

Anti-bribery Policy

Definition

Bribery is the accepting of gifts, money, hospitality or other favours in return for providing something of value to the briber. The purpose of this policy is to set out the rules that must be followed in this organisation to ensure that no bribery occurs.

Unacceptable behaviour

The following behaviour is unacceptable, and must not occur in this organisation:

- accepting any financial or other reward from any person in return for providing some favour
- requesting a financial or other reward from any person in return for providing some favour
- offering any financial or other reward to any person in return for providing some favour.

Business gifts

From time to time, customers, suppliers or other persons might offer a gift to an employee. This could be a small item, for example some chocolate, a mug or something of considerable value.

Small items must be reported to your line manager. Any gift deemed to be a value of over £20 must be refused on an individual basis. CTP will accept corporate business gifts, which must be registered and recorded with the Partners.

Hospitality

From time to time, customers, suppliers or other persons might invite an employee to a hospitality event. All such invitations must be reported to a Partner. Permission must be given by a Partner before an employee accepts any invitation.

Offering hospitality

This organisation occasionally runs hospitality events, primarily aimed at networking with Clients and other professionals. An employee must not organise any additional hospitality event without seeking authority from a Partner.

Responsibilities of the head of department

The Partners are responsible for ensuring that all their employees are aware of this policy, and fully understand the rules in relation to the acceptance of gifts and hospitality.

Attempts to bribe

Any employee who is concerned that he or she is potentially being bribed should report this matter to a Partner immediately.

Disciplinary action

Any employee found to have offered or accepted a bribe will face disciplinary action which could include dismissal for gross misconduct.

Raising concerns

If an employee is concerned that acts of bribery are occurring in the organisation they should inform a Partner in the first instance. If this course of action is inappropriate, the employee should inform another senior manager who is able to take the matter up with a Partner.


Affirmed by the Partners




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21 January 2022

COLIN TOMS AND PARTNERS LLP

ENVIRONMENTAL POLICY

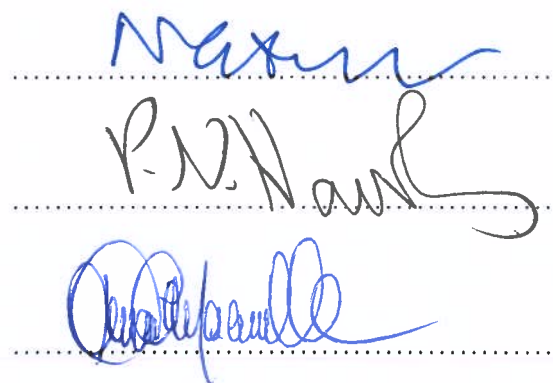
CTP's activities extend across a wide range of projects associated with the built environment. We recognise that our work can have a significant impact on the local, regional, and global environments, and we are committed to continuous improvements in environmental performance, suitable design strategies, and the prevention of pollution.

CTP operate an environmental management policy that complies with the spirit and ethos of BS EN 14001: 2004 and integrates with our Business Management System. The environmental regulations, laws, and codes of practice will be regarded as setting the minimum standards, of environmental performance.

Our specific policies are to:

- Consider the overall environmental impacts of our design work.
- Consider the environmental impacts of the materials and components we specify at all stages of their life cycle.
- Encourage clients to prevent pollution and minimise the adverse effects of their decisions on the environment.
- Use environmentally safe and sustainable energy sources to meet our needs.
- Maintain a sustainable waste management strategy, including recycling material wherever practical.
- Implement our policies through guidelines and training.
- Provide appropriate resources to implement the policy.
- Evaluate our performance in implementing the policy and complying with all applicable laws and regulations.

Affirmed by the Partners

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21 January 2022



COLIN TOMS AND PARTNERS LLP

EQUAL OPPORTUNITIES STATEMENT

CTP is committed to ensuring that it makes full use of the skills, experience and talents available in a multi-ethnic and diverse society and will do so regardless of race, colour, nationality, ethnic origins, sexual orientation, gender, disability or age.

We will ensure that all employees, clients, contractors and other persons that we may have dealings with in the course of carrying out our business will be treated with equal respect regardless of their race, colour, nationality, ethnic origins, sexual orientation, gender, disability or age.

We will ensure that we follow the recommendations of the Statutory Codes of Practice of both the Commission for Racial Equality and the Equal Opportunities Commission, and the Disability Rights Commission's Code of Practice in Employment and Occupation, in all of our employment policies, procedures and practices.

EQUAL OPPORTUNITIES POLICY

Recruitment

CTP wishes it to be known that it is an equal opportunities employer and advertises as such in any publication which involves the company.

We are committed to ensuring equality of opportunity and treatment for all persons.

Recruitment advertisements will be placed so as to ensure that all suitably qualified and experienced applicants can be aware of the vacancies and that no person or group of persons will be excluded from having the opportunity to apply for any vacancy.

No person or group of persons applying for employment will be treated less favourably than any other person or group of persons because of their colour, race, nationality, ethnic origins, religion, gender, sexual orientation, physical disabilities, age or status.

Reasonable adjustments to the working environment and/or working arrangements will be considered in the event that we are made aware of the need for this by any successful applicant.

The company, when engaging contractors and other agencies, will ensure that its commitment to equality of opportunity is fulfilled.

As an Employer

As an equal opportunities employer, CTP will ensure equality of opportunity in the promotion, appraisal, training and development of its staff and will continue to treat each employee on the basis of their relative merits and abilities regardless of their colour, race, nationality, ethnic origins, religion, gender, sexual orientation, physical disabilities, age or status.

CTP follows the recommendations of the Commission for Racial Equality's Statutory Code of Practice on Racial Equality in Employment in all its employment policies, procedures and practices and will not tolerate direct or indirect racial discrimination, victimisation, harassment or abuse by any employee. Any substantiated case of racial discrimination, harassment or abuse by an employee will be dealt with through the Disciplinary Procedures, which may ultimately result in dismissal.

Similarly, we will ensure that we comply with all relevant legislation to ensure that no employee or customer will be treated less favourably than any other person or group of persons because of their colour, race, nationality, ethnic origins, religion, gender, sexual orientation, physical disabilities, age or status. Any contravention of this policy by an employee will result in action through the Disciplinary Procedures which may ultimately result in dismissal.

We will review annually, or more frequently when circumstances arise that require immediate action, our compliance with the Disability Discrimination Act in terms of making reasonable adjustments to the working environment and/or working arrangements for any of our employees. The company also carries out an annual accessibility audit to ensure that it is doing its utmost (within the restrictions applicable to a tenant) to address any potential problems or deficiencies relating to the office's accessibility.

Policy Implementation

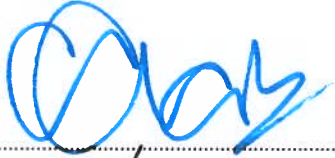
In order to ensure that the policy is being applied correctly and is achieving its stated objectives, the Partners will be responsible for periodic monitoring.

The policy will be reviewed by the Partners annually or more frequently if legislative or other changes are introduced before the annual review date. The latest review of this policy was carried out on 13 April 2017.

The policy is formally communicated to all employees as part of their induction and is also available on the company's intranet site. Guidelines, for ensuring compliance with the policy, form part of the Office Procedures manual which is issued to all employees as part of their induction process.

Employees will be regularly consulted concerning the policy and any related action plans.

Affirmed by the Partners:



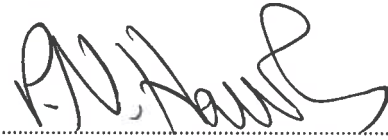
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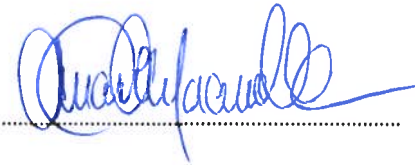
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21 January 2022

COLIN TOMS AND PARTNERS LLP

HARASSMENT AND BULLYING POLICY

CTP recognises that all members of its staff have a right to work in an environment in which the dignity of individuals is respected and which is free from harassment and bullying. We are committed to eliminating intimidation in any form.

This Policy applies to harassment related to disability, gender, marital status, sexual orientation, age, creed, colour, race, ethnic origin, physical attributes or any other reason which could demean an individual.

Harassment and bullying constitute breaches of our Equal Opportunities Policy and they are classified as misconduct, which is dealt with through the Disciplinary Procedure.

This Policy applies to all staff, whether employees of the company or self-employed, who work in the company's offices.

Definition of Harassment

Although having no formal definition in law, harassment is generally accepted to be unwanted conduct which adversely affects the dignity of the individual at work. It may encompass unwelcome physical, verbal or written behaviour which denigrates, ridicules or is intimidatory. The essential characteristic of harassment is that the action(s) are unwanted by the recipient and have a negative effect on their general well-being.

Definition of Bullying

Bullying has no single definition in law but can be summarised as being the intimidation or belittling of an individual, through the misuse of power or position, which has a detrimental effect on the well-being of that individual.

Responsibility

It is the responsibility of every member of staff not to knowingly harass or bully another member of staff. It is also the responsibility of every member of staff to notify their immediate manager or a Partner if they suspect that harassment or bullying is taking place within the offices of the company.

Third Party Harassment and Bullying

This policy also covers harassment and bullying emanating from external sources (i.e. customers, suppliers, business contacts etc.). All such instances should be notified to the member of staff's immediate manager or a Partner so that action can be taken as appropriate.

Affirmed by the Partners



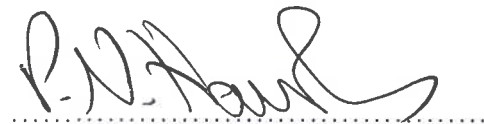
A handwritten signature in blue ink, appearing to be 'David', written on a dotted line.



A handwritten signature in blue ink, appearing to be 'Nathan', written on a dotted line.



A handwritten signature in black ink, appearing to be 'Lynne', written on a dotted line.



A handwritten signature in black ink, appearing to be 'P. N. Howard', written on a dotted line.



A handwritten signature in black ink, appearing to be 'A', written on a dotted line.



A handwritten signature in blue ink, appearing to be 'Audrey Powell', written on a dotted line.

21 January 2022

COLIN TOMS AND PARTNERS LLP

HEALTH & SAFETY POLICY

General Statement of Corporate Policy

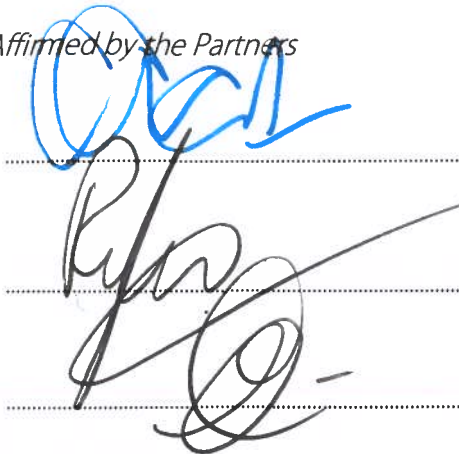
CTP's policy is to provide, so far as is reasonably possible, safe and healthy working conditions for all its employees, at whatever location they may be carrying out their duties. This policy also extends to any visitors to the company's offices.

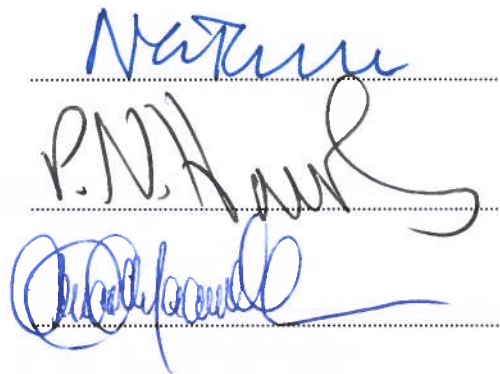
CTP will:

- Periodically review all aspects of activity to identify hazards that have the potential to cause ill health, injury or loss.
- Provide effective Health and Safety planning, organisation, control and monitoring of preventative and protective measures to reduce the risks from identified hazards, as far as is reasonably possible.
- Provide and maintain safe premises, equipment and systems of work.
- Provide a safe and healthy working environment with adequate welfare facilities.
- So far as is possible and within their control, provide safe access to the work place.
- Consult with employees, as appropriate, prior to any introduction or change of Health and Safety procedures.
- Provide relevant training to employees to enable them to recognise and discharge their own responsibilities with regard to Health and Safety.

Employees are reminded that they are required to take reasonable care to ensure their own safety and that of other employees, also for the safety of any visitors to the company's premises, and to co-operate with the company so as to enable it to carry out its responsibilities effectively.

Affirmed by the Partners





21 January 2022

COLIN TOMS AND PARTNERS LLP

QUALITY POLICY

CTP's objective is to meet our clients' needs thus ensuring our continuing success by providing a first class and memorable service which conforms to agreed requirements.

Our policy ensures that all our work, from initial enquiry to completion, is carried out in a manner that sets and maintains the highest standards.

Implementation of this policy is the responsibility of every member of staff, starting with the Partners who are ultimately responsible for ensuring that all client requirements are fulfilled.

Our operating manual is a dynamic document that describes the policies and practices which we follow. Every member of staff is required to follow this policy and the procedures applicable to their work.

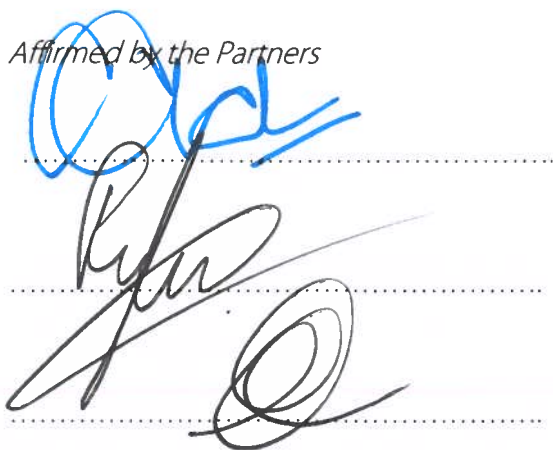
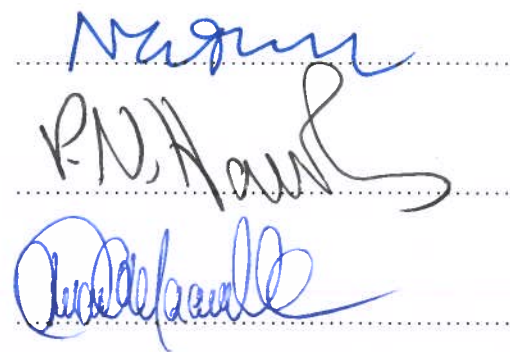
All procedures and practices, whether formally documented or otherwise, are subject to regular monitoring and updating as and when necessary to pursue our passion for excellence through continual improvement.

Our operating framework demands that activities are effectively controlled and the results are in accordance with client requirements. To ensure our objectives are met we review our activities at planned intervals.

CTP are committed to maintaining a quality management framework which focuses on our clients; their satisfaction and our continual improvement, and which meets the requirements and ethos of ISO 9001:2015 and is independently certified.

We are proud that the effectiveness of our policy and objectives continues to be endorsed through the certification of our quality management system.

Affirmed by the Partners

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COLIN TOMS AND PARTNERS LLP

WASTE MANAGEMENT STRATEGY

1. Recycle waste paper using Viridor (we also donate usable waste paper to local schools)
2. Recycle batteries – stored in office and , when sufficient quantity accumulated, taken to local retail outlet (Robert Dyas or Boots)
3. Recycle toner and inkjet cartridges (given to Charity for the Deaf)
4. Recycle cardboard (collected by Veolia Environmental Services)
5. Purchase energy efficient equipment
6. All office lights turned off at the end of the working day
7. All computers, except servers, turned off at the end of the working day
8. Paper usage minimized by sending drawings and other documents as electronic files rather than physical printed copies



CERTIFICATE OF REGISTRATION

This is to certify that

Colin Toms & Partners LLP

Suffolk House
154 High Street
Sevenoaks
Kent
TN13 1XE

has been audited and found to meet the requirements of standard
ISO 9001:2015 Quality Management System

Scope of certification

Structural and Civil Engineering Consultancy Services.
CDM Principal Designer.

Robert Veitch

Executive Vice President Fire & Building Products
Element Materials Technology

Issuing Office: Warringtonfire Testing and Certification Limited t/a BM TRADA Chiltern House, Stocking Lane, High Wycombe, Buckinghamshire, HP14 4ND, UK
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Certificate number: 4874

Issue number: 2022-01

Certificate effective date: 31 January 2022

Certificate expiry date: 13 February 2025

Date of initial certification: 15 February 2007