



Quattro (UK) Limited

Company Policies

Dated:

10 July 2021

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Social responsibility and business ethics policy

Quattro (UK) Ltd is committed to carrying out our business in an ethical manner throughout the entire company. We do this by encouraging all of our employees to carry out their work with the following principles in mind:

- **Respect for others-** Treat people as you want to be treated.
- **Integrity and honesty-** Tell the truth and avoid any wrongdoing to the best of your ability.
- **Justice-** Make sure you're objective and fair and don't disadvantage others.
- **Lawfulness-** Know and follow the law – always.
- **Competence and accountability-** Work hard and be responsible for your work.
- **Teamwork-** Collaborate and ask for help.

Quattro (UK) Limited has highlighted and controls the following key areas of social responsibility and business ethics, with additional information and resource available when necessary:

- UK Competition Law – credit circles and Trade Associations
- Anti-corruption, bribery, gifts and hospitality
- Investigation of potential ethical violations
- Modern slavery
- GDPR
- Equal opportunities
- Training needs and plans
- Dealing with staff issues and dilemmas

We require all employees of Quattro (UK) Limited, all third parties that represent the Company directly or indirectly, such as our supply chain, consultants, representatives, distributors, joint venture partners and any other third parties that supply goods or services to the Company, to meet our standards and ensure compliance with all matters relating to social responsibility and business ethics.

Whilst all employees are responsible for their own adherence to the policy, managers are also required to consider whether the actions of their staff and representatives are undertaken in accordance with the company requirements.

We are committed to ensuring compliance with laws to which our activities may be subject, including in particular Anti-corruption and bribery legislation, UK & EU Competition Law, Modern slavery, GDPR, Tax avoidance/evasion & Equal opportunities/anti-discrimination. In this respect we have emphasised these below, highlighting the appropriate definition of the requirement:

Anti-corruption legislation:

The Bribery Act 2010 is an Act of the Parliament of the United Kingdom that covers the criminal law relating to bribery. We are committed to complying wholly and without exception with this legislation.

Competition:

Both UK and EU competition law prohibit agreements, arrangements and concerted business practices which appreciably prevent, restrict or distort competition (or where this is the intended result) and which affect or may affect trade within the UK or the EU respectively. We are committed to complying wholly and without exception with this legislation.

Modern slavery:

The Modern Slavery Act 2015 is an Act of the Parliament of the United Kingdom. It is designed to combat modern slavery in the UK and consolidates previous offences relating to trafficking and slavery. The act extends to England and Wales. We are committed to complying wholly and without exception with this legislation. We will not enter into or will terminate business dealings with any supplier, contractor or other third party whom we have reason to believe is involved in slavery or human trafficking.

GDPR:

The Data Protection Act 2018 is a United Kingdom Act of Parliament which updates data protection laws in the UK. It is a national law which complements the European Union's General Data Protection Regulation and updates the Data Protection Act 1998. We ensure that any information held is:

- used fairly, lawfully and transparently
- used for specified, explicit purposes
- used in a way that is adequate, relevant and limited to only what is necessary
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary
- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage

We do not maintain any financial information in terms of payment methods/credit cards etc.

Tax avoidance/evasion:

Whilst UK law differentiates between avoidance and evasion, neither practice is acceptable within Quattro (UK) Limited or within its supply chain. We are committed to complying wholly and without exception with this legislation.

Equal opportunities/anti-discrimination/harassment:

The right to be treated without discrimination, especially on the grounds of one's sex, race, or age. We are committed to complying wholly and without exception with this legislation.

Denying any employee or prospective employee their right to equal opportunity in the workplace is tantamount to discrimination, which is considered unlawful under the Equality Act 2010. The Employer recognises its legal obligations including those under the Race Relations Act, the Sex Discrimination Act, the Civil Partnership Act, the Equal Pay Act, the Disability Discrimination Act, the Part-time and Fixed-term Workers legislation and the Employment Equality (Sexual Orientation) and (Religion or Belief) Regulations. The Equality Act has specified 9 areas that are termed in the legislation as protected characteristics. We are committed to complying wholly and without exception with this legislation. Our existing 'Equality Statement' details the company procedures in this regard.

Whilst these laws and regulations (detailed above) can be complex, the company is committed to providing staff and partners with sufficient information in order that personnel can recognise when issues arise, avoid prohibited conduct and/or promptly seek guidance where appropriate. Company procedures exist to further detail the requirements for all Directors, staff and contractors.

Fundamentally, the success of our approach depends upon our management and employees understanding the Company's values, applying judgement and reason in an open environment and having the confidence that the Company will help and support them when dealing with difficult issues.

Reporting breaches and training:

Any employee who has concerns regarding a breach or suspected breach of the Company's policies can raise them initially with their Line Manager, or where confidential reporting is appropriate, directly to the Director. Where any concerns raised are proven to be justified, any training or re-training

required will be made available, together with changes/improvements to procedures, and/or disciplinary action will be taken as deemed appropriate.

We work proactively with clients and stakeholders to achieve our goals and constantly strive for continual improvement in these areas.

Eamon O'Loughlin

**Managing Director
Quattro (UK) Limited
10 July 2021**

Training policy

Quattro (UK) Limited is committed to complying with the requirements of the internationally recognised standards BS EN ISO 9001, BS EN ISO 14001 and BS ISO 45001 and/or any industry specific specifications to which its products and services are supplied against.

The Company therefore recognises that its directors, management and staff play a key role in achieving this.

We recognise our responsibility to arrange and provide adequate training for our entire staff in order to meet our commitments in terms of quality, health & safety, environmental and sustainability awareness and to also meet our regulatory requirements.

We therefore operate a detailed training and competency matrix within the Company in order to ensure that the business develops in such a way as to benefit the individual and the organisation itself.

Human Resource, competence, awareness and training

- All personnel whether directly or indirectly employed shall be competent on the basis of appropriate education, training, skills and experience, monitored strictly in accordance with the Company training matrix linked to our BS EN ISO 9001, BS EN ISO 14001 and BS ISO 45001 management systems
- All staff will be assessed against appropriate industry levels of competence relative to their job function and their competency/authority to work records will be maintained
- The competency of each member of the work force will be confirmed prior to allowing any individual to undertake tasks which may affect the quality of the product or services provided
- The company shall determine the necessary competence for all personnel/job functions, provided that the minimum requirements of the client are met
- The company will provide training and/or take other actions to ensure the above is satisfied and will evaluate and review the effectiveness of the action taken
- The company will ensure that all staff are aware of the relevance of the above and will maintain records of education, training, skill and experience as appropriate

Eamon O'Loughlin

**Managing Director
Quattro (UK) Limited
10 July 2021**

Leadership and commitment policy

Quattro (UK) Limited is committed to complying with the requirements of the internationally recognised standards BS EN ISO 9001, BS EN ISO 14001 and BS ISO 45001 and/or any industry specific specifications to which its products and services are supplied against.

The Company therefore recognises that its directors and management play a key role in achieving this, via leadership and commitment.

We are fully committed, via the direct involvement of top level management, to:

- Take accountability for the effectiveness of the management systems
- Ensure that the Company policies, objectives and targets are established and are compatible with the strategic direction and the context of the organisation
- Ensure the integration of the various management system requirements into the organisation's business processes
- Ensure that the resources needed for the various management systems are available
- Communicate the importance of effective management and of conforming to the various management system requirements
- Ensure that the overall management system operated by the Company achieves its intended outcomes
- Direct and support managers and staff to contribute to the effectiveness of the overall management system
- Promote continual improvement
- Support other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility

This is achieved via the continued implementation and review system operated throughout the Company, as detailed throughout the various documents herein and the wider management system.

Eamon O'Loughlin

**Managing Director
Quattro (UK) Limited
10 July 2021**

Quality policy

Quattro (UK) Limited is committed to providing products and services to the highest quality, and as such operates a quality management system certified to the internationally recognised standard BS EN ISO 9001:2015, BS EN 206 and BS 8500-2 by UKAS accredited certification body QSRMC (Quality Scheme for Ready-Mixed Concrete).

The Company strives to achieve the highest levels of quality and is committed to continually improving its management systems and services, thus working with management, employees, clients and suppliers to improve any/all aspects of its operations in order to exceed client expectations.

We are fully committed, via the direct involvement of top level management, to:

- Comply with all applicable contract specifications, legislation, regulations and standards
- Operate in a manner that encourages constructive feedback
- Operate a purchasing policy that pays due attention to quality issues as well as price, reliability of supply and other buying criteria
- Monitor and test products/services as appropriate, and manage risk throughout our operations
- Communicate the obligations and responsibilities of all concerned and offer feedback in terms of continual improvement, changes to policies and/or procedures and best practice
- Encourage and require employees to be aware of quality issues and ensure that they maintain the required Company standards at all times
- Set, review and monitor objectives and targets and provide a suitable framework for their implementation
- Review the Company quality policy, management systems and procedures at least annually, taking into consideration any issues arising, complaints, changes in legislation, Company organisation or economic circumstances, thus ensuring that the system remains relevant and appropriate to our activities

Eamon O'Loughlin

**Managing Director
Quattro (UK) Limited
10 July 2021**

Health & safety policy

Quattro (UK) Limited is committed to providing products and services to the highest quality, while operating in a safe and structured manner, and as such operates a health & safety management system to the internationally recognised standard BS ISO 45001.

The Directors and senior management willingly accept their responsibilities in terms of health & safety and as such work with management, employees, clients, suppliers and external bodies to improve health & safety standards within the Company and, via top level management involvement, is committed to continually improve its health & safety management and stewardship in line with the requirements of BS ISO 45001 and industry specific regulations.

We operate a health & safety management system covering all of our activities, including all process functions, manufacturing/production processes, all offices and any/all building and maintenance works carried out internally or via sub-contractors.

We are fully committed, via the direct involvement of top level management, to:

- The prevention of injury and ill health
- The continuous improvement of health & safety management
- Complying with all applicable health & safety legislation, UK law, regulations and standards applicable to the scope of works undertaken and the associated hazards faced
- Operating a documented health & safety system, available to all concerned, in accordance with the principles of BS ISO 45001 and providing safe working procedures for all relevant activities
- Providing a framework for setting and reviewing health & safety objectives and targets
- Communicating the obligations and responsibilities of all concerned and offering feedback in terms of continual improvement, changes to policies and/or procedures and best practice
- Encouraging all employees to be aware of health & safety issues and taking all necessary steps to ensure that they maintain the required standards at all times
- Setting and reporting objectives and targets, particular in relation to near miss, time loss and fatal incidents
- Monitoring performance against the above
- Reviewing the Company health & safety policy and procedures at least annually, taking into consideration any changes in legislation, company organisation or economic circumstances, thus ensuring that the system remains relevant and appropriate to our activities

Eamon O'Loughlin

**Managing Director
Quattro (UK) Limited
10 July 2021**

Environmental policy

Quattro (UK) Limited is committed to providing products and services to the highest quality, while operating in an environmentally sound and structured manner, and as such operates an environmental management system to the internationally recognised standard BS EN ISO 14001.

The Directors and senior management willingly accept their responsibilities in terms of the environmental and as such work with management, employees, clients, suppliers and external bodies to improve environmental standards within the Company and, via top level management involvement, is committed to continually improve its environmental stewardship in line with the requirements of BS EN ISO 14001 and industry specific regulations.

We are fully committed, via the direct involvement of top level management, to:

- Complying with all applicable environmental legislation, regulations and standards and operating in a manner that avoids pollution
- Reducing nuisance to affected parties during site activities with stray lighting, wind borne dust and litter, and excessive noise from mechanical plant and equipment
- Recycling materials wherever possible, minimising waste and strictly conforming to waste disposal regulations
- Operating a purchasing policy that pays due attention to environmental issues as well as quality, price, reliability of supply and other buying criteria
- Storing vehicles/plant, materials, powders, fuels, oils and chemicals in a safe and secure way with special attention being paid to avoid the risk of spillage into watercourses or drains
- Reducing the environmental impact of our product and services by operating an environmental management system following the principles of BS EN ISO 14001 and by using products which themselves meet the requirements of BS EN ISO 14001 and/or BES 6001
- Encouraging and requiring employees to be aware of environmental issues and taking all necessary steps to ensure that they maintain the required standards at all times
- Setting quality objectives and targets
- Monitoring performance against the above
- Review the Company environmental policy and procedures at least annually taking into consideration any changes in legislation, company organisation or economic circumstances, thus ensuring that the system remains relevant and appropriate to our activities

Eamon O'Loughlin

**Managing Director
Quattro (UK) Limited
10 July 2021**

Supply chain, sustainability and responsible sourcing policy

Quattro (UK) Limited is committed to producing the most sustainable products available, whilst also working with its supply chain partners to actively develop and introduce responsible sourcing, quality, environment and health & safety management systems, certified standards and directives to enhance the built environment, thus effectively co-operating within partnerships and supply chains to embed “sustainable thinking” across activities.

Quattro (UK) Limited is committed to continually improve its effectiveness in these areas and has and will continue to set itself meaningful and measurable objectives and targets to achieve this.

Quattro (UK) Limited recognises that the responsible sourcing of materials provides a holistic approach to managing the social, environmental and economic impacts of a product from the sources of its raw materials, through its manufacture and delivery, and, ideally, through its use, re-use and recycling, until its final disposal. In that respect, we will continue to demonstrate our commitment to this through an ethos of supply chain management and product stewardship, together with a commitment to engage with all relevant stakeholders.

Our commitment is expressed, but not limited to, the following distinct areas:

Legal and ethical compliance:

Quattro (UK) Limited policy will comply fully with UK law and act in a responsible and ethical manner (see separate policy herein) and will perform check to ensure that its supply chain also act in this manner. All applicable national and international laws and regulations by which Quattro (UK) Ltd are bound are set out in the company’s legal register.

We work with our suppliers/supply chain following the principles of BS ISO 44001 & BS 11000 to form collaborative business relationships that benefit all parties, sharing knowledge, best practice and experience as appropriate.

Energy use & greenhouse gas emissions:

Quattro (UK) Limited is committed to proactively improving our energy efficiency, reducing our greenhouse gas emissions and optimising our production and transport operations to reduce the environmental and social impact of our operations.

This obligation is reflected in the following key commitments:

- To continue implementing existing emission reduction measures
- To continually improve our energy efficiency and reduce our environmental impacts
- To use cost-effective and environmentally friendly energy sources, where available
- The procurement of reliable, cost effective and environmentally sustainable supplies where possible
- The promotion of an energy conservation culture within the company through staff education and involvement
- To evaluate greenhouse gas emissions from ready-mixed concrete production and to continually strive for new methods to reduce them

We actively work with our supply chain partners to develop and introduce suitable and sustainable transport links with regard to the supply of our constituent materials.

Resource use:

Quattro (UK) Limited is committed to environmental stewardship, the continual improvement of our environmental performance and the efficient use of natural resources.

We endeavour to protect ecosystems that may be affected by our operations and work to minimise the impacts of our business on air, water, land, natural resources, flora, fauna and people by

operating tight environmental controls, supplemented by biodiversity and geodiversity programmes. We are committed to utilising renewable resources wherever practicable, reducing our waste and developing efficient methods of utilising natural, recycled and non-renewable materials. Specifically, we are committed:

- To use sustainable, abundant raw materials in all concrete products
- To source reusable raw materials where possible in our products
- To use waste products from other industries in the production of our ready-mix concrete

Waste management

Quattro (UK) Limited is committed to reducing our overall waste and actively engages in environmental control and resource use protocols, including the use of by-products, recycled and renewable materials wherever practicable.

We will continue to develop and explore new avenues to achieve this and to maintain our continual improvement drive. Specifically, we are committed:

- To only dispose of waste to landfill when no other alternative, cost effective options are available
- To reuse/recycle waste where possible
- To promote a reuse/recycling culture within our company

Water extraction:

Quattro (UK) Limited is committed to the continual improvement of its environmental Performance and the efficient use of natural resources.

We are committed to utilising groundwater, recycled water and/or re-circulated water wherever possible and will continue to invest in systems and processes that allow us to reduce our mains water consumption as far as is practicable. Specifically, we are committed:

- To the reduction of the intensity of our water abstraction
- To use new and emerging technologies to reduce the amount of water
- To use recycled waste water and rainwater
- To ensure compliance with all relevant legislation
- To maximise our water efficiency by managing our water consumption
- To continually improve water efficiency wherever possible
- To monitor, review and assess water consumption and disclose all findings to company management
- To responsibly manage the water resources within our sites with the aim of protecting ecosystems and the surrounding environment

Transport:

Quattro (UK) Limited is committed to proactively improving our energy efficiency, reducing Our greenhouse gas emissions and optimising our production and transport operations to reduce the environmental and social impact of our operations.

In addition to customer transport (gate to client), we also monitor the constituent transport mileage on an annual basis and actively seek to source constituents from local suppliers to reduce the environmental impact of our operations.

We also actively work with our supply chain partners to develop and introduce suitable and sustainable transport links with regard to the supply of our constituent materials.

We set internal and constituent product targets and review and report these via our annual stakeholder reporting platform. Specifically, we are committed:

- To improving our practices in order to minimise the impact of our vehicles on the environment
- To regularly maintain and service all company vehicles to ensure there efficiency
- To take account of environmental considerations such as developments in fuel and vehicle technology when acquiring new company vehicles

Employment & skills

Quattro (UK) Limited recognises our responsibility to arrange and provide adequate training for our entire staff in order to heighten quality, health & safety, environmental and sustainability awareness, meet regulatory, social and industry requirements and to maintain or increase competency levels as the business develops, ensuring succession planning and implementation is undertaken in the most effective way to benefit the individual and the organisation itself.

Specifically, we are committed:

- To provide effective inductions for all employees
- To ensuring all employees are trained and supported to the extent necessary to competently and effectively undertake their respective duties
- To ensuring each employee is actively encouraged to develop his/her personal potential
- To maintain up-to-date records of education, training and experience of all employees

Site stewardship:

Quattro (UK) Limited recognises the need for effective site stewardship both during and after its operational occupation of land.

We operate 'site specific action plans' compliant with Local Authority and Environment Agency regulations and planning consents and engage with local communities and stakeholder in order to ensure that our operations are fully compliant with all legislation and are operated in a suitable manner.

Stakeholder engagement:

Quattro (UK) Limited regularly consults with stakeholders that could be affected by the production and use of our products.

The organisation also commits to providing company and product specific data pertaining to its sustainability and responsible sourcing initiatives to stakeholders upon request and to make available its annual 'Environmental & Sustainability Data Collation Report' as a freely accessible download from our website.

Local communities:

Quattro (UK) Limited is committed to the local community.

We recognise that our business can impact positively on local communities and the local economy and we are committed to ensuring we continue to offer support to the community, not only in terms of the products and services offered, but also in terms of local employment and economic growth.

Quattro (UK) Ltd is committed to engaging with local communities in a positive manner wherever possible. This is either done through the various charity work that Quattro UK Ltd are involved in or by encouraging local individuals to get in contact with us if they have any queries or concerns.

This is part of the reason why all of our vehicles and yards are signposted with contact information. Quattro (UK) Ltd recognises that our local communities are important stakeholders and who have a right to influence how we operate.

We are committed to sourcing constituent materials from local suppliers wherever possible and will continue to openly engage with the community at all levels to ensure that we enhance the community and are not seen to detract from community life in any way.

Our ongoing community liaison activities include, but are not exclusively limited to the following:

1. Complaints management
2. Community groups and meetings
3. Council planning and permit rules
4. Other as appropriate

Eamon O'Loughlin

**Managing Director
Quattro (UK) Limited
10 July 2021**

Alcohol & drugs policy

Quattro (UK) Limited has a policy of offering assistance to staff who advises that they have an alcohol or drug related problem.

Such staff must, however, advise their Manager that they wish to take advantage of this at the earliest opportunity. Subsequent discovery or disclosure prompted by the requirement to be screened will not be acceptable.

Quattro (UK) Limited will monitor the results of screening tests to identify trends in the level of alcohol and drug abuse across the company in order to ensure that the risk from drug or alcohol abuse on company operations is as low as reasonably practicable.

The misuse of drugs or alcohol by individuals can lead to an increased risk of accidents or incidents; hence, Quattro (UK) Limited aims to reduce these risks by the implementation of this Policy, together with its supporting procedures.

We are fully committed, via the direct involvement of top level management, to:

- Ensuring that the Company complies with relevant legislation relating to substance abuse at work, including without limitation, the Health and Safety at Work Act, the Transport and Works Act and the Misuse of Drugs Act
- Take a proactive approach to ensure that our workplace is a drug and alcohol free environment as part of our commitment to ensuring a safe and productive workplace, by ensuring that all relevant individuals are aware of this Policy and that anyone who declares (pre-testing) a drug, alcohol or substance related addiction or habit is given the necessary support
- Undertake measures to prevent persons attending work under the influence of illegal drugs, misused prescribed or over-the-counter medication or alcohol, using a testing regime; and provide information, instruction and awareness training to all relevant individuals on the health effects of alcohol and illegal drug use, the principles of this Policy and the repercussions of a breach of it (including disciplinary procedures and dismissal)
- Review the Company policy and procedures at least annually taking into consideration any changes in legislation, company organisation or economic circumstances, thus ensuring that the system remains relevant and appropriate to our activities

Eamon O'Loughlin

**Managing Director
Quattro (UK) Limited
10 July 2021**

Complaints and non-conformance policy

Quattro (UK) Limited is committed to complying with the requirements of BS EN ISO 9001, BS EN ISO 14001 and BS ISO 45001, and with the industry specific specifications to which its products are designed and supplied.

However, where issues or complaints arise, the Company recognises the need to deal with these in a professional, efficient and effective manner.

The Company recognises that its directors, management and staff play a key role in achieving this. Hence, the company operates a complaints system whereby:

- All complaints are logged
- All complaints are investigated and actioned in terms of corrective and preventative action, and the outcome (both internally and externally) is recorded
- All complaints are rectified to the satisfaction of the client and to the original specification

Additionally, the organisation operates a system to control non-conformances, in terms of quality, environmental and/or health & safety issues whereby:

- Any activity, product or service which does not conform to client or Company specification requirements is identified and controlled and acted upon accordingly, and in terms of product related issues is either removed or authorised/released under the concession of the client or relevant authority

Results of complaints and non-conformance issues are fed back into the overall review of the organisation's procedures and both corrective and preventative actions are undertaken, which may result in the amendment of documents/processes and/or training where required.

Eamon O'Loughlin

**Managing Director
Quattro (UK) Limited
10 July 2021**