



Company Policies

Directors : Mark Hanlon
: Scott Dagg

Contents

1. Market Requirements Policy
2. Health & safety Policy
3. Environmental Policy
4. Business Continuity Management Policy
5. Fraud Policy
6. Anti-Bribery and Corruption Policy
7. Modern Slavery Act
8. Social Networking Sites and Blogs
9. Customer Complaints and Handling Policy

1. Market Requirements Policy

Data Types and Sources

Data includes information from CMOS, such as billing, meter reads, meter locations, allowance and trade effluent levels and customer account entries. In addition, ConservAqua will hold secondary data relating to the supply points that assist them in delivering added value services, such as accurate meter locations (descriptive and GPS), building information for benchmarking and water balance calculations. This includes both persistent and dynamic/transactional data. This will be stored in our data base backed up in the cloud through Microsoft Azure.

1.2 Content and Format

Data will be stored primarily using SharePoint and Edge, running alongside an Azure Cloud Server which offers unrivalled Firewall protection, real-time backups and infinite scalability and redundancy.

1.3 Sharing and Provisioning

Data only to be shared and utilised in compliance with prevailing data protection legislation (such as GDPR and the Data Protection Act 1998) and in a secure manner subject to our Network Security Policies. The primary route for data sharing will be through CMOS for market transactions and through Edge's billing platform and secure customer portal for the end customer. All persistent data to be checked for validity on an ongoing basis. All data failing validation tests to be marked as such and to be excluded from use or reporting with deletion only if it holds no value.

1.4 Protection

All storage and transmissions are subject to Network Security Policies.

2. Health & Safety

This is the health and safety policy statement of ConservAqua Limited

Our health and safety policy is to:

1. Prevent accidents and cases of work-related ill health
2. Manage health and safety risks in our workplace
3. Provide clear instructions and information, and adequate training, to ensure employees are competent to do their work
4. Provide personal protective equipment
5. Consult with our employees on matters affecting their health and safety
6. Provide and maintain safe plant and equipment
7. Ensure safe handling and use of substances
8. Maintain safe and healthy working conditions
9. Implement emergency procedures, including evacuation in case of fire or other significant incidents
10. Review and revise this policy regularly

2.1 Responsibilities for health and safety

1. Overall and final responsibility for health and safety: Mark Hanlon - CEO
2. Day-to-day responsibility for ensuring this policy is put into practice: Mark Hanlon - CEO
3. To ensure health and safety standards are maintained/improved, the following people have responsibility in the following areas:
 - Mark Hanlon - safety, risk assessments, consulting employees, accidents, first aid and work-related ill health, monitoring, accident and ill-health investigation, emergency procedures, fire and evacuation, maintaining equipment, information, instruction and supervision, training
4. All employees should:

- co-operate with supervisors and managers on health and safety matters.
- take reasonable care of their own health and safety; and
- report all health and safety concerns to an appropriate person (as detailed above).

2.3 Arrangements for health and safety

Risk assessment

1. We will complete relevant risk assessments and take action.
2. We will review risk assessments when working habits or conditions change.

Training

1. We will give staff and subcontractors health and safety induction and provide appropriate training (including working at height, asbestos awareness and electrical safety).
2. We will provide personal protective equipment.
3. We will make sure suitable arrangements are in place for employees who work remotely.

Consultation

1. We will consult staff routinely on health and safety matters as they arise and formally when we review health and safety.

Evacuation

2. We will make sure escape routes are well signed and kept clear at all times.
3. Evacuation plans are tested from time to time and updated if necessary.

3. Environmental Policy

We are committed to sustainable development (meeting the needs of the present without compromising the ability of future generations to meet their own needs) as a guiding principle within our work. Concern for the environment is an integral and fundamental part of this commitment. Our aim is to reduce the impact on the environment from our operations.

We currently operate a paperless office, use only hybrid cars, and expect to be “net zero” by the end of 2023.

In our role as a retailer, we aim to promote good governance into all our clients as well as dealing with aspects of poor practice. Through our work with our clients, we are in a position to promote the wider sustainability agenda. We will assess the environmental impacts of our operations and set objectives and targets to improve our environmental performance.

We will regularly review these targets.

- promote responsibility for the environment within the organisation and communicate and implement this policy at all levels within the workforce.
- reduce the use of energy, water and other resources.
- minimise waste by reduction, re-use and recycling methods.
- comply with all relevant environmental legislation/regulation.
- ensure that our policies and services are developed in a way that is complimentary to this policy.
- not prioritise funding needs ahead of sustainability requirements.
- encourage all clients to commit to the sustainable development philosophy.
- identify and provide appropriate training, advice and information for staff and encourage them to develop new ideas and initiatives.
- provide appropriate resources to meet the commitments of this policy; and
- promote and encourage involvement in local environmental initiatives/schemes.

This action plan is available to all staff on our intranet site and has been drawn to their attention. Senior Management awareness will be raised by briefing on the monthly sales and board meetings.

4. Business Continuity Management Policy

ConservAqua are utilising cloud-based services which greatly reduce hardware purchase and maintenance costs and provides unprecedented and unrivalled functionality, stability, redundancy and compliance automation.

4.1 Downtime

ConservAqua use the below services to interact with the market and our customers.

- a. Microsoft Azure Server - Managed remotely by Head of IT.
- b. 8x8 - VoIP phone provider, offering main office number and DDI's for Account Managers.
- c. MS 365 - All Staff will use Microsoft 365 for email, documents and spreadsheets.
- d. SharePoint - This will be hosted on our MS Azure Server.
- e. Edge - Web based solution which operates with full FTP, SSL licences.

All the above services function perfectly with all types of connectivity, including GSM (8x8 Only) GPRS, 3G, 4G, 5G, DSL, Leased Line and Wi-Fi. This affords to us unparalleled protection from downtime as we are able stay connected and operate a complete hosted solution to include file sharing, email, phone calls and webinars, in any disaster or incident scenario.

4.2 Risk Controls

The aim of the following controls is to ensure that full business operations are only interrupted up to one business day in the event of a major incident.

Risk - Operational Business Information Risk Controls

- All server hardware and software have an immediate Tier 1 support response time.
- All workstation hardware is covered by a Tier 1 four-hour support response time.
- All server hardware is covered by Microsoft.
- All data to be stored on server network.
- Zero consequence of individual workstation failure.
- Management of data is covered in the Network Security Policies and includes virtualisation of the servers and the backup of all data and virtual server images in the cloud to enable the speedy recovery of IT infrastructure at any location on new hardware within one day

4.3 Disaster Recovery

In the event of a major incident, which is considered to be an incident that effects, or has the potential to affect the provision of a continuous customer helpdesk, two senior manager/directors will be appointed in the following roles:

- **Scott Dagg** (Head of Operations) - To ensure the speedy set up of an alternative customer contact service, such as diversion of telephone system to a mobile telephone provision. Messages can then be taken, and services updates provided to the customers.
- **Mark Hanlon** (Managing Director) - To coordinate the setup of the temporary office within the secondary location with immediate effect and to arrange the use of a new main office location, such as a serviced office.
- **Dean Moorcraft** - CFO – To coordinate the setup of a new IT network either in the existing location or a new temporary location.

5. Fraud Policy

5.1 What this policy covers

The Company constantly strives to safeguard and act in the interest of the public and its employees. It is important to the Company that any fraud, misconduct or wrongdoing, by employees or other agents, is reported and properly addressed.

This policy applies to all employees and all other agents of the Company, who are encouraged to raise concerns in a responsible manner. The Company prefers that a concern is raised and dealt with properly, rather than kept quiet.

5.2 Your responsibilities

You are encouraged to bring to the attention of the Company any practice or action of the Company, its employees or other agents that you reasonably believe is against the public interest, in that the practice or action is:

- a criminal offence
- a failure to comply with any legal obligation
- a miscarriage of justice
- a danger to the health and safety of any individual
- Fraudulent activity
- an attempt to conceal information on any of the above

Any individual raising legitimate concerns will not be subject to any detriment, either during or after employment. The Company will also endeavour to ensure that the individual is protected from any intimidation or harassment by any other parties. This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work, which should be raised under the Company's Grievance Procedure.

5.3 Procedure

In the first instance, you should raise any concerns you have with your manager. If you believe your manager to be involved, or if, for any reason, you do not wish to approach your manager, then you should raise it with a more senior person in the Company.

Any matter raised under this policy will be investigated promptly and confidentially. The outcome of the investigation, as well as any necessary remedial action to be taken, will be confirmed to you. If no action is to be taken, the reason for this will be explained to you.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated thoroughly. If you raise any concerns under this policy, the Company is committed to ensuring that you are protected from victimisation, harassment or less favourable treatment. Any such incidents will be dealt with under the Company's Disciplinary Procedures.

6. Anti-Bribery and Corruption

6.1 What this policy covers

It is the Company's policy to conduct all of our business in an honest and ethical manner. The Company will not tolerate any acts of bribery and corruption and is committed to acting professionally and ethically in all our business dealings and relationships, wherever we operate, and we are committed to implementing and enforcing effective systems to counter bribery.

The purpose of this policy is to ensure that employees are aware of their duties towards the Company to report and help to prevent any acts of bribery across the organisation.

6.2 What is bribery?

A bribe is an inducement or reward offered, promised or provided in order to gain a commercial, contractual, regulatory, or personal advantage.

The Bribery Act 2010 contains two general offences covering the offering, promising or giving of a bribe ("active" bribery) and the requesting, agreeing to receive or accepting of a bribe ("passive" bribery). The Act also introduces a new form of corporate liability for failing to prevent bribery on behalf of a commercial organisation.

An individual who is found to have committed an offence of bribery can be imprisoned for a term of up to ten years, and the Company could face an unlimited fine for any bribery related offences committed by a person associated with us. The implications for the Company are very serious; for example, we could be excluded from tendering for public contracts and could suffer inevitable damage to our reputation. We therefore take our responsibilities in this regard very seriously.

As a result, all employees and workers are required to comply with the procedures which the Company has put in place to prevent persons associated with us from committing acts of bribery and corruption.

6.3 Your entitlements and responsibilities

The purpose of this policy is to set out the Company's responsibilities, and the responsibilities of those working for us, in observing and upholding our position on bribery and corruption; and to provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, home-workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as "workers" in this policy).

In this policy, any references to "third parties", means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

6.4 Gifts, Hospitality, Promotional, and other Business Expenditure

This policy should be read in conjunction with any Business Gifts Policy that may be in operation at any time. This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties. Hospitality and promotional, or other business expenditure which seeks to improve the image of the Company, or to establish cordial relations with our clients, suppliers and business partners, is recognised as an accepted and important part of doing business.

Subject to prior authorisation by the Managing Director, the Company may allow reasonable and proportionate hospitality and promotional or other similar business expenditure intended for these purposes. However, offers or receipts of hospitality and other similar business expenditure can be employed as a form of bribery. It is therefore essential that any such corporate gifts and receipts of this nature are reported and duly authorised.

The giving or receipt of gifts is not prohibited, if the following requirements are met:

- it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- it complies with local law;
- it is given in the Company's name, not in your name;
- it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- it is appropriate in the circumstances, for example, it is often customary for small gifts to be given at Christmas time;
- taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;
- it is given openly, not secretly; and
- gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of the Managing Director.

In all circumstances, the test to be applied is whether, the gift or hospitality is reasonable and justifiable.

It is not acceptable for you (or someone on your behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by the Company in return;
- threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy.

6.5 Facilitation payments

We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official.

If you are asked to make a payment on the Company's behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with the Managing Director.

Kickbacks are typically payments made in return for a business favour or advantage. All workers must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

Recording the receipt and giving of gifts

You must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.

You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness.

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

6.6 Procedure - Reporting a concern.

You must notify the Managing Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. For example, if a third party, client or potential client offers you something to gain a business advantage with the Company or indicates to you that a gift or payment is required to secure their business.

Any employee who breaches this policy will face disciplinary action, which could result in the employee's dismissal for gross misconduct.

You are encouraged to raise concerns about any issue or suspicion at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with the Managing Director. Concerns should be reported by following the procedure set out in the Company Whistleblowing Policy.

It is important that you notify the Managing Director as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

6.7 Confidential and safe reporting procedures

Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy.

The Company is committed to ensuring that no one suffers any detrimental treatment as a result of raising any concerns under this policy. If you believe that you have suffered any such treatment, you should inform the Managing Director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the Employee Handbook.

6.8 Training and implementation

Training on this policy forms part of the induction process for all new workers. All existing workers will receive regular, relevant training on how to implement and adhere to this policy. Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate.

The Managing Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Managing Director will have primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

7. Slavery and Human Trafficking Polciy

7.1 What this policy covers

Slavery and Human Trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

7.2 Our Commitment

The Company is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

We are committed to acting ethically and with integrity in all our business relationships and taking reasonable steps to ensure slavery and human trafficking are not taking place in any business or organisation that has any sort of a business relationship with our Company.

7.3 Due diligence processes for slavery and human trafficking

The Company has zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

As part of our initiative to identify and mitigate risk the Company has in place systems to encourage the reporting of concerns and the protection of whistleblowers.

Our supply chain providers are always with a UK provider and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.

7.4 Training

The management team are responsible for compliance within their respective departments and in their supplier relationships and have been trained accordingly.

All employees receive an induction into the business where our policies, procedures and expectations are outlined.

7.5 Our effectiveness in combating slavery and human trafficking

The Company uses the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Use of labour monitoring, right to work documentation and payroll audits
- We maintain a level of communication and personal contact with the next link in the supply chain to ensure their understanding of, and compliance with, our expectations.
- We regularly review supply chain policies, codes of conduct and our working practices to show commitment.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's slavery and human trafficking statement.

7.6 Reporting suspicions of slavery

Employees can report any suspicions of slavery either through the Company's Public Interest Disclosure (Whistleblowing) policy or externally to the Modern Slavery Helpline. Details are set out below:

<https://modernslavery.co.uk/contact>.

[html](https://modernslavery.co.uk/contact) 0800 0121 700.

8.Social Networking Sites and Blogs

8.1 What this policy covers

This policy sets out the Company's position on employees' use of social networking sites and blogs, whether conducted on Company media and in work time or your own private media in your own time.

8.2 Your responsibilities

Social networking sites and blogs offer a useful means of keeping in touch with friends and colleagues, and they can be used to exchange views and thoughts on shared interests, both personal and work-related.

The Company does not object to you setting up personal accounts on social networking sites or blogs on the internet, in your own time and using your own computer systems. However, you must not do so on Company media or in work time.

You must not link your personal social networking accounts or blogs to the Company's website. Any such links require the Company's prior consent.

You must not disclose Company secrets, breach copyright, defame the Company or its clients,

suppliers, customers or employees, or disclose personal data or information about any individual that could breach the Data Protection Act 1998 on your blog or on your social networking site.

Social networking site posts or blogs should not be insulting or abusive to employees, suppliers, Company contacts, clients, or customers.

8.3 References to the Company

If reference is made to your employment or to the Company, you should state to the reader that the views that you express are your views only and that they do not reflect the views of the Company. You should include a notice such as the following:

'The views expressed on this website/blog are mine alone and do not reflect the views of my employer'

You should always be conscious of your duty as an employee to act in good faith and in the best interests of the Company under UK law. The Company will not tolerate criticisms posted in messages in the public domain or on blogs about the Company or any other person connected to the Company.

You must not bring the Company into disrepute through the content of your website entries or your blogs.

Any misuse of social networking sites or blogs as mentioned above may be regarded as a disciplinary offence and may result in dismissal without notice.

You should be aware that any information contained in social networking sites may be used in evidence, if relevant, to any disciplinary proceedings.

8.4 Personal Social Media Use

You may not use social media for personal purposes at any time during work hours on computers, mobile devices or other communication equipment provided by the Company (or on computers, mobile devices or other communications equipment belonging to themselves, whether via the Company network or otherwise).

8.5 Business Use of Social Media

If your job duties require you to speak on behalf of the Company in an online social media environment, you must still seek approval for such communication from your manager, who may require you to have training before you are permitted to participate in social media on behalf of the Company.

Similarly, if you are invited to comment about the Company for publication anywhere, including in any social media outlet, you should inform your manager and you must not respond without prior written approval.

If you disclose your affiliation with the Company on your business profile or in any social media postings, you must state that your views do not represent those of your employer, unless you are authorised to speak on our behalf. You should also ensure that your profile and any content you post are consistent with the professional image you present to clients and colleagues.

8.6 Third parties

You must not disclose any information that is confidential or proprietary to the Company or to any third party that has disclosed information to the Company.

This policy should be read in conjunction with the Company's policies on Computers and Electronic Communications and Monitoring.

8.7 Confidential Information and Intellectual Property

You must not post comments about sensitive business-related topics, such as the Company's performance, or do anything to jeopardise trade secrets, confidential information and intellectual property. You must not include the Company's branding, logos or other trademarks in any social media posting or in your profile on any social media platform.

You are not permitted to add business contacts made during the course of your employment to personal social networking accounts.

Details of business contacts made during the course of your employment are regarded as Company confidential information, and are the property of the Company. This includes information contained in databases such as address lists contained in Outlook, or business and contacts lists created and held on any electronic or social media format, including but not limited to LinkedIn and Facebook.

Company email addresses may not be used to sign up to any social media websites.

On termination of employment you must provide the Company with a copy of all such information, surrender or delete all such information from your personal social networking accounts, and destroy any further copies of such information that you may have.

Updating your LinkedIn profile to refer to your new employer and setting up your account to ensure that your contacts receive notification of this will be regarded as an act of unlawful solicitation and/or an unlawful attempt to deal with customers, employees, and business contacts of the Company and may result in civil proceedings being brought against you.

8.8 Monitoring

The Company reserves the right to monitor, intercept and review, without further notice, staff activities using our IT resources and communications systems, including but not limited to social media postings and activities, to ensure that our rules are being complied with and for legitimate business purposes and you consent to such monitoring by your use of such resources and systems.

8.9 Procedure

Breaches of this policy will be dealt with under the Company's Disciplinary Procedure. You should be aware that the Company regards breach of any part of this policy as gross misconduct that may result in disciplinary action up to and including dismissal without notice.

If you become aware of information relating to the Company posted on the internet, you should bring this to the attention of your manager.

9. Customer Complaints and Handling Policy

9.1 Complaints and Escalation Procedure

At ConservAqua we believe that customer service is everyone's job and we work hard everyday to give you the service that your loyalty rightly deserves!

We promise to put you at the heart of our business and will make great efforts to ensure that our customer service is:

- Helpful and easily reachable – Direct line to your account manager

- Knowledgeable and reactive – Expert account managers will take ownership of the problem immediately and see all issues through to resolution
- Striving to bring improvements to our service
- Tailored to your individual requirement, with bespoke options for all your needs

Even with the best intentions things can go wrong and for those such occasions we have the following procedures to ensure that, if we do drop the ball, we pick it back up quickly and make changes to see that such occurrences never happen again.

Your first port of call for any issues is your Account Manager.

1. Account Manager (03330 16 56 56)

Send an email operations@ConservAqua.co.uk

Write a letter to: Customer Services, ConservAqua, Riverbridge House, Leatherhead, Surrey, KT22 7ND

In the unlikely event that your Account Manager is unable to resolve your issue, and in-keeping with our commitment to resolving all queries satisfactorily, you can escalate it to the Operations Director, Scott Dagg who will be only too happy to assist you.

2. Operations Director (03330 16 56 65)

Email: sdagg@ConservAqua.co.uk

If you are still not completely satisfied with how your issue is being dealt with you may escalate further to CCWater. (Consumer Council for Water)

3. Fill out an online complaint form: <https://ccwater.custhelp.com/app/ask>

Write to: Consumer Council for Water, 1st Floor, Victoria Square House, Victoria Square, Birmingham, B2 4AJ

Call on 0300 034 2222 in England or 0300 034 3333 in Wales

(8.30am to 5pm, Monday to Friday)