

INTRODUCTION

1.1 WELCOME

The success of the Company is directly related to the quality of our employees and our work environment. With that in mind, this handbook was developed to inform you of the policies, rules and procedures in force to maintain the level of quality, equality and fair dealing that we at the Company think important for our continued success.

Please read and familiarise yourself with this handbook as its contents are part of the terms and conditions of your employment with the Company, unless expressly indicated otherwise. If you have any questions about the contents, please address them to your manager.

It is our intent that this handbook will cover most events during your employment with us, but no handbook can fully address all circumstances. The Company reserves the right to review, revise, amend or replace the contents of this handbook and introduce new policies from time to time reflecting the changing needs of the business and to comply with new legislation.

If any part of the handbook is considered to be in conflict with existing law, regulations or other statutory requirements, only the part that is in direct conflict will be invalid. The remaining part of the handbook's policy statements, rules and procedures and Codes of Practice will remain in force.

1.2 POLICY OF EQUAL OPPORTUNITY (NON-CONTRACTUAL)

The Company is committed to eliminating discrimination and encouraging diversity amongst our workforces. Our aim is that each employee feels respected and is valued based upon their skills, performance, and commitment.

It is the continuing policy of the Company to provide equal opportunity employment to all employees without regard to the actual or perceived protected characteristics referenced below. We are committed to treating all employees fairly and as such no employee will be treated less favourably due to their association with someone who has a protected characteristic.

Protected characteristics

- Age;
- Disability;
- Gender Reassignment;
- Marriage and Civil Partnership (applies only to someone who actually personally has this characteristic);
- Pregnancy and Maternity;
- Race (including ethnic origin, colour, citizenship, nationality, and national origin);
- Religion or Belief;
- Sex;
- Sexual Orientation.

People will be judged solely on merit and ability during recruitment, selection, training, development and promotion throughout their employment.

Fair treatment

All employees whether full-time, part-time or temporary, will be treated fairly and with respect. This policy applies to all employment decisions, including those in connection with:

- Recruitment, selection, promotion and advertisement of jobs;
- Terms and conditions of employment;
- Training, career development and progression;
- Grievance and disciplinary procedures;
- Performance;
- Relationships between members of staff;
- Treatment of employees when their contract ends.

Enquiries about disability and health during recruitment

As an equal opportunity employer, we will not ask about the health of an applicant (including whether they are disabled) prior to either offering work to the applicant or prior to including the applicant in a pool of applicants from which we intend to select a person to whom to offer work, unless an exemption applies.

The only circumstances in which the Company may make pre-employment health enquiries are:

- To establish whether the Company has a duty to make a reasonable adjustment in respect of an interview/assessment process;
- To establish whether the applicant will be able to carry out a function that is intrinsic to the work concerned;
- To monitor the diversity of applicants;
- To implement positive action in employment for disabled people;
- To recruit appropriately where having a particular disability is a requirement of the role;
- To comply with national security vetting requirements.

Promotion of equal opportunities and observance of the policy

Each employee has an obligation to promote an equal opportunity environment within the Company. As our employee, you have a duty to observe and apply this policy at all times. In particular you must not:

- Discriminate against or harass colleagues, other employees or job applicants;
- Discriminate against or harass visitors, clients, customers, suppliers, consultants, or contractors;
- Discriminate against or harass members of the public in the course of your duties, irrespective of whether such conduct occurs on company premises;
- Induce, or attempt to induce, others to practise unlawful discrimination;
- Victimise individuals who have made allegations or complaints of discrimination or provided information about such discrimination.

Violation of this policy is a serious offence and could result in disciplinary action and/or summary dismissal.

Hannah Steward, Office Manager, will, with the assistance and co-operation of senior management and employees, take steps to ensure compliance with this policy.

If you feel that you have been treated in a manner that is not in accordance with this policy, please initially raise the matter with your manager. The Company takes such matters seriously and aims to resolve any complaints in accordance with its grievance procedure. If there is a good reason as to why you are unable to raise this matter initially with your manager, please contact the Office Manager in relation to your complaint. All complaints will be treated seriously and, where possible, in confidence. For more details, please refer to the grievance procedure found at the end of this handbook.

1.3 ANTI-BRIBERY COMMITMENT

Heartland Pipelines Limited and NTR Plant Services Ltd is committed to the practice of responsible corporate behaviour and to complying with all laws, regulations and other requirements which govern the conduct of our operations.

The Company is fully committed to instilling a strong anti-corruption culture and is fully committed to compliance with all anti-bribery and anti-corruption legislation including, but not limited to, the Bribery Act 2010 (“the Act”) and ensures that no bribes or other corrupt payments, inducements or similar are made, offered, sought or obtained by us or anyone working on our behalf.

Bribery

Bribery is defined as the giving or promising of a financial or other advantage to another party where that advantage is intended to induce the other party to perform a particular function improperly, to reward them for the same, or where the acceptance of that advantage is in itself improper conduct.

Bribery is also deemed to take place if any party requests or agrees to receive a financial or other advantage from another party where that advantage is intended to induce that party to perform a particular function improperly, where the acceptance of that advantage is in itself improper conduct, or where that party acts improperly in anticipation of such advantage.

Bribery of a foreign official is defined as the giving or promising of a financial or other advantage which is intended to influence the official in order to obtain business or an advantage in the conduct of business unless the foreign official is required or permitted by law to be influenced by such advantage.

Consequences of Bribery

Anyone or any organisation found guilty of bribery under the Act may face fines and/or prison terms. In addition, high legal costs and adverse publicity are likely to result from any breach of the Act.

For employees of the Company, failure to comply with this Policy and/or with the Act may result in:

- disciplinary action which may include dismissal; and
- criminal penalties under the Act which may result in a fine and/or imprisonment for up to 10 years.

For the Company, any breach of this Policy by any employee or business associate may result in:

- the Company being deemed to be in breach of the Act;
- the Company being subject to fines; and
- the Company suffering negative publicity and further associated damage as a result of such breach.

Responsibility for Compliance and Scope of Policy

This Policy applies to all employees, agents, contractors, subcontractors, consultants, business partners and any other parties (including individuals, partnerships and bodies corporate) associated with the Company or any of its subsidiaries.

It is the responsibility of all of the abovementioned parties to ensure that bribery is prevented, detected and reported and all such reports should be made in accordance with the Company’s Whistleblowing Policy or as otherwise stated in this Policy, as appropriate.

No party named above may:

- give or promise any financial or other advantage to another party (or use a third party to do the same) on the Company's behalf where that advantage is intended to induce the other party to perform a particular function improperly, to reward them for the same, or where the acceptance of that advantage will in itself constitute improper conduct;
- request or agree to receive any financial or other advantage from another party where that advantage is intended to induce the improper performance of a particular function, where the acceptance of that advantage will in itself constitute improper conduct, or where the recipient intends to act improperly in anticipation of such an advantage.

Parties must:

- be aware and alert at all times of all bribery risks as described in this Policy and in particular as set out in section 9 below;
- exercise due diligence at all times when dealing with third parties on behalf of the Company; and
- report any and all concerns relating to bribery to a Company Director or, in the case of non-employees, their normal point of contact within the Company, or otherwise in accordance with the Company's Whistleblowing Policy.

Facilitation Payments

A facilitation payment is defined as a small payment made to officials in order to ensure or speed up the performance of routine or necessary functions.

Facilitation payments constitute bribes and may not be made at any time irrespective of prevailing business customs in certain territories.

Facilitation or similar payments may be made in limited circumstances where your life is in danger but under no other circumstances. Any payment so made must be reported to a Company Director as soon as is reasonably possible and practicable.

Gifts and Hospitality

Gifts and hospitality remain a legitimate part of conducting business and should be provided only in compliance with the Company's Gifts and Hospitality Policy.

Gifts and hospitality can, when excessive, constitute a bribe and/or a conflict of interest. Care and due diligence should be exercised at all times when giving or receiving any form of gift or hospitality on behalf of the Company.

The following general principles apply:

- Gifts and hospitality may neither be given nor received as rewards, inducements or encouragement for preferential treatment or inappropriate or dishonest conduct.
- Neither gifts nor hospitality should be actively sought or encouraged from any party, nor should the impression be given that the award of any business, custom, contract or similar will be in any way conditional on gifts or hospitality.
- Cash should be neither given nor received as a gift under any circumstances.
- Gifts and hospitality to or from relevant parties should be generally avoided at the time of contracts being tendered or awarded.
- The value of all gifts and hospitality, whether given or received, should be proportionate to the matter to which they relate and should not be unusually high or generous when compared to prevailing practices in our industry or sector.
- Certain gifts which would otherwise be in breach of this Policy and/or the Hospitality and Gifts Policy may be accepted if refusal would cause significant and/or cultural offence, however the Company will donate any gifts accepted for such reasons to a charity of a Company Director's choosing.