of entrusted power for private gain.
- 2.3 To place this in context, you should be aware that if you engage in activities which are contrary to UK anti-bribery and corruption legislation, you could face up to 10 years in prison and/or an unlimited fine, and the Company could also be liable to an unlimited fine and Government sanction.
- 2.4 This policy document is not regarded as exhaustive, but does give specific examples of situations and sets out the procedures and policies which should be followed.
- 2.5 If you are at any time uncertain as to whether your actions will comply with this policy, you must seek guidance from the Managing Director.

3. What To Do

- 3.1 You should at all times act in accordance with the following provisions:
- Behave honestly, be trustworthy and set a good example;
 - Use the resources of the Company in the best interests of the Company and not misuse those resources;
 - Make a clear distinction between the interests of the Company and your private interests to avoid any conflict of interest, and if such conflict does arise you should report it to the Managing Director immediately;
 - Ensure that any community support, sponsorship and charitable donations do not constitute bribery, and if in doubt you should consult with the Managing Director.
 - Confidentially report all incidents, risks and issues which are contrary to this policy document to the Managing Director;

- If you have any questions regarding anti-bribery and corruption laws and the Company's policies, these should be raised with the Managing Director. Queries will be dealt with anonymously and a written response will be issued.

4. What Not To Do

- 4.1 Employees should be fully aware of their responsibilities and should make themselves aware of what could be construed as a bribe or a gift.
- 4.2 Employees should not offer or accept bribes.
- 4.3 Employees should not offer money to any public officials in order to speed up service or gain improper advantage. This type of bribery is a "facilitation payment" and is illegal. If you are faced with a demand for a facilitation payment you must:
 - Actively resist the payment; and
 - Inform the Managing Director

5. Gifts

- 5.1 Employees should not without express prior written approval from the Managing Director offer or accept any gifts worth above £50 to or from clients, contractors, suppliers, other third parties or public officials.
- 5.2 Gifts are presents such as flowers, vouchers, food and drink. Event and travel tickets given to you as an individual are also gifts when they are not to be used in a hosted business context.

6. Hospitality

- 6.1 Employees should not, without express prior written approval from the Managing Director, offer or accept hospitality worth above £50 to or from clients, contractors, suppliers, other third parties or public officials.
- 6.2 Hospitality includes invitations to hosted meals, receptions and events for business purposes.

7. Compliance with the Policy

- 7.1 By complying with this policy document we aim to ensure that you and the Company will not at any time knowingly breach any relevant anti-bribery and corruption legislation and also that by adhering to the policies and procedures there will be a body of evidence built up to show that if there were any allegation of bribery or corruption the Company in defence can demonstrate that it has adequate procedures in place to prevent such activity.

- 7.2 You have an independent obligation to prevent bribery and corruption in the Company and to ensure that any interaction with public officials complies with this policy document and relevant laws.

Modern Slavery Policy Statement

Geotechnics Limited was established in 1983 to provide the full spectrum of services covering the design, implementation, interpretation and evaluation of geotechnical and contaminated land site investigations. It is now one of the largest independent specialists in the United Kingdom. The head office and laboratory are based in Coventry, with additional offices in Exeter, Chester and Yorkshire.

This policy is in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes the Company slavery and human trafficking statement. The Company undertakes to adhere to the provisions of the Act and any amendments or new legislation which come into force. The Company will not knowingly support or deal with any business involved in slavery or human trafficking.

The Directors acknowledge their personal and specific role in establishing this Policy and its implementation.

It should be noted that in accordance with The Modern Slavery Act 2015, Section 54 "Transparency in supply chains etc.", sub-section 3.1 Geotechnics Limited is not required to produce an annual report on slavery and human trafficking as our annual turnover is less than £36 million.

Geotechnics Limited recognises that slavery and human trafficking remains a hidden blight on our global society, and that the Company has a responsibility to contribute to overcoming this issue as far as is reasonably practicable.

This policy statement outlines our proposed approach:

- To act ethically and with integrity in all our business relationships and to collaborate with our Clients and supply chain to promote good practice.
- Alert staff to the risks, however small, in our business and in the wider supply chain. Staff shall be expected and encouraged to report concerns to management, who shall be expected to act upon them.
- To take into account, and support the policies, procedures and requirements documented in our Integrated Management System, compliant with the requirements of ISO 9001:2015, ISO 14001:2015, and ISO 45001:2018.

How we propose to achieve this:

- Establish disciplinary procedures where they are breached internally.
- Review of this Policy by the Directors on a regular basis to ensure its continuing suitability and relevance to the company activities.
- Communicate the policy, implementation measures, and implications to all Company staff and supply chains where relevant.
- Continual audit and review of our practices to ensure all employees are paid at least the living wage and have the right to work.
- Encourage the reporting of concerns and the protection of whistle blowers.

We recognise that slavery and human trafficking remains a hidden blight on our global society, and that the Company has a responsibility to contribute to overcoming this issue as far as is reasonably practicable.



John Booth

Managing Director

Version: 5.0

Issue date: 14th Feb 2021

Review date: 14th Feb 2022

Changes since last issue:

- None



Working Hours and Management of Fatigue for Rail Workers Policy Statement

Geotechnics recognises the importance of the management of fatigue in ensuring the health, safety and wellbeing of our staff, and all those affected by our operations, therefore our activities are planned to minimise the risk of fatigue amongst our workforce.

This statement sets out the company's policy in respect of fatigue management and employee's or subcontractors hours of work when engaged on Network Rail projects.

Our rules on working hour limits comply with Network Rail Standards NR/L2/ERG/003 – *Fatigue Risk Management* and NR/GN/INI/001 - *Guidance on the Management of Door to Door Work & Travel Time*.

In accordance with Network Rail guidance, the following working time limits shall apply to all Geotechnics staff and subcontractors when working on Network Rail Managed Infrastructure (NRMI):

- No more than 12 hours to be worked per period of duty/shift
- No more than 72 hours to be worked in any 7-day period
- A minimum of 12 hours' rest between booking off from a period of duty/shift to booking on for the next period of duty/shift
- No more than 13 periods of duty or shifts to be worked in any fourteen-day period
- Door to Door Time (defined as the combined total of travel time and work time) should not be planned to exceed 14 hours in any 24-hour period.

To ensure work is planned to comply with working time limits, a Working Hours Assessment Form is required to be completed prior to the commencement of rail work.

Exceedance of working time limits should never be planned, however it is recognised that exceedances may sometimes be necessary due to unforeseen circumstances that if not addressed could endanger the safety of NRMI or cause severe disruption to rail services.

In such circumstances both the Client's Representative and Geotechnics' supervisory staff are required to carry out a risk assessment and complete Geotechnics form RD01 'Risk Assessment for Extension of Hours on Site' to ensure that the exceedance in working hours or Door to Door Time does not impact on the safety of staff or other individuals. The risks assessment forms should be handed to the project manager or rail coordinator to allow review and changes to be made to prevent further exceedances from occurring on future shifts.

We recognise the importance of the management of fatigue in ensuring the health, safety and wellbeing of our staff and those affected by our operations.



John Booth

Managing Director

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Changes since last issue:

- None



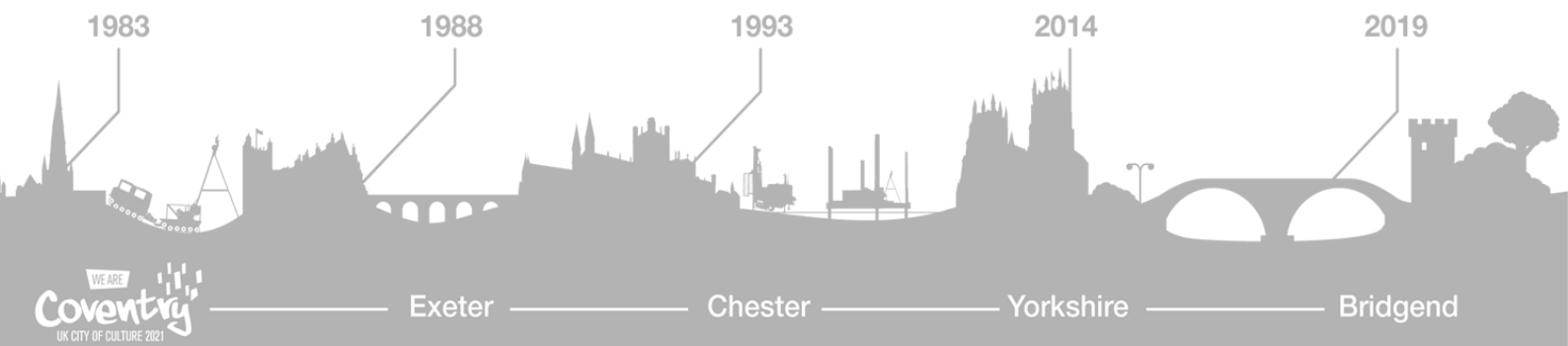
Asbestos Policy

POL013 Rev 4.0



Asbestos Policy

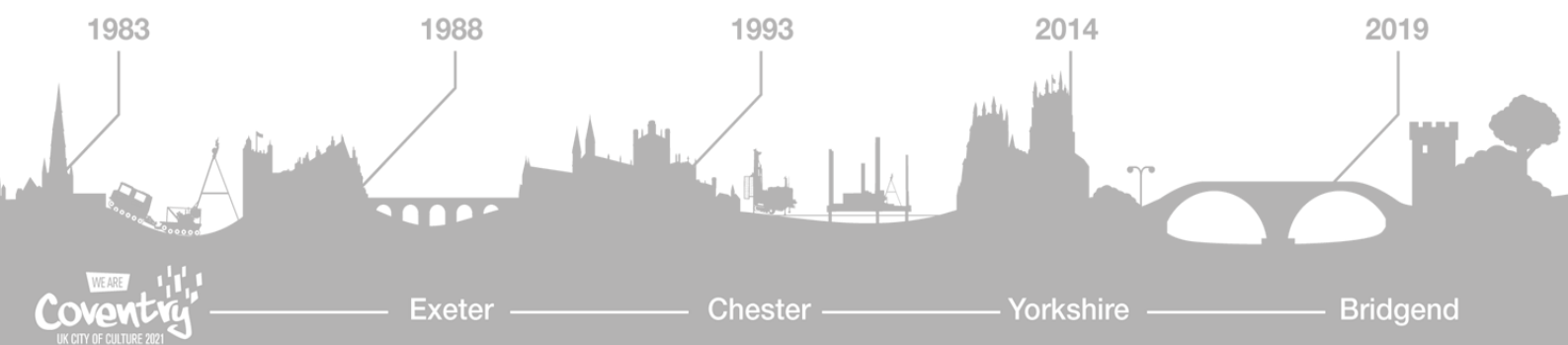
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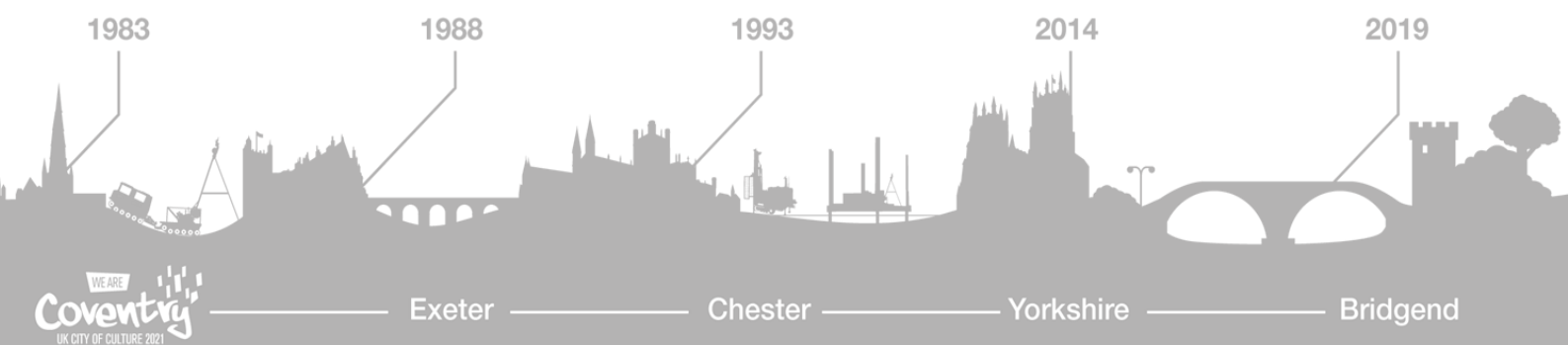
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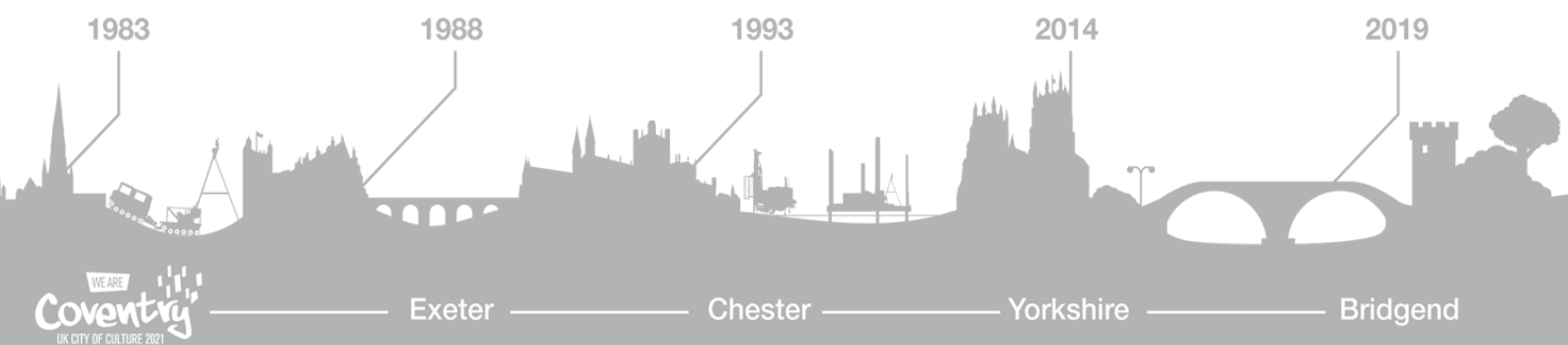


GLOSSARY

ACM:	Asbestos-containing Materials are either known to contain asbestos, or presumed to contain asbestos
CAR:	The Control of Asbestos Regulations 2012
Competency:	Ability to apply knowledge and skills to achieve intended results.
Supplier:	Person or company contractually employed to work on behalf of Geotechnics Limited, who are not employees.
Document:	Information and its supporting medium.
Friable:	Easily broken into small fragments, crumbled, or reduced to powder.
Hazard:	The potential of a substance, activity or process to cause harm. A hazard can be ranked relative to other hazards or to a possible level of danger.
HSE:	The Health and Safety Executive - www.hse.gov.uk
Ill Health:	Identifiable, adverse physical or mental condition arising from and, or made worse by an activity and, or work-related situation.
Incident:	A work-related event(s) in which injury or ill health (regardless of severity) or fatality occurred, or could have occurred.
	An accident is an incident which has given rise to injury, ill health or fatality.
	An incident where no injury, ill health or fatality occurs may also be referred to as a “Near Miss” or “Dangerous Occurrence”.
Near Miss:	Any unplanned or uncontrolled event, or chain of events, that has not resulted in an injury requiring first aid or medical treatment, a specified dangerous occurrence, ill health, damage to plant, property or the environment, or loss of production, but has the potential to do so in other circumstances.
Non-Conformity: (NC)	A deviation from work standards, activities, practices, processes, procedures, regulations, management system performance that could lead either directly or indirectly to a nonfulfillment of established procedures.
Organisation:	Company, organisation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public or private, that has its own functions and administration.



Policy:	The organisation's overall intention and direction related to its health & safety, environmental and quality performance as formally expressed by the Senior Management Team.
PPE:	Personal Protective Equipment, equipment designed to be worn by the individual as a last resort in protection against an identified risk, as detailed in the hierarchy of risk.
Procedure:	Specified way to conduct an activity or a process.
Process:	A system of activities, which transforms inputs into outputs.
Records:	Documents stating results achieved or providing evidence of activities performed, this can include minutes from meetings, calibration records, monitoring results and incident report.
Risk Assessment:	A process of formally estimating the magnitude of risk associated with an activity and the deciding outcome of its tolerable risk.
Risk:	<p>Effect of uncertainty. The likelihood of a substance, activity or process to cause its adverse effects, together with a measure of the effect. A risk can be reduced in order to control the hazard.</p> <p>Combination of the likelihood of an occurrence of a hazardous event or exposure(s) and the severity of injury or ill health that can be caused by the event or exposure(s).</p>
Senior Managers:	All senior management with specific responsibilities, these include Managing Director (MD), Finance Director (FD) Operations Director (OD), Commercial Manager (CM), Laboratory Manager (LM), Chief Geotechnical Engineer (CGE), Safety, Health, Environment & Quality Manager (SHEQM), Business Development Manager (BDM), IT Manager (ITM) and Drilling Manager (DM).
SHEQM:	Safety, Health, Environment & Quality Manager, appointed person employed by Geotechnics Limited.
SWP:	Safe Working Procedure.
Unsafe act or Condition:	Any observed act or condition with the potential to cause or result in harm (e.g. unsafe work practices, trip hazards, missing edge protection etc.). These apply to all activities or situations on site, whether or not they may be attributed to Geotechnics Limited operations.
Workplace:	<p>Any physical location in which work related activities are performed under the control of Geotechnics Limited:</p> <p>When considering what constitutes a workplace, the organisation should consider the OH&S effects on personnel who are, for example, travelling or in transit, working at the premises of a client.</p>



1. Regulations and Guidance

The Control of Asbestos Regulations 2012 (CAR2012) require that employer's do all that is reasonably possible to prevent the exposure of employees to asbestos fibres.

CAR-SOIL 2016 provides specific guidance to the site investigation industry, in general that any works which may lead to an exposure that is more than sporadic and of low intensity, may only be undertaken by properly licensed specialist companies and/or fully trained competent personnel and may be notifiable to the HSE. This should be referenced during any works where asbestos may be encountered.

2. Insurance

Our Insurance Policy indemnifies the Company against our liability to pay damages and defence costs arising from the existence of or exposure to CAR2012 Regulation 3(2)

Indemnity will only apply when the Company is engaged in work with asbestos for which a licence is not required.

CAR2012 Regulation 3(2) exemption criteria:

- a) The exposure to asbestos of employees is sporadic and of low intensity; and requirements not stated by the Client but necessary for the specified or intended use of the services are identified.
- b) It is clear from the risk assessment that the exposure to asbestos of any employee will not exceed the control limit; and
- c) the work involves:
 - Short, non-continuous maintenance activities in which only non-friable materials are handled, or
 - Removal without deterioration of non-degraded materials in which the asbestos fibres are firmly linked in a matrix, or
 - Encapsulation or sealing of asbestos-containing materials which are in good condition, or
 - Air monitoring and control, and the collection and analysis of samples to ascertain whether a specific material contains asbestos.



3. Company Asbestos Policy

Geotechnics Limited was established in 1983 to provide the full spectrum of services covering the design, implementation, interpretation and evaluation of geotechnical and contaminated land site investigations. It is now one of the largest independent specialists in the United Kingdom. The head office and laboratory are based in Coventry, with additional offices in Exeter, Chester and Yorkshire.

This policy statement outlines how Geotechnics Ltd will manage the risk posed by asbestos containing materials (ACMs) to all employees, visitors and anyone else likely to be affected by the company's work activities on a site, in the laboratory, in the office or stores.

- Geotechnics Ltd will aim to meet its statutory obligations, this includes the requirements of the Control of Asbestos Regulations 2012, Industry guidance CAR-SOIL 2016 and associated Approved Codes of Practice and Guidance Notes produced by the Health and Safety Executive through the implementation of this policy.
- We intend to implement the policy through procedural arrangements laid down in this policy and relevant procedures under our management systems.
- All Geotechnics employees and contractors have a duty of care to work in a safe manner and to comply with the policy requirements in relation to their work activities.
- We will implement procedures to prevent, in as far as is reasonably practicable, ACMs giving rise to health risks.
- To achieve and maintain effective management of the risk posed by ACMs, we will comply with the requirements of the Control of Asbestos Regulations (CAR) 2012 and follow supplementary Health and Safety Executive Approved Codes of Practice and Guidance Notes.
- Asbestos awareness training will be provided every 12 months for all employees with the potential for encountering ACM's

Delegated responsibilities, procedures and arrangements developed to implement this Policy and to comply with current legislation are detailed in this policy and supporting procedures.

Geotechnics Ltd will manage the risk posed by asbestos containing materials (ACMs) to all employees, visitors and anyone else likely to be affected by the company's work activities



John Booth

Managing Director

Revision: 4.0

Issue date: 20th August 2021

Review date: 20th August 2022

Changes since last issue:

- None

4. Upkeep and review of Asbestos Policy

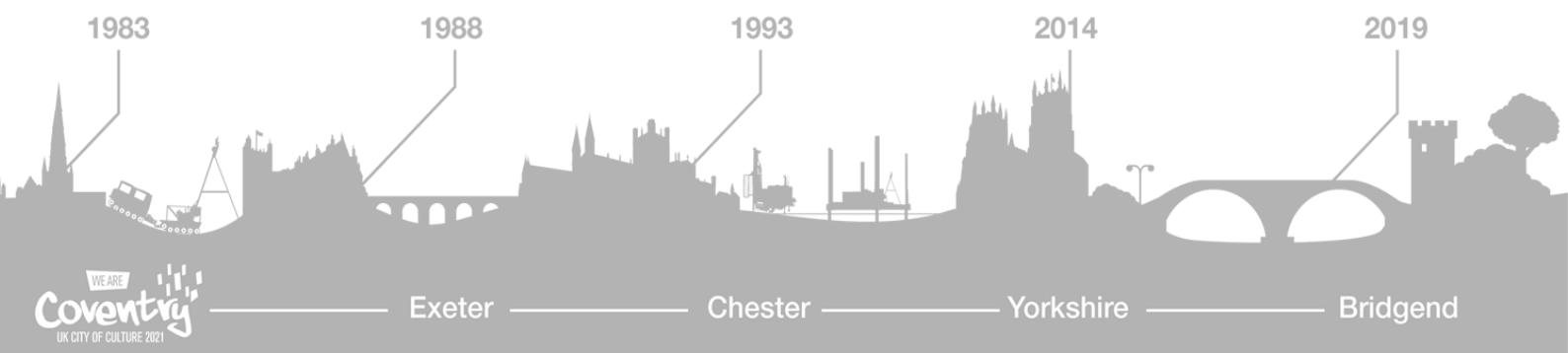
The Asbestos Policy shall be reviewed annually or following any changes in legislation or working practices.

The following personnel are responsible for preparing and approving this Policy and any changes to it:

Preparation: SHEQ Manager

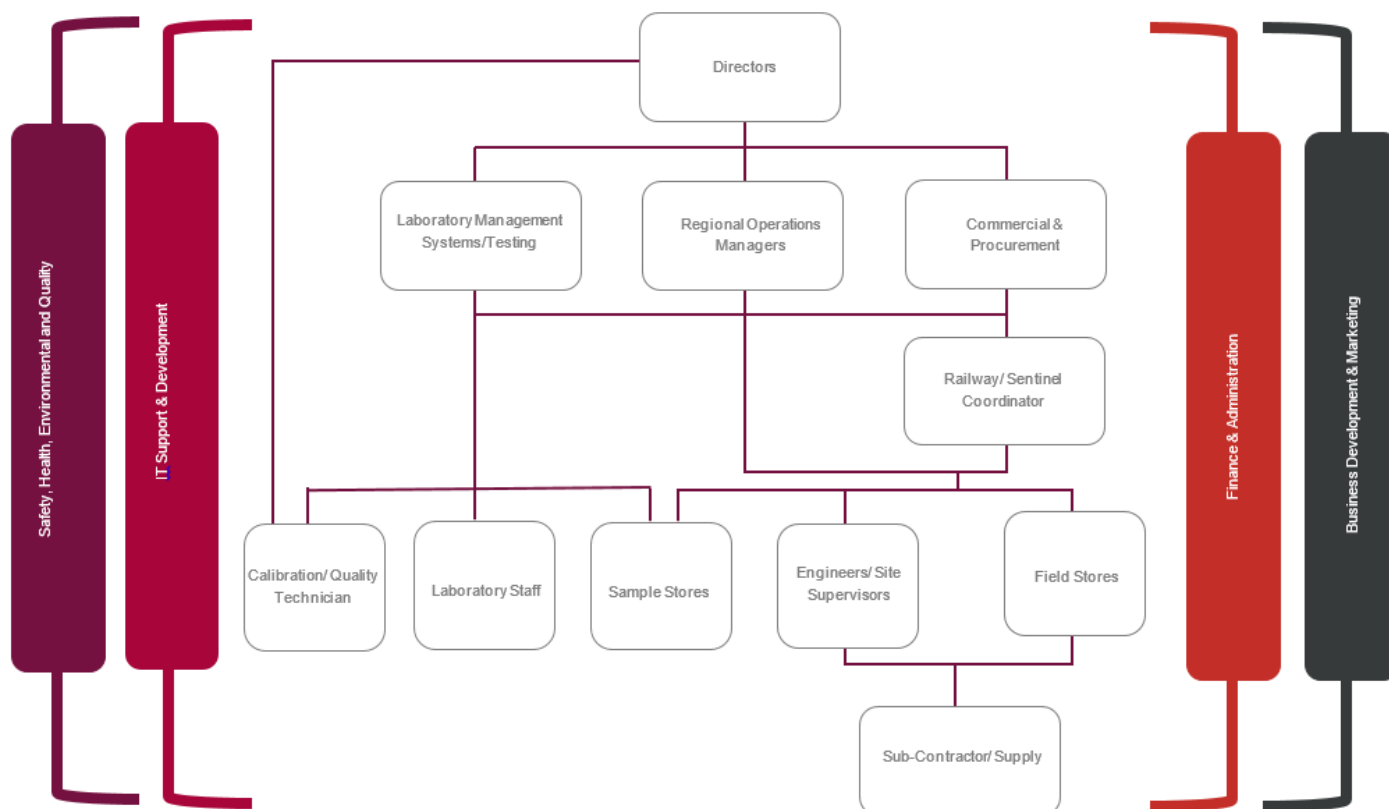
Approval: Managing Director

Any updates to the Asbestos Policy shall be communicated to all employees via email and the latest revision made available on Company G Drive.



5. Responsibilities

To ensure management suitable responsibility has been identified and delegated to the relevant authority, and roles. Responsibilities and authorities are detailed below and are also included in the Company's policies, procedures, work and safety instructions.



The key Senior Management roles with Asbestos Policy responsibilities are held by the following people:

Managing Director
 Finance Director
 SHEQ Manager
 Operations Director
 Regional Operations Manager (Coventry)
 Regional Operations Manager (Chester)
 Regional Operations Manager (Exeter)
 Regional Operations Manager (York)
 Laboratory Systems Manager
 Environmental & Railway/Sentinel Coordinator
 Principal Geoenvironmental Engineer

John Booth
 Dawn Wadsworth
 Michael Coates
 Paul Hayes
 Robert Webster
 Jon Hutchinson
 Hannah Dwane
 Vacant (Emily Vickers - Acting ROM)
 William Elson
 Andrew Suominen
 Nick Frost

5.1 Managing Director

The Managing Director has ultimate responsibility and accountability within the Company for achieving the objectives of the Asbestos Policy.

5.2 SHEQ Manager

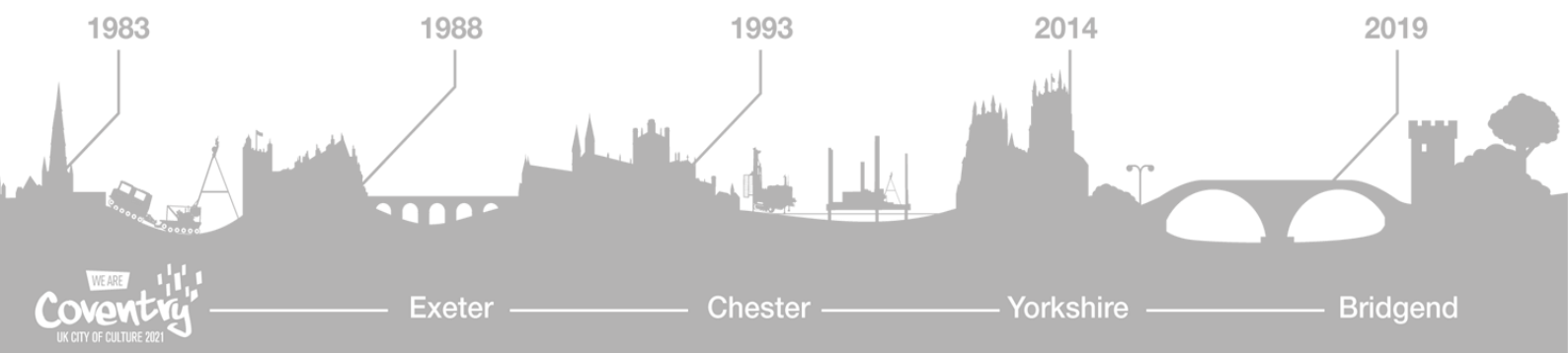
The SHEQ Manager is responsible for:

- a) The upkeep of information regarding Health, Safety and Welfare, including the Law, the management of health and safety and technical advances.
- b) Providing advice and guidance on health, safety and welfare matters to the Managers of the Company in order for them to deliver their delegated responsibilities.
- c) The upkeep of information regarding Asbestos, including current legislation and advice on the management of Asbestos.
- d) Providing advice and guidance on Asbestos matters to the Managers of the Company in order for them to deliver their delegated responsibilities.
- e) Ensuring consultation with all employees and representatives of employee safety regarding Asbestos control measures.
- f) Auditing, review and writing of Asbestos safety procedures for approval by the Managing Director.
- g) Bringing training and information needs in relation to Asbestos to the attention of the Managing Director, Operations Director, Regional Operations Managers and Laboratory Managers.
- h) Cascading information, amendments and revisions to Company procedures to all employees, taking into account the level of training and knowledge of the employees.
- i) Investigating employee complaints, accidents, incidents and, where appropriate, 'near-misses' in respect to Asbestos.

5.3 Regional Operations & Laboratory Managers

The Operations Director, Regional Operations and Laboratory Managers are responsible for:

- a) Ensuring that the requirements of CAR 2012 so far as it applies to their particular operations are carried out.
- b) Ensuring that the Company's Asbestos Policy and Procedures are observed by all persons under their control.
- c) Assessing the Competence of individuals prior to assigning tasks and arranging for adequate information, instruction, training and supervision to be given to each and every employee as is necessary for them to carry out their duties safely.



5.4 Principal Engineers, Site Engineers/Supervisors

Engineers of all grades and Supervisors have a direct responsibility for implementing the Asbestos Policy of the Company. To enable that responsibility to be effectively discharged they must:

Be familiar with all Asbestos Procedures and Company rules having effect on employees under their supervision, and ensure that these are observed by all employees.

Ensure that all personnel under their control know and understand their individual responsibilities under the Asbestos Policy and that they are equipped to fulfil their obligations.

Actively promote the Company's Asbestos policy and procedures.

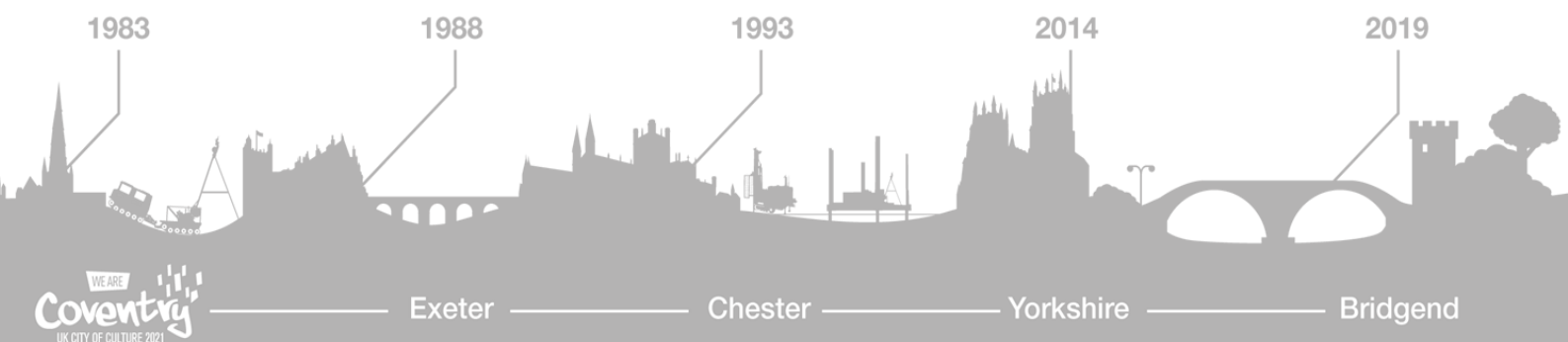
Ensure that all matters of Asbestos receive full consideration in:

- a) Field operations and operations within the office and laboratory / stores.
- b) The planning of future operations.
- c) The design of new procedures and operating methods.
- d) All operations, both routine and non-routine.
- e) Adequate training and proper supervision of employees.
- f) Scheduling testing on Made Ground

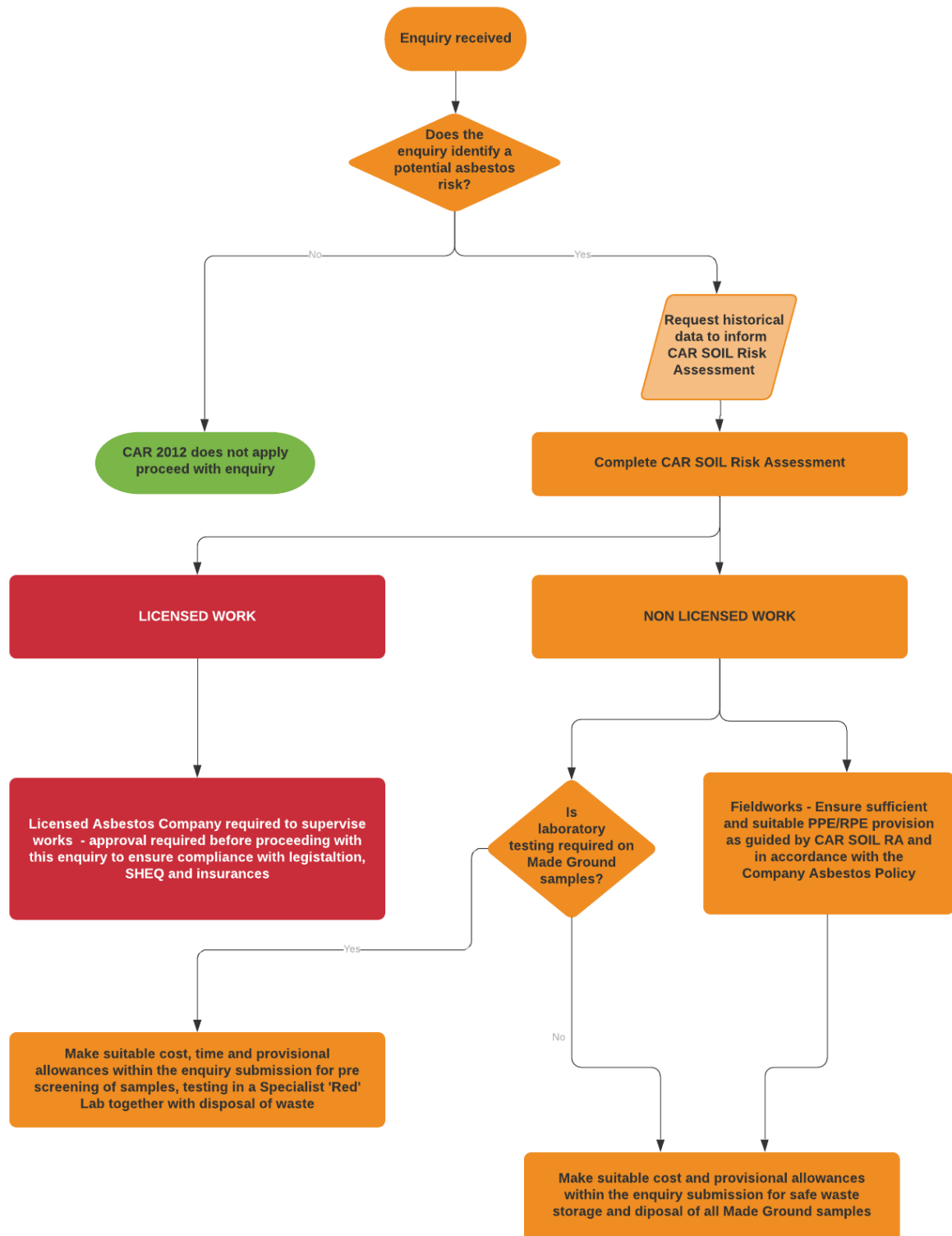
5.5 All Employees

All employees employed by the Company are required to:

- a) Read and understand the Company's Asbestos Policy and Procedures, and ensure that their work is carried out in accordance with the relevant requirements.
- b) Report immediately as appropriate to your Line Manager, any possible ACM's encountered on site, if appropriate, report to the representative of employee safety and SHEQ Manager.
- c) Work in a safe manner at all times and not take unnecessary risks which could disturb potential ACM's.
- d) Advise and warn other employees and anyone in the area of potential ACM's encountered on site.



6. Enquiry Decision Process



1983

1988

1993

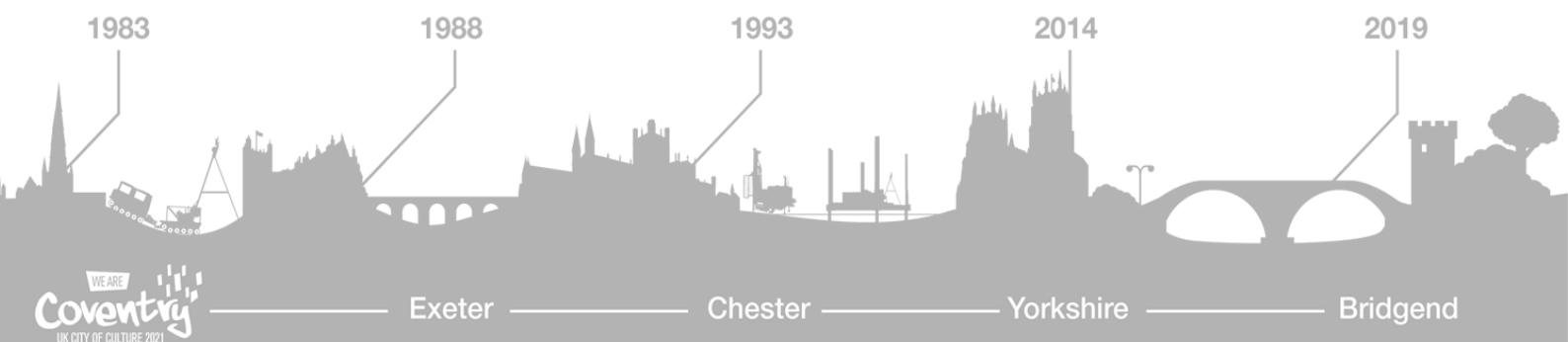
2014

2019

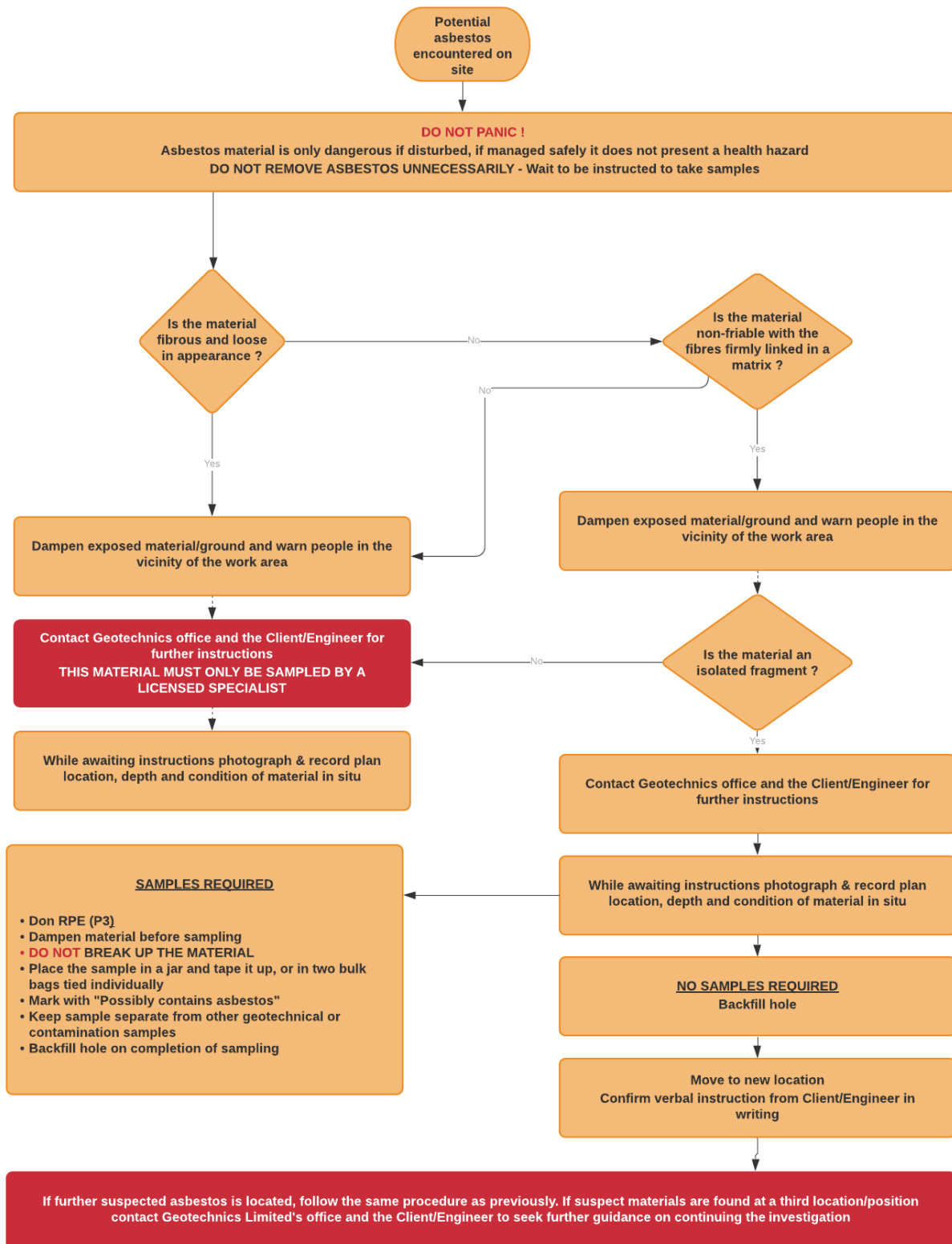
7. Site Procedures

In all situations in which asbestos may reasonably be suspected, anticipated or known, it is the duty of both the Employer and Employee to undertake an assessment of the potential associated risks before undertaking the works. As an unlicensed company, Geotechnics Limited is by default forbidden from undertaking any licenced or licensable asbestos works. It is also envisaged that in general potentially notifiable works will not be undertaken or will only be undertaken on a site and contract-specific basis, usually under the supervision of and/or with the assistance of competent licenced operatives.

All proposed works undertaken by the Company must be risk assessed prior to their being undertaken as a matter of company policy under ISO45001, ISO9001 and ISO14001 procedures.



7.1 Field procedure if potential ACM's are encountered



1983

1988

1993

2014

2019

8. Laboratory Procedures

The Company is not licenced to examine or test samples for asbestos. It does not currently have either the facilities or capability to process samples that contain asbestos when undertaking geotechnical analysis of soils to British Standards that often requiring drying and crushing. Such analysis is considered to encompass those conditions most likely to have the potential to release asbestos fibres into the air from such a matrix and hence such activity may lead to a potentially significant fibre exposure. In order to protect its workforce as required by law and CAR2012, Geotechnics Limited cannot knowingly undertake physical analysis/testing on any samples known or suspected to contain asbestos.

All Made Ground has the potential to contain Asbestos and the risk must be assessed prior to testing in a Geotechnical laboratory.

A visual assessment on site by the driller and the engineer while logging will identify samples that are potentially described as 'Made Ground'. These will be marked as Made Ground/Possible Made Ground as appropriate on the exploratory hole records.

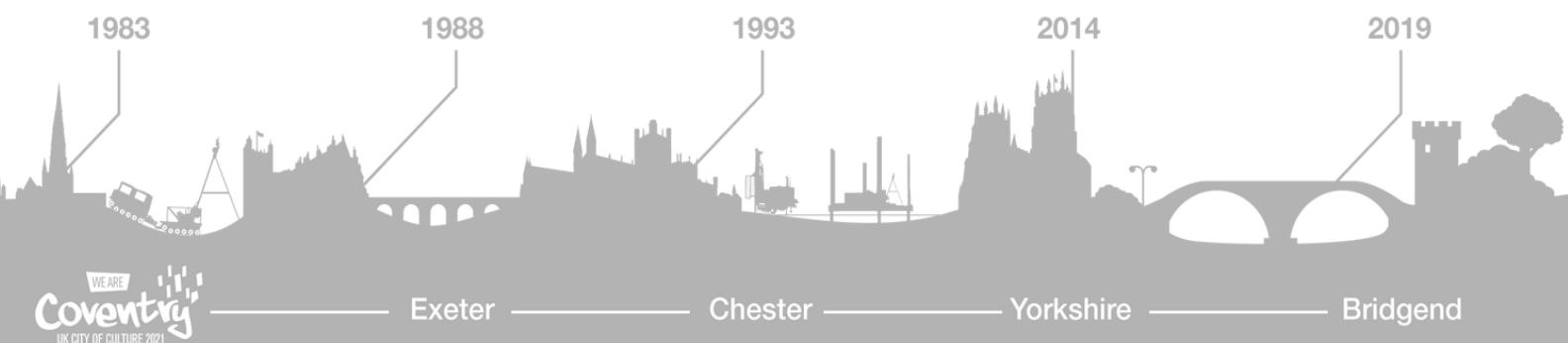
If geotechnical testing is required on Made Ground samples the risk of the samples containing asbestos MUST be assessed by the Project Engineer using the "Made Ground decision process for Geotechnical Laboratory testing" and "Laboratory testing – Asbestos Risk Assessment". This can be undertaken by project, borehole or sample depth as appropriate.

Where the risk assessment indicates there is a risk of asbestos being present then the Project Supervisor/Engineer shall request further guidance from the Client as to how to proceed; by either

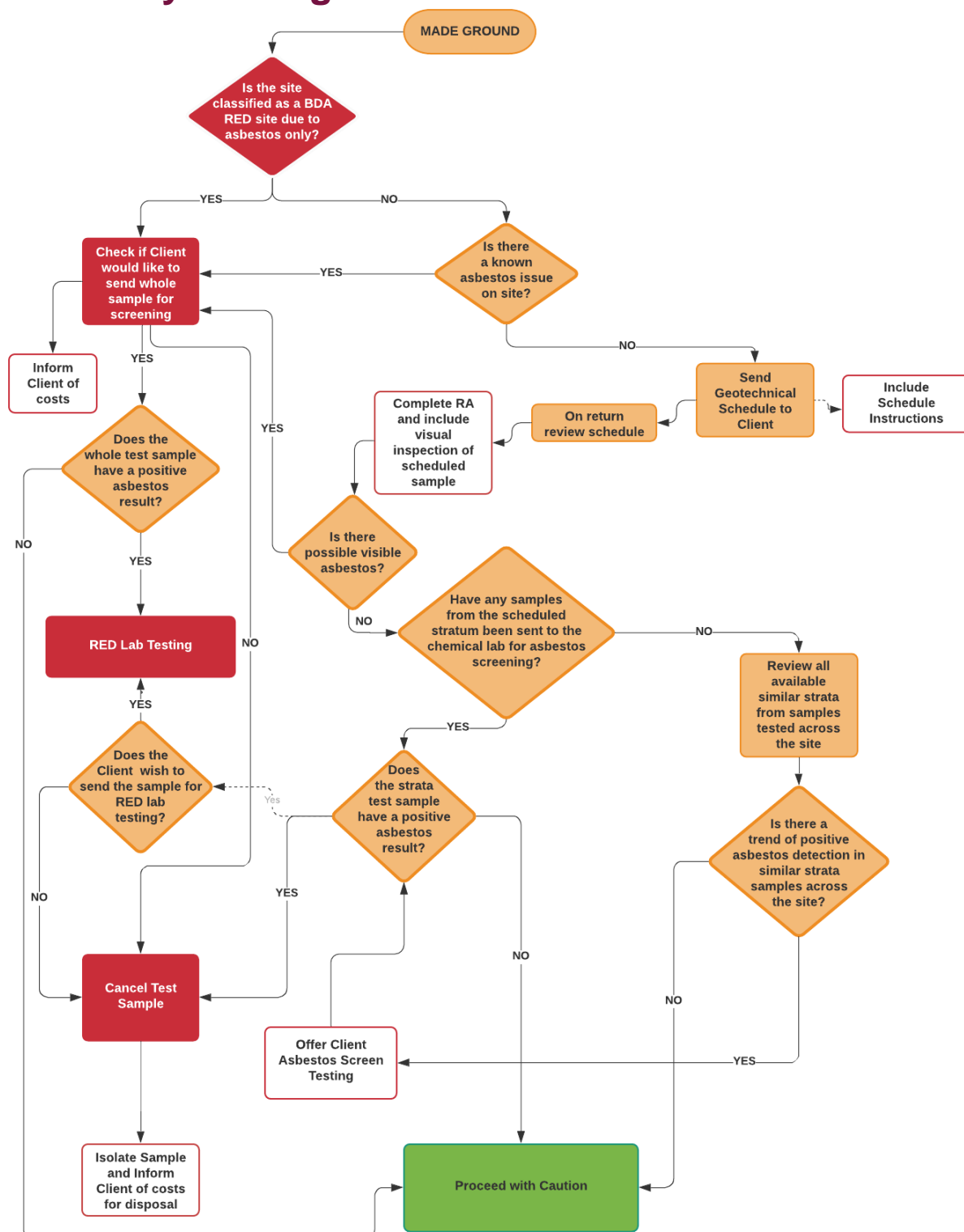
- Cancelling the test/s.
- Sending the sample/s for external asbestos screening.
- Sending the sample/s to a 'Red Laboratory' for geotechnical testing.

When the risk assessment indicates there is minimal risk of asbestos being present then the geotechnical testing should proceed with caution.

- If any of the Laboratory staff identify or suspect potential asbestos this should immediately be reported to the Laboratory Manager and all further works on associated samples should cease immediately pending review.
 - Such samples should be resealed and placed separately and the Project Supervisor/Engineer shall request further guidance from the Client to get them to determine the way as to how to proceed; by either
 - Cancelling the test/s.
 - Sending the sample/s for external asbestos screening.
 - Sending the sample/s to a 'Red Laboratory' for geotechnical testing.



8.1 Made Ground decision process for Geotechnical Laboratory Testing



1983

1988

1993

2014

2019

8.2 Laboratory Testing – Asbestos Risk Assessment

Notes: ACM - Asbestos containing material (see Asbestos Awareness training notes)					
Work Stage	Initial Tasks	Secondary Tasks	Laboratory Action		
Stage 1 - Identify samples and analysis that may release asbestos fibres	1. Visual inspection of sample types (additional information from engineer / client may be available to help)	A. NATURAL GROUND	LOW RISK, proceed with analysis but undertake Stage 3 observations		
		B. NATURAL GROUND / REWORKED NATURAL GROUND - Disturbed cohesive samples for Index Tests			
		C. MADE GROUND - Cohesive samples containing anthropogenic materials (inc brick, concrete, metal, plastic)		MODERATE RISK due to possible asbestos presence. Tests less likely to release fibres, unless dried. Undertake Stage 2 inspection.	
		D. MADE GROUND - Granular including anthropogenic materials. Including recycled aggregates			HIGH RISK due to possible asbestos presence and potential release of fibres due to likely analysis
Stage 2 - Initial Sample Visual Inspection - NOT A RED SITE Undertaken by trained Visual Asbestos Screening personnel	1. No ACM or potential fibres observed	A. Samples HAVE NOT been scheduled for asbestos screening FROM STRATUM	Review data from all samples, if trend to NEGATIVE asbestos, PROCEED WITH CAUTION	Review data from all samples, if trend to POSITIVE asbestos, offer client asbestos screening test	Client DECLINES whole sample screening. CANCEL THE TEST
		B. Samples HAVE been scheduled for asbestos screening	If results are NEGATIVE, PROCEED WITH CAUTION	IF SCREENING IS POSITIVE, offer Client option of SENDING TO A RED LAB	Client DECLINES red Lab testing. CANCEL THE TEST
	2. Suspected ACMs or fibres observed in the sample	A. Contact Client for instruction to schedule whole sample screening	Client approves whole samples screening and result is NEGATIVE. PROCEED WITH CAUTION	Client approves whole sample screen and result is POSITIVE for asbestos, SEND TO RED LAB	Client DECLINES whole sample screening. CANCEL THE TEST

Work Stage	Initial Tasks	Secondary Tasks	Laboratory Action		
Stage 3 - Ongoing Visual Inspection	1. All laboratory staff have undertaken Asbestos Awareness training	A. Analysts should always be vigilant for the potential for previously unidentified asbestos to be encountered e.g. during sample preparation etc.		If suspected ACMs or asbestos fibres are observed, STOP WORK and contact LABORATORY TESTING MANAGER for advice and referral to Visual Asbestos Screening personnel. IMPLEMENT STAGE 2 PROCEDURES	
	2. Samples that proceed to laboratory analysis should have on-going inspection				

9. Disposal Procedures

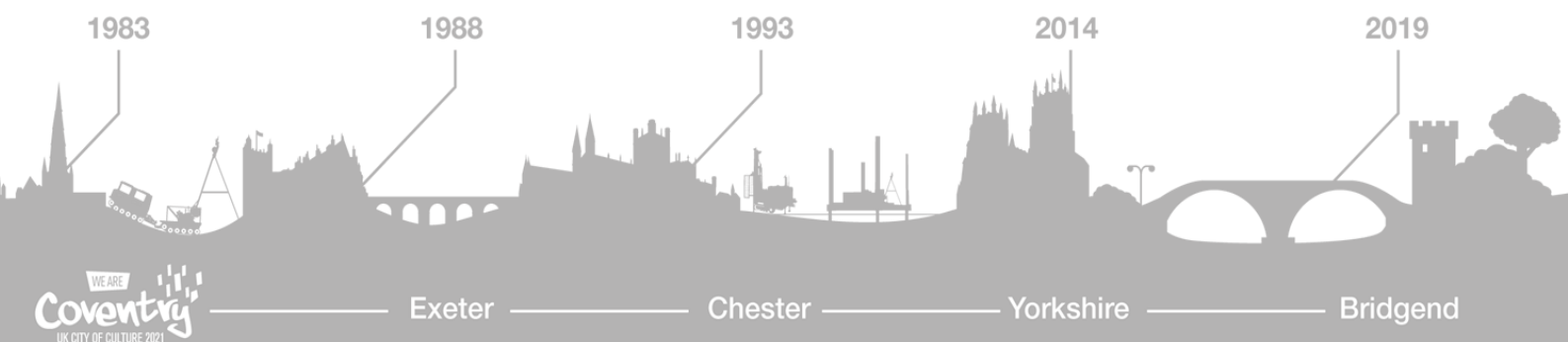
For disposal purposes materials containing asbestos should be placed in UN-approved packaging with a CDG (Carriage of Dangerous Goods) hazard label and asbestos code information visible.

Double-wrap and label asbestos waste. Standard practice is to use a red inner bag with asbestos warnings, and a clear outer bag with the CDG label affixed.

Arrangements should then be made for the samples to be taken by a licensed waste carrier and disposed of at a suitable facility and as hazardous waste.

Hazardous waste consignment notes should be used with file copies kept by the appointed waste person for that waste stream. Documentation should comply with current legal waste requirements and indicate where the waste was taken from, by whom and to where it was taken for disposal, with a note of their waste license number and preferably a copy of their waste license.

Hazardous waste consignment notes must be retained by the Company for 3 years from the date of disposal.



Employment Opportunity Policy

I. General Commitment to Equal Opportunities

I.1 Geotechnics Limited is an equal opportunities employer. It is fully committed to promoting equality of opportunity in all it does as an employer and as a provider of services.

I.2 Geotechnics Limited recognises that individuals and groups can be unfairly discriminated against and acknowledges its responsibilities to eliminate discrimination, both direct and indirect, in particular any form of discrimination that is unlawful.

I.3 Geotechnics Limited seeks to operate within a framework of fairness, openness, integrity and accountability and to extend its commitment to equality of opportunity via its expectations of those who provide services for the company.

I.4 Geotechnics Limited key values and principles are to ensure that:

- All employment and service delivery policies and practices aim to reflect a positive valuing of human difference and diversity.
- All Geotechnics Limited staff/workers are aware of and understand the company's commitment to equality of opportunity and their responsibilities in relation to this. Training and guidance for staff/workers will reinforce this, especially training for those involved in recruitment and selection decisions.
- Geotechnics Limited workforce has the knowledge, skills and abilities to provide high quality services within a clear framework of anti-discriminatory, including anti- sectarian, practice.
- Geotechnics Limited services are responsive, accessible, sensitive and appropriate to those who need and may benefit from them.
- All employees/workers have the right to be treated with consideration, respect and dignity.
- The participation of Geotechnics Limited staff/workers in the development and implementation of Geotechnics Limited' policies, procedures and practices is encouraged and facilitated with a clear and consistent focus at all times on achieving equality of opportunity.
- Geotechnics Limited' goal is to develop a culture in which any form of discrimination or harassment is known to be unacceptable and where individuals are confident enough to bring complaints without fear of ridicule or reprisal.

I.5 Geotechnics Limited will ensure that all policies and practices are in line with relevant employment and service delivery related legislative, regulatory and good practice requirements. This includes the:

Employment Opportunity Policy

- Equality and Human Rights Commission Equality Act 2010 Statutory Code of Practice
- Equality Act 2010
- Equal Pay Act 1970
- Rehabilitation of Offenders Act 1974
- Human Rights Act 1998
- Immigration & Asylum Act 1999
- Part Time Workers (Prevention of Less Favourable Treatment) Regulations 2000
- Fixed Term Employees (Prevention of Less Favourable Treatment) Regulations 2002

1.6 This is not an exhaustive list and Geotechnics Limited recognises that there are many groups who face discrimination and victimisation not all of whom are afforded the protection of specific legislation or regulation. The company also recognises that some individuals may face discrimination on more than one front e.g. there could be discrimination on basis of both ethnic origin and gender. Geotechnics Limited will take appropriate action to combat this.

1.7 Geotechnics Limited will seek to ensure that all employment policies and practices are in line with relevant national and European legislative changes as and when these occur.

2. Equality in Employment

2.1 Geotechnics Limited aims to integrate equality of opportunity into all of its employment activities. Geotechnics Limited seek to recruit and retain a workforce that is diverse and representative of the community and those whom the company works with or provides a service to.

Recruitment and Selection Practices

2.2 No prospective Geotechnics Limited employee/worker or existing Geotechnics Limited employee/worker will be subject to any form of discrimination on the grounds of:

- Gender
- Age
- Marital status or civil partnership
- Race
- Colour
- Nationality
- Ethnic or national origin
- Religious beliefs (or none)
- Disability
- Sexual orientation
- Gender re-assignment
- Pregnancy or maternity

Employment Opportunity Policy

- Political beliefs or opinion
- Trade union membership/non-membership and involvement in trade union

activities This list is not exhaustive.

- 2.3 With regard to recruitment and selection of staff/workers, job and person specifications are prepared for every vacancy, details of vacancies are made available via internal and/or external advertising (including Job Centres, Careers Offices), or existing Geotechnics Limited staff/workers may be transferred. Applicants are short listed based upon the information they have put on their application which will then be assessed against the criteria for the role and selection decisions are made on the basis of merit.

We will not ask candidates questions about their health before including them in a shortlist or offering them a job, except for the purposes of establishing whether or not they will be able to complete one of the stages of the recruitment process, for example an interview and whether we will need to make reasonable adjustments for a candidate to complete one of the stages of the recruitment process

- 2.4 Geotechnics Limited will monitor job applications for diversity and equal opportunities.
- 2.5 The Geotechnics Limited recruitment and selection policy will be applied consistently.

Training and Development Opportunities

- 2.6 Geotechnics Limited is committed to promoting the professional development of all staff/workers. Induction, training and promotion opportunities will operate in a fair and non-discriminatory way so as to maximise the potential of all employees/workers.

Harassment/Bullying

- 2.7 Geotechnics Limited is committed to creating working environments in which every employee/worker is treated with dignity, courtesy and respect and each person's individuality and self worth within the workplace is maintained.
- 2.8 Geotechnics Limited makes clear to all employees/workers that harassment and bullying will not be tolerated. Any employee/worker who feels he/she is being harassed or bullied can complain without fear of being victimised or isolated.
- 2.9 Please see Section 3 for further details of the company's bullying and harassment policy.

Disciplinary and Grievance Procedures

- 2.10 Geotechnics Limited has developed procedures for handling disciplinary matters and grievances (see procedures annexed to Conditions of Employment) which apply to all staff irrespective of their status within the organisation. The intention behind these procedures is to resolve and remedy problems quickly and before they become more serious. Geotechnics Limited is committed to implementing disciplinary and grievance procedures fairly and consistently.

Employment Opportunity Policy

Genuine Occupational Requirements

- 2.11 There may be posts within Geotechnics Limited for which a genuine occupational requirement exists and which precludes some individuals from being considered. Any decision to exclude individuals or groups from consideration on this basis will be shown to be justifiable.

Positive Action

- 2.12 Subject to appointment decisions being made on merit, Geotechnics Limited reserves the right to take action to achieve and maintain at all levels a workforce that reflects a commitment to promoting equality of opportunity. If necessary Geotechnics Limited will use, where appropriate, powers available under the relevant legislation to take positive action. This could include:

- The development of strategies to ensure that positive, encouraging messages are given to underrepresented groups to apply for vacant posts
- Incorporation of diversity awareness into management and staff/workers training/development programmes and specifically into recruitment and selection training
- Action to ensure that employees have equal access to training, development and career opportunities
- Action to remedy the under representation of particular groups at certain levels within the workforce – for example, by offering targeted training, development and career opportunities if appropriate.

Social Events

- 2.13 This policy will also apply to social events which are work-related. Employees/workers will therefore be expected to conduct themselves in a manner that is consistent with this policy. Whilst the social event(s) may or may not occur outside working hours, employees'/workers' actions and behaviour will be regarded as having been carried out in the course of their employment.

3. Bullying and Harassment

- 3.1 "Harassment", in general terms, is unwanted conduct which has the purpose or effect of violating the dignity of employees/workers in the workplace. It may be related to age, sex, race, colour, disability, religion, nationality, marital status, sexual orientation, ethnicity, sectarianism, political beliefs or any personal characteristic of the individual. It may also be a civil or criminal offence and it may contravene health and safety legislation.

- 3.2 "Bullying" may be characterised as offensive, intimidating, malicious or insulting behaviour, which undermines the confidence and self-esteem of the recipient who is made to feel upset, threatened, humiliated, vulnerable and victimised.

Employment Opportunity Policy

- 3.3 Defining the types of behaviour that could be deemed as harassment can be problematic as conduct which may cause distress, annoyance and embarrassment to one employee/worker, may be totally acceptable to another. Equally, the “harasser” may not realise that their behaviour / actions amount to harassment. It is not a defence for a person to carry out such unacceptable conduct on the premise that no offence was intended.
- 3.4 Employees/workers must therefore be sensitive about the feelings of other employees/workers. An employee/worker who was not the subject of a joke / comment may take offence and this may amount to harassment.
- 3.5 The following provides a list of behaviour / actions that may constitute harassment (this list is not exhaustive):
- Repeated and unwanted verbal or sexual advances
 - Explicit derogatory statements
 - Discriminatory remarks, ageist jokes or homophobic comments (even if no offence is intended)
 - Offensive language or sectarian songs
 - Gossip and slander
 - Use of pin-ups, pornographic material, graffiti, flags, bunting or emblems within the workplace
 - Unwelcome sexual attention or physical contact
 - Threatened or actual physical violence
 - Speculation about background, education, private life, parentage
 - Setting unattainable targets
 - Undervaluing work done
 - Belittling someone’s opinion or humiliating someone in front of others
 - Isolation / exclusion from social activities
 - Coercion, including pressure to participate in political/religious groups
- 3.6 Not all harassment occurs face-to-face. Harassment by email, letter, memo and fax is viewed just as seriously.

Role of Directors and Managers

- 3.7 All Directors and Managers have a duty to recognise the possibility for harassment to occur in the workplace, and take preventative measures or, if identified, take prompt action to stop immediately any such harassment.
- 3.8 All Directors and Managers should ensure that staff/workers are aware of what is acceptable and unacceptable conduct in the workplace, and should themselves set a good example.
- 3.9 Directors and Managers should ensure that the standard of conduct or behaviour, which could be perceived as potentially offensive, distressing or embarrassing, is corrected by counselling, training and / or disciplinary action as appropriate.

Role of Employees/Workers

Employment Opportunity Policy

- 3.10 Each employee/worker is responsible for ensuring that they do not behave in any way which may be deemed to be harassment.
- 3.11 Each employee/worker is expected to be vigilant within the workplace and should report any acts of harassment, bullying or discrimination that may be witnessed.
- 3.12 All reports and allegations will be treated sensitively and maintain confidentiality to the maximum extent possible. Employees/workers have a duty to challenge behaviour, which is contrary to this policy, and to support individuals who are subject to harassment.

Personal Relationships at Work

- 3.13 If personal relationships develop between members of staff/workers working within the company, you are required to inform your line manager. The purpose of requiring this information is to ensure that our rules on equal opportunities, discrimination, confidentiality, bullying and harassment, and any other such policies are not infringed.

4 Complaints

- 4.1 Any complaints should be made informally to your line manager in the first instance (or to a more senior manager if the complaint is about your line manager).
- 4.2 If the complaint cannot be resolved in this way or the matter is too serious to be dealt with informally, it should be raised formally by using the company's grievance procedure (see procedures annexed to Conditions of Employment).
- 4.3 All complaints will be treated seriously and investigated fully.
- 4.4 You have a right not to be victimised for making a complaint in good faith, even if the complaint is not upheld. However, making a complaint that you know to be untrue may lead to disciplinary action being taken against you.
- 4.5 Acts of discrimination, harassment, bullying or victimisation against employees/workers or customers are disciplinary offences and will be dealt with under the Company's disciplinary procedure. Conduct of this type will often be gross misconduct which can lead to dismissal without notice.



John Booth
Managing Director

Issue date: 14th Feb 2021
Review date: 14th Feb 2022

GEOTECHNICS
geotechnical and geoenvironmental specialists



Data Protection Policy

Incorporating GDPR

Feb 2021

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1. INTRODUCTION

1.1 Purpose and Scope of this Policy

Geotechnics Limited is committed to a policy of protecting the rights and privacy of individuals, including staff and others, in accordance with the General Data Protection Regulation (GDPR) May 2018.

The new regulatory environment demands higher transparency and accountability in how personal data is collected, used and managed. It also accords new and stronger rights for individuals to understand and control that use.

The GDPR contains provisions that the Company will need to be aware of as data controllers, including provisions intended to enhance the protection of individual's personal data.

We must ensure that our Company privacy notices are written in a clear, plain way that everyone will understand.

Geotechnics needs to process certain information about its staff, Clients and other individuals with whom it has a relationship for various purposes such as, but not limited to:

1. The recruitment and payment of staff
2. The administration of staff training
3. Project contracts and frameworks with Clients
4. Inductions and briefings for staff and anyone working within our offices or on our project sites
5. External accreditations, memberships and certifications
6. Staff records e.g. calendar movements, annual leave, sickness absence, grievance records, disciplinary records
7. General accounting
8. Complying with legal obligations

To comply with various legal obligations, including the obligations imposed on it by the General Data Protection Regulation (GDPR) Geotechnics must ensure that all this information about individuals is collected and used fairly, stored safely and securely, and not disclosed to any third party unlawfully.

1.2 Compliance

This policy applies to all staff of Geotechnics. Any breach of this policy or of the Regulation itself will be considered an offence and the Company's disciplinary procedures will be invoked.

As a matter of best practice, other organisations and individuals working with Geotechnics and who have access to personal information, will be expected to read and comply with this policy. It is expected that departments who are responsible for dealing

with external bodies will take the responsibility for ensuring that such bodies sign a contract which among other things will include an agreement to abide by this policy.

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments to the GDPR and other relevant legislation.

1.3 What is the General Data Protection Regulation (GDPR)?

This piece of legislation comes in to force on the 25th May 2018. The GDPR regulates the processing of personal data, and protects the rights and privacy of all living individuals (including children), for example by giving all individuals who are the subject of personal data a general right of access to the personal data which relates to them. Individuals can exercise the right to gain access to their information by means of a 'subject access request'. Personal data is information relating to an individual and may be in hard or soft copy (paper/manual files; electronic records; photographs; CCTV images), and may include facts or opinions about a person.

For more detailed information on these Regulations see the Data Protection Data Sharing Code of Practice (DPCoP) from the Information Commissioner's Office (ICO). Please follow this link to the ICO's website (www.ico.gov.uk).

1.4 Responsibilities under the GDPR

Geotechnics will be the 'data controller' under the terms of the legislation – this means it is ultimately responsible for controlling the use and processing of the personal data. The Company appoints a Data Protection Officer (DPO), currently the Managing Director who is available to address any concerns regarding the data held by the Company and how it is processed, held and used. Geotechnics also has a nominated Manager who oversees this policy.

Senior Management is responsible for all day-to-day data protection matters, and will be responsible for ensuring that all members of staff and relevant individuals abide by this policy, and for developing and encouraging good information handling within the Company.

Senior Management is also responsible for ensuring that the Company's notification is kept accurate. Details of the Company's notification can be found on the Office of the Information Commissioner's website. Our data registration number is: Z4575336. Compliance with the legislation is the personal responsibility of all members of the Company who process personal information.

Individuals who provide personal data to the Company are responsible for ensuring that the information is accurate and up-to-date.

1.5 Data Protection Principles

The legislation places a responsibility on every data controller to process any personal data in accordance with the eight principles. More detailed guidance on how to comply

with these principles can be found in the DPCoP. Please follow this link to the ICO's website (www.ico.gov.uk).

In order to comply with its obligations, Geotechnics undertakes to adhere to the eight principles:

1) Process personal data fairly and lawfully.

Geotechnics will make all reasonable efforts to ensure that individuals who are the focus of the personal data (data subjects) are informed of the identity of the data controller, the purposes of the processing, any disclosures to third parties that are envisaged; given an indication of the period for which the data will be kept, and any other information which may be relevant.

2) Process the data for the specific and lawful purpose for which it collected that data and not further process the data in a manner incompatible with this purpose.

Geotechnics will ensure that the reason for which it collected the data originally is the only reason for which it processes those data, unless the individual is informed of any additional processing before it takes place.

3) Ensure that the data is adequate, relevant and not excessive in relation to the purpose for which it is processed.

Geotechnics will not seek to collect any personal data which is not strictly necessary for the purpose for which it was obtained. Forms for collecting data will always be drafted with this mind. If any irrelevant data are given by individuals, they will be destroyed immediately.

4) Keep personal data accurate and, where necessary, up to date.

Geotechnics will review and update all data on a regular basis. It is the responsibility of the individuals giving their personal data to ensure that this is accurate, and each individual should notify the Company if, for example, a change in circumstances mean that the data needs to be updated. It is the responsibility of the Company to ensure that any notification regarding the change is noted and acted on.

5) Only keep personal data for as long as is necessary.

Geotechnics undertakes not to retain personal data for longer than is necessary to ensure compliance with the legislation, and any other statutory requirements. This means Geotechnics will undertake a regular review of the information held and implement a weeding process.

Geotechnics will dispose of any personal data in a way that protects the rights and privacy of the individual concerned (e.g. secure electronic deletion, shredding and disposal of hard copy files as confidential waste). A log will be kept of the records destroyed.

6) Process personal data in accordance with the rights of the data subject under the legislation.

Under GDPR, you have rights as an individual which you can exercise in relation to the information we hold about you. These are;

- a right of access to a copy of the information comprised in their personal data;
 - a right to object to processing that is likely to cause or is causing damage or distress;
 - a right to prevent processing for direct marketing;
 - a right to object to decisions being taken by automated means;
 - a right in certain circumstances to have inaccurate personal data rectified, blocked, erased or destroyed; and
 - a right to claim compensation for damages caused by a breach of the Act.
- You can read more about these rights [here](#).

Geotechnics will only process personal data in accordance with individuals' rights.

7) Put appropriate technical and organisational measures in place against unauthorised or unlawful processing of personal data, and against accidental loss or destruction of data.

All members of staff are responsible for ensuring that any personal data which they hold is kept securely and not disclosed to any unauthorised third parties.

Geotechnics will ensure that all personal data is accessible only to those who have a valid reason for using it.

Geotechnics will have in place appropriate security measures e.g. ensuring that hard copy personal data is kept in lockable filing cabinets/cupboards with controlled access (with the keys then held securely in a key cabinet with controlled access):

- keeping all personal data in a lockable cabinet with key-controlled access
- password protecting personal data held electronically
- archiving personal data which are then kept securely (lockable cabinet)
- placing any PCs or terminals, CCTV camera screens etc. that show personal data so that they are not visible except to authorised staff
- ensuring that PC screens are not left unattended without a password protected screen-saver being used

In addition, Geotechnics will put in place appropriate measures for the deletion of personal data - manual records will be shredded or disposed of as 'confidential waste' and appropriate contract terms will be put in place with any third parties undertaking this work. Hard drives of redundant PCs will be wiped clean before disposal or if that is not possible, destroyed physically. A log will be kept of the records destroyed.

This policy also applies to staff and who process personal data 'off-site', e.g. when working on a project site, or at home, and in circumstances additional care must be taken regarding the security of the data.

- 8) Ensure that no personal data is transferred to a country or a territory outside the European Economic Area (EEA) unless that country or territory ensures adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.**

Geotechnics will not transfer data to such territories without the explicit consent of the individual.

This also applies to publishing information on the Internet - because transfer of data can include placing data on a website that can be accessed from outside the EEA - so Geotechnics will always seek the consent of individuals before placing any personal data (including photographs) on its website.

If the College collects personal data in any form via its website, it will provide a clear and detailed privacy statement prominently on the website, and wherever else personal data is collected.

1.6 Consent as a basis for processing

Although it is not always necessary to gain consent from individuals before processing their data, it is often the best way to ensure that data is collected and processed in an open and transparent manner.

Consent is especially important when Geotechnics is processing any sensitive data, as defined by the legislation.

Geotechnics understands consent to mean that the individual has been fully informed of the intended processing and has signified their agreement (e.g. via the contract of employment) whilst being of a sound mind and without having any undue influence exerted upon them. Consent obtained on the basis of misleading information will not be a valid basis for processing. Consent cannot be inferred from the non-response to a communication.

“Personal Details

- *For the purposes of the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679 you consent to the Company holding and processing personal data including sensitive personal data of which you are the subject, details of which are specified in the Company’s data protection policy.*
- *This will include marketing images and CCTV.”*

Geotechnics will ensure that any forms used to gather data on an individual will contain a statement (fair collection statement) explaining the use of that data, how the data may be disclosed and also indicate whether or not the individual needs to consent to the processing.

Geotechnics will ensure that if the individual does not give his/her consent for the processing, and there is no other lawful basis on which to process the data, then steps will be taken to ensure that processing of that data does not take place.

1.7 Subject Access Rights (SARs)

Individuals have a right to access any personal data relating to them which are held by the Company. Any individual wishing to exercise this right should apply in writing to the Managing Director. Any member of staff receiving a SAR should forward this to the Managing Director.

The Company reserves the right to charge a fee for data subject access requests (currently £50).

Under the terms of the legislation, any such requests must be complied with within 40 days.

For detailed guidance on responding to SARs, see the CoP.

1.8 Disclosure of Data

Only disclosures which have been notified under the Company's DP notification must be made and therefore staff and students should exercise caution when asked to disclose personal data held on another individual or third party.

Geotechnics undertakes not to disclose personal data to unauthorised third parties, including family members, friends, government bodies and in some circumstances, the police.

Legitimate disclosures may occur in the following instances:

- the individual has given their consent to the disclosure
- the disclosure has been notified to the Managing Director and is in the legitimate interests of the Company
- the disclosure is required for the performance of a contract

There are other instances when the legislation permits disclosure without the consent of the individual.

For detailed guidance on disclosures, see the Code of Practice (CoP).

In no circumstances will Geotechnics sell any of its databases to a third party.

1.9 How we handle data

1.9.1 Published data

Geotechnics publishes various items which will include some personal data, e.g.

- internal telephone directory
- event information
- photos and information in marketing materials

It may be that in some circumstances an individual wishes their data processed for such reasons to be kept confidential, or restricted access only. Therefore it is

Geotechnics policy to offer an opportunity to opt-out of the publication of such when collecting the information.

1.9.2 Email

It is the policy of Geotechnics to ensure that senders and recipients of email are made aware that under the DPA, and Freedom of Information Legislation, the contents of email may have to be disclosed in response to a request for information. One means by which this will be communicated will be by a disclaimer on the Company's email.

Under the Regulation of Investigatory Powers Act 2000, Lawful Business Practice Regulations, any email sent to or from the College may be accessed by someone other than the recipient for system management and security purposes.

1.9.3 CCTV

There are some CCTV systems operating within Geotechnics for the purpose of protecting College members and property. Geotechnics will only process personal data obtained by the CCTV system in a manner which ensures compliance with the legislation.

1.9.4 E-newsletter

We use a third party provider, MailChimp, to deliver our e-newsletters. We gather statistics around email opening and clicks using industry standard technologies including clear gifs to help us monitor and improve our e-newsletter. For more information, please see [MailChimp's GDPR policy](#). Their general Privacy Policy can also be seen [here](#).

1.10 What information do we collect?

We monitor user activity to enhance content provided on our website. We use Google Analytics, a web analytics service provided by Google Inc. ('Google'). Google Analytics uses 'cookies' and JavaScript code to help analyse user activity on websites. The information generated about use of the website (including anonymised IP address) will be transmitted to and stored on Google servers in the United States.

Google will use this information to produce user activity reports for this website. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf.

Google will not associate an IP address with any other data previously held. An individual may refuse the use of cookies by selecting the appropriate settings on their internet browser. Please note that if cookies are disabled, users may not be able to use the full functionality of our website. By using the website, users consent to the processing of data about them by Google in the manner and for the purposes set out above.

Read [Google's Privacy Policy](#) and [Google's Terms of Service](#) for detailed information.

The site, from time to time, links to Google forms for data collection. This data is also processed in the US and is covered by the aforementioned Policy and Terms of Service documents.

We collect two kinds of electronic information direct from visitors to the website; feedback and email subscription details.

2.0 RISK ASSESSMENT

It is essential that the Data Protection Policy is subject to a comprehensive assessment, to ensure the mitigation measures are effective and fulfils its reason for existence. Geotechnics Limited has undertaken a comprehensive risk assessment, in consultation with all members of Senior Management and Regional Offices.

This Risk Assessment is held securely on Geotechnics' systems and is available to view on request.

3.0 UPDATING AND REVIEW

This policy will be updated as necessary to reflect best practice or future amendments made to the General Data Protection Regulation (GDPR) May 2018 and Data Protection Act 1998.

Please follow this link to the ICO's website (www.ico.gov.uk) which provides further detailed guidance on a range of topics including individuals' rights, exemptions from the Act, dealing with subject access requests, how to handle requests from third parties for personal data to be disclosed etc.

This policy document comes into effect on:

14th Feb 2021

Review Date:

Continuous review by the senior management team

Written policy renewal date:

14th Feb 2022

Managing Director Signed:



JOHN BOOTH (Managing Director)

Date: 14th Feb 2021

Labour Standards Policy Statement

Geotechnics Limited acknowledges its obligations towards its clients employees and the communities in which it works. This policy relates to labour standards which are appropriate in nature and scale to Geotechnics Limited, operating as an SME.

This policy is relevant to the organisation itself, its contractors, sub-contractors, suppliers and other parties engaged through the supply chain.

Continual Improvement

Geotechnics Limited commits to review this policy periodically, including by Senior Management, in order to ensure continuous improvement, taking into consideration changes in legislation, any other requirements to which Geotechnics Limited subscribes, and in order to ensure the adequacy, suitability and continuing effectiveness of the policy.

Minimum Labour Standards

Geotechnics Limited has identified the following compelling reasons to establish a comprehensive system of Minimum Labour Standards to guide its business operations.

- 1. ETHICAL RESPONSIBILITIES** - Geotechnics Limited acknowledges its obligations towards its customers, employees and the communities in which it works arising from its business operations and wishes to work and trade in an ethical fashion.
- 2. THREAT TO SECURITY OF SUPPLY** – Geotechnics Limited has identified that labour standards abuses in supply chains can pose a risk to the security of supply. Any supply chain partners perpetrating abuses face legal enforcement action which may damage business and interfere with their ability to continue to supply.
- 3. ADVERSE PUBLICITY AND DAMAGE TO GEOTECHNICS LIMITED'S REPUTATION** – adverse publicity from the discovery of labour standards abuses in Geotechnics Limited's supply chain presents reputational and structural risks as follows – (a) income – customers may choose to purchase supplies and services from other providers (b) staff recruitment and retention – staff may choose not to work for a Company associated with any labour standards abuses and this may lead to poor morale in the work place and difficulty in recruitment (c) loss of trust – both with customers and suppliers and also within the wider community.
- 4. REDUCED QUALITY OF GOODS AND SERVICES** – Geotechnics Limited recognises that there is commonly a link between poor labour standards and poor quality of goods and services. To this end, it is in the interest of Geotechnics Limited to ensure its suppliers reach minimum labour standards targets at all times.

To help it identify a defined set of minimum labour standards, Geotechnics Limited has particularly referred to the following resources:-

Social Accountability International's SA8000 document and the UN's Universal Declaration of Human Rights

Geotechnics Limited recognises that there is commonly a link between poor labour standards and poor quality of goods and services



John Booth

Managing Director

Version: 4.0

Issue date: 14th Feb 2021

Review date: 14th Feb 2022

Changes since last issue:

- Policy reference added



Labour Standards Policy Statement

These minimum labour standards are:-

Geotechnics Limited recognises that there is commonly a link between poor labour standards and poor quality of goods and services

1. Child Labour – Geotechnics Limited does not engage in or support the use of child labour. If Geotechnics Limited engages any young workers for example on work experience, it will ensure that a suitable risk assessment is carried out and that young persons are not exposed to any hazardous conditions, or in any case work more than 8 hours per day,
2. Forced & Compulsory Labour – Geotechnics Limited shall not engage in or support the use of forced or compulsory labour, or bonded or involuntary prison labour. Employees are free to leave upon reasonable notice,
3. Health & Safety – Geotechnics Limited shall provide a safe and healthy workplace environment and shall take effective steps to prevent potential accidents and injury to employees' health by minimizing, so far as is reasonably practicable, and in co-operation with its employees, the causes of hazards inherent in the workplace. All employees will receive safety and job specific instructions during the course of their employment with Geotechnics Limited. Employees shall have access to clean sanitary facilities and drinking water. Responsibility for implementing the Health & Safety element of this policy is assigned to the SHEQ Manager,
4. Freedom of Association – the freedom of association is respected and Geotechnics Limited will comply with UK labour relations legislation in this regard,
5. Discrimination – Geotechnics Limited shall not engage in or support any discriminatory practices in hiring, remuneration, access to training, promotion, termination or retirement based on race, national or social origin, caste, religion, gender, sexual orientation, political affiliations, age or other conditions that could give rise to discrimination. Geotechnics Limited has an Equal Opportunities Policy which is shown and provided to all new employees at induction,
6. Disciplinary Practices – Geotechnics Limited shall treat all employees with dignity and respect. Geotechnics Limited shall not engage in or tolerate the use of corporal punishment, mental or physical coercion or verbal abuse of personnel. No harsh or inhumane treatment is allowed,
7. Working Hours – Geotechnics Limited shall comply with applicable laws and industry standards on working hours and holiday entitlements. Geotechnics Limited ensures all employees have the legal right to be employed in the UK,
8. Remuneration - Geotechnics Limited shall comply with national laws and regulations with regard to wages and benefits. All work related activities are carried out on the basis of a recognised employment relationship established according to national law and practice.

Geotechnics Limited also commits to :-

- Comply with relevant legal and other requirements to which it subscribes,
- Make available sufficient resources for the implementation of this policy.

