

TRUMETER TECHNOLOGIES LIMITED

COMPANY HANDBOOK

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WELCOME

We would like to welcome you to Trumeter, we trust you will find the information contained within this handbook both useful and informative. If you have any concerns please feel free to raise these with your immediate manager, the HR Manager or any other member of the Management Team who you would feel comfortable talking to. Please remember it is always better to raise concerns as soon as they occur as in most cases these concerns can be dealt with satisfactorily if raised at an early stage.

Trumeter prides itself on creating a warm friendly atmosphere for you to work in and has a history of good industrial relations. We continuously strive to improve the working environment, and would ask for your assistance in maintaining a clean and pleasant environment for you and your colleagues.

THE COMPANY AND ITS PRODUCTS

Trumeter Technologies Limited is a global designer, manufacturer and distributor of sophisticated measurement instruments and automotive lighting systems. Trumeter has been manufacturing equipment for use across a wide range of industries since 1937.

Trumeter prides itself on working in close partnership with its customers, building a reliable and sustainable association and through establishing open and constructive relationships Trumeter is able to deliver the best possible service.

If you would like further information on the Company's products, please ask your immediate manager or look on the website www.trumeter.com.

ABOUT YOUR HANDBOOK

The handbook is held electronically on the intranet / in Q Pulse. If you are referring to a printed copy, please ensure issue reference matches electronic version.

The handbook has been split into two sections:

Section 1

Contains information about the Company background and other policies such as Health and Safety and Employee Development, to give you general information about the way in which the Company operates, information in section 1 does not form part of your contract of employment

Section 2

Provides you with information which forms part of your Contract of Employment and is supplementary to your Statement of Employment Particulars which may vary from some of the provisions in this handbook. If so, the terms of this handbook should be read as being amended and superceded by your Contract of Employment.

EMPLOYMENT AND EMPLOYEE RELATIONS

The Company's employment and employee relations policy has two objectives:

- To maintain the company's reputation as a fair and reasonable employer.
- To ensure the management's right to manage.

THE POLICY IS

1. To recruit suitable employees without regard to any of the protected characteristics of the Equality Act 2010 namely Age; Disability; Gender Re-assignment; Marriage and Civil partnership; Race; Religion or belief; Sex or sexual orientation (hereafter known as the "Protected Characteristics".)
2. To pay fairly in proportion to contribution and the success of the business.
3. To respect the rights of the individual.
4. To maintain good communication in a professional but friendly manner.
5. To train employees to a standard necessary to fulfil the requirements of their job and where possible promote from within the Company.
6. To maintain a safe, orderly and tidy environment.
7. To recognise that the Company and the employee have responsibilities to each other.
8. To not allow any bullying or harassment of any kind.

SECTION 1

1.0 ABSENCE POLICY

1.1 Policy

We value the contribution all our employees make to the success of our business. When any employee is unable to be at work for any reason, not only do we miss their contribution, but there is a significant cost to the business. High levels of absence affects everyone in the organization, therefore everyone is expected to maintain a satisfactory record of attendance.

The Company has established this procedure to support its policy of reducing absenteeism. The procedure seeks to ensure that employees' absences are monitored and the causes of absenteeism dealt with where possible. Whilst it is not a disciplinary procedure, its provisions may lead to dismissal. Unauthorised absence will be regarded as a disciplinary offence and will be taken through the disciplinary procedure.

Obviously, it is of no benefit to anyone to have genuinely sick employees struggling in to work. That is not the aim of this policy and procedure. If employees do have a problem, however, whether at work or at home, staying away from work may not be the answer. A discussion with their manager, the HR Manager or any other member of the Management Team who they would feel comfortable talking to, may help them to work things out.

There are three central features to the Company's procedure: strict adherence to the absence reporting procedure, review of sickness data and feedback to the employee and the back-to-work interview with the employee's manager. The reporting procedure enables the Company to monitor absences and identify any problems as well as ensuring the proper functioning of each department and enabling employee to be paid correctly. The sickness data review enables the company to identify employees with recurrent medical problems that may affect their ability to perform their job satisfactorily. The back-to-work interview enables the Company to ensure employees are fit for work, to offer any assistance that may be appropriate and to help them deal with any outstanding problems they may have.

1.2 Short Term Sickness Absence Procedure

1.2.1 Reporting/Notification procedure

The purpose of requiring notification of absence is to enable the Company to make any necessary arrangements for cover and to ensure employees are paid in accordance with their entitlements.

In the event of absence from work as a result of sickness the employee should notify the HR Manager as early as possible on the first day of absence by telephoning the Company. The same rule applies for absence for any other reason.

If the employee does not notify the Company or make arrangements to notify the Company on the first day of absence, any absence may be treated as unauthorised.

In the event of absence due to illness, failure to notify the Company may result in payment of some Company Sick Pay (CSP) / Statutory Sick Pay (SSP) being withheld. On return to work, the employee will be expected to attend a 'Back-to-Work' interview

1.2.2 Payment during sickness and/or injury

SSP regulations (including payment rates) are set by the HMRC - Current regulations are available from the HR Manager on request. SSP qualification days for all employees are Monday to Friday inclusive.

1.2.3 Payment of Company Sick Pay

Company Sick Pay shall only be provided for contractual days of work on which the employee is unable to attend work as a result of personal sickness, or injury.

The Company is not obliged to pay Company Sick Pay on any specified date.

The maximum duration over which Company Sick Pay may be calculated in any rolling twelve month period for full time employees is 20 working days at full pay. After 12 months service there will be an additional 20 working days at half pay.

The Company reserves the right to withhold payment of Company Sick Pay, and recover any payments already made, in the following circumstances:-

- if the employee fails to follow, in full, all required notification/certification procedures.
- If the employee has any live disciplinary issues relating to absence or lateness
- if the employee attempts to abuse the scheme in any way.
- where it is evident that sickness is the direct result of the employee's own misconduct.
- where it is supposed that the employee is incapable of work because of addiction to drugs, dangerous substances etc., or because absence has resulted from accidents sustained by participating in any unusual or dangerous sport, deliberate self-injury, or in consequence of any secondary employment.
- if an employee accepts or undertakes gainful secondary employment during sickness absence.

1.2.4 Rate of Company Sick Pay

The employee's weekly salary, calculated on their basic pay rate, as applicable on the day prior to the first day of absence shall be the normal level of Company Sick Pay provided for each week of absence. Individual days of Company Sick Pay shall be computed on the basis of 1/5th of the employee's gross basic weekly salary.

Company Sick Pay shall only be provided for contractual days of work i.e. Monday to Friday.

1.2.5 Self-Certification Forms and Doctor's Statements

If your absence is likely to last for more than one day but not more than 5 working days, you must complete a Self Certification Form, which will be required not later than the first day of your return to work.

All Self Certification Forms and Doctor's Statements must be sent to the Company. If you do not complete a Self Certification form your absence after the first day will be treated as unauthorised even though you have notified the Company on your first day of absence.

If the absence is for more than 5 working days, a Statement of Fitness for Work should be obtained from a GP and must be sent into the Company as soon as possible. This must be legible and must cover the total period of sickness, after the first 5 working days.

1.2.6 Late Attendance

If the employee is unable to attend work for the start of the normal working hours and is making all efforts to attend late, they **must notify** their Manager by contacting him/her at the earliest opportunity. Failure to do so will be regarded as an unauthorised absence.

1.3. Back-to-Work Interview

On the day of the employee's return to work following any absence, their immediate Manager (or if he/she is unavailable another manager) will, at the earliest opportunity, hold a brief meeting with them. He/she will ask them to complete a self-certification form, if not already provided. He/she will also discuss with them the reasons(s) for their absence, whether there is anything the Company can do to assist them. If they do have underlying problems, which are causing them to take time off, this may be an opportunity for the employee to air them. At the interview, their manager will also be able to bring to their attention their current attendance record. The purpose of the interview is a fact-finding meeting in which information is exchanged.

1.4 Sickness Absence Review Procedure

Attendance records for the organization and at individual level will be reviewed regularly.

1.4.1 Measuring

At the organization level, the 'lost time rate' will be used, which shows the percentage of the total time available which has been lost due to sickness. Our aim is < 0.8%.

On an individual level the "Bradford Factor" will be used, which weights the number of instances of absence so that it has a higher impact on the score than the length of time away from the business

$S \times S \times D$, where:

S = the number of absences; and

D = total days absent in any given period

For example:

An employee with two periods of absence totalling 10 days

$$2 \times 2 \times 10 = 40$$

An employee with six periods of absence totalling 10 days

$$6 \times 6 \times 10 = 360$$

All sickness absence is recorded, however absences related to the "Protected Characteristics" will be recorded separately from other sickness absence.

Employees with zero absence in the preceding 6 months will be entered into a £50 prize draw to take place in July and January each year.

1.4.2 Monitoring

"Bradford Factor" scores will be monitored quarterly, and the following scores will act as trigger levels for action. Please note these scores are not an indication of entitlement.

12 for each quarter

30 for any 6 month period

60 for any 12 months rolling period

If an employee's Bradford score is above the target scores, an interview will be called to discuss the score with the line manager, a note of which will be filed in the employee's personal file. If there appears to be an underlying cause for the absences, permission may be sought from the employee to seek a medical report from their doctor.

Please note that in certain circumstances, excessive absence can result in dismissal. However, no employee will be dismissed on grounds of sickness absence without due warning and without the disciplinary procedure being followed.

1.5 Stage one - Informal Caution

Before any formal action is taken because of unacceptable attendance, the Immediate Manager / Supervisor will first interview the employee to discuss the occasions and reasons for the absences. At this stage, the employee may be accompanied by a fellow employee or trade union official. Attention will be drawn to this policy and procedure and to the Company's concerns about the employee's attendance. If it appears that there is an underlying cause for the absence the employee may be asked for permission to seek a medical report from their doctor or alternatively referred to a Doctor appointed by the Company. The employee has the right to view the doctor's report and to allow the report to be seen by the Company.

If a report is sought, the interview will be postponed until receipt of the report when the Immediate Manager / Supervisor will discuss its contents and its implications with the employee. Where it is established, following medical advice, that the employee is disabled within the meaning of the Disability Discrimination Act 1995, they will be consulted as to whether any reasonable adjustment can be made to the Company premises or working arrangements to help reduce the need for the absences.

A note of this interview will be filed in the personal file and a copy will be available for the employee.

1.5.1 Monitoring

If after this interview the employee maintains the required standard of attendance, they will be informed of their achievement and the necessity to maintain that improvement. However, should improvement not be achieved during the review period (normally 3 months or earlier should the absence record deteriorate) then the matter will be dealt with under the formal procedure.

1.6 Stage Two - Formal Caution

At this stage, the employee can be accompanied by a fellow employee or trade union official. At the interview the occasions and reasons for absence will be discussed. Employee will be reminded of the previous stage of the procedure, and be informed that unless the sickness absence record improves and is maintained at an acceptable level (an agreed action plan for improvement) over the next two months and continues to be maintained over the following two months, dismissal will follow.

All of these matters will be confirmed in writing in a Formal Caution.

1.6.1 Monitoring

If, following this caution, the employee maintains the required improved standard of attendance; they will be informed of their achievement and the necessity to at least maintain the improvement. However, should improvement not be achieved or maintained over the following two months then the matter will be moved to the next step.

1.7 Dismissal

In the event that the required improvement does not materialise or is not maintained as required, the Manager or nominated deputy will interview the employee who will have the right to be accompanied by a fellow employee or trade union official. The Manager will discuss the absences and the caution issued with the employee, who will have a full opportunity to put their case. The Manager will consider whether a (further) medical report is necessary and if so, the meeting will be adjourned pending receipt of the report.

Where, in the light of any medical report, it is deemed appropriate to do so, the procedure set out below (Procedure 1.9 .B) will be followed.

Otherwise, the Manager will adjourn to consider the absence record in the light of the cautions and any explanations put forward by the employee, and will confirm the decision within one working day. If determined that the attendance record warrants it, taking into account the explanations and cautions issued, then the employee will be dismissed with appropriate notice.

The decision will be given in writing, including the reason for the decision and informing of your right of appeal.

1.8 Appeal – CEO

Upon receiving written notification of dismissal, the employee may appeal against the decision, by notifying the CEO in writing of the intention to appeal, stating the reasons, within seven working days of receipt of the notification.

The CEO or nominated deputy not involved in the decision to dismiss will hear the Appeal normally within seven further working days.

At the appeal hearing the employee will have an opportunity to state their case and reasons for the appeal. The employee will also have the right to be accompanied by a fellow employee or trade union official...

The decision of the CEO or nominated deputy hearing the appeal will be final.

1.9 Procedure in the case of long-term sickness absence or where frequent short-term absence is due to underlying illness.

- A. It is the responsibility of the Immediate Manager to monitor sickness absence and along with the HR Manager to maintain regular contact with employees during long periods of sickness absence, to determine the current situation and likely duration of the absence. It is the employees' responsibility to provide the Company with relevant information and certificates throughout a period of absence. The Reporting and Certification provisions of Procedure 1.2.1 (above) apply in all cases
If the absence appears likely to continue for a considerable period, the Immediate Manager will arrange with employees consent to seek an up-to-date medical report

from their GP or specialist with particular reference to the employees prospects of returning to work in their existing job or some other capacity. Alternatively, a report may be sought from a doctor appointed by the Company.

- B. On receipt of the report, a meeting will be convened with the employee to discuss, in the light of it, the prospects for future employment, including whether alternative employment or ill-health retirement might be appropriate. Where it is established that the employee is disabled within the meaning of the Disability Discrimination Act 1995, consideration will be given to whether any reasonable adjustment can be made to Company premises or working arrangements to enable them to resume employment. If it is considered, however, following this consultation, that the options of alternative work or (where appropriate) alternative working arrangements or ill-health retirement are not appropriate, it may be necessary to terminate the employment with appropriate notice.

The employee would have the right to appeal against the dismissal; see "Employee right of appeal" above.

Should the employee refuse to co-operate in providing medical information they will be informed in writing that any decision concerning their future employment will be based on information available to the Company.

2.0 **COMMUNICATION & INVOLVEMENT**

The Company recognises the importance of an effective two way flow of information and much effort and emphasis is therefore placed on the establishment and maintenance of good communication channels across the organisation. The various methods of communication described below are designed both to provide information and feedback in order to keep employees more involved in the activities of the business and to encourage an active, two-way communication process.

2.1 **Open Door Policy**

One thing we do not want anybody at the Company to do is keep a work problem to them. Our whole system of operation is based on freedom of discussion, and debate and candour are openly encouraged. That means, ask for help when you need it, make a suggestion when you want to, and air your complaints when you have them. Remember, the door is always open!

2.2 **Employee Meetings**

Regular employee meetings will be arranged and are designed to encourage discussion about issues and matters which directly affect everyone. In addition, the meetings are used to communicate forthcoming developments, plans and events within the Company.

Employee meetings are informal and encourage full participation from everyone. Questions or issues raised in the meetings which cannot be fully answered at the time, will be followed up, and feedback will be given at the next meeting if not before.

2.3 Notice Boards

A wide range of topics and notifications both of a Company and general nature are posted on the notice boards. The main notice board is situated in the break room. In order to maintain contact with current topics, affairs and events you should make a point of reading notice boards on a regular basis.

3.0 DATA PROTECTION POLICY

All personal data held regarding employees is kept in an organized, secure filing system. It is the responsibility of the employee to ensure any changes to their contact details are notified to HR. Access to employee information will be restricted to those who have a genuine requirement for legal, administrative or management purposes.

4.0 DIGNITY AT WORK POLICY

4.1 Policy - Introduction

Harassment and bullying for any reason is unacceptable behaviour which the Company will not tolerate. Every employee of the Company has the right to be treated with dignity and respect. Appropriate disciplinary action, which may include dismissal, will be taken against any employee, of whatever seniority, who contravenes this policy.

The Company will not tolerate retaliation against or victimisation of any employee involved in the bringing of a complaint of harassment or bullying under the Company's procedure. Such retaliation or victimisation will itself constitute a disciplinary offence, which may in appropriate circumstances lead to dismissal.

Senior management of the Company is fully committed to this policy

4.2 What is harassment?

Harassment means words or behaviour which -

- are based on the "Protected Characteristics" of another person
- are unacceptable and unwanted by the person feeling harassed, and create an intimidating, humiliating, or offensive working environment for the person who is the target of the words or behaviour.

Harassment can take many forms. Examples of harassment prohibited by this policy include:

- verbal abuse or offensive jokes or pranks; lewd or suggestive comments; requests for sexual favours or repeated requests for dates;
- unnecessary body contact; threatened or actual assault or violence;

- deliberate exclusion from conversations or work activities on the basis of any of the “Protected Characteristics”.
- display of “*pin-ups*”, pornography, inflammatory or abusive literature or graffiti;
- using e-mail or the internet for the purpose of bullying or making abusive or offensive remarks related to a “Protected Characteristic”, or to send pornography or inflammatory literature.

This is not an exhaustive list. Some forms of harassment plainly constitute gross misconduct for the purposes of the Company’s disciplinary procedure and will normally merit summary dismissal. Examples of this category would be:

- threatened or actual sexual or racial assaults; and
- suggestions or threats by managers or supervisors that sexual favours or racial origins could affect someone’s job security or prospects.

Other forms of harassment may constitute gross misconduct depending on the circumstances of the case.

Employees should be aware that, as well as committing a disciplinary offence; an individual found by an employment tribunal to have harassed a fellow employee on the grounds of any of the “Protected Characteristics” in the course of their employment may be personally liable to compensate the victim. In addition, harassment for whatever reason may constitute a crime punishable in the Civil Court.

4.3 What is bullying?

Bullying is persistent behaviour directed against an individual or group of individuals which creates a threatening or intimidating work environment that undermines the confidence and self-esteem of the recipient/s.

Bullying can take many forms. Examples prohibited by this policy include:

- verbal abuse, such as shouting or swearing at colleagues;
- threatening or insulting colleagues;
- abusing power or using unfair penal sanctions;
- practical jokes, initiation ceremonies or birthday rituals;
- physical abuse such as hitting, pushing or jostling;
- rifling through, hiding or damaging personal property;

- ostracising or excluding colleagues from work events or social activities.

This is not an exhaustive list.

Bullying does not include appropriately conducted criticism of an employee's behaviour or job performance by management.

An employee can be bullied or harassed by a colleague or subordinate as well as by a manager or team leader.

It is important to recognise that what one employee may find acceptable, another may find totally unacceptable and that the essence of harassment and bullying is that the words or behaviour are unwelcome to the particular person who is the target of the words or behaviour. All employees must treat their colleagues with respect and appropriate sensitivity.

4.4 Responsibility of Employees, Supervisors and Managers

It is the responsibility of all employees to comply with this policy and the particular responsibility of supervisors and managers to ensure it is carried out, with a view to developing and maintaining a working environment at the Company in which harassment and bullying are understood by all to be unacceptable. To this end, all employees are expected to familiarise themselves with this policy and abide by its provisions. The Policy does not, however, confer contractual rights on individuals.

It is fully expected that all employees will act responsibly regarding this issue. False accusations of harassment or bullying can have a serious effect on innocent individuals. Therefore, should investigation show that a false accusation has been made in bad faith, appropriate disciplinary action, which could include dismissal, will follow. However, an employee who brings a complaint in good faith will not be subject to any detriment by the Company.

4.5 The Procedure

4.5.1 Introduction

Any complaint of harassment or bullying will be handled by the Company sensitively, in a timely and confidential manner. It is not considered appropriate for the Company's Grievance Procedure to apply to complaints of harassment or bullying.

The Company recognises the right of employees to determine for themselves whether the words or behaviour of others is acceptable to them and to bring a complaint in respect of harassment or bullying. Following the investigation of a complaint, the decision as to whether the complaint is warranted and, if so, what disciplinary sanction should apply is the responsibility of management.

Any records made of any action taken under this procedure will be treated as confidential.

4.5.2 Informal resolution

An employee who considers himself or herself to be the victim of harassment or bullying may, in some cases, be able satisfactorily to resolve the matter by explaining clearly to the perpetrator that their behaviour is unacceptable, contrary to the Company's policy and must stop. Employees may wish to ask a colleague to put this on their behalf or to be with them when confronting the perpetrator.

Employees are encouraged to seek the assistance of the HR Manager or their immediate manager when they want advice regarding appropriate steps to stop the harassment. Any such discussion will be strictly confidential.

If it is considered by the employee to be appropriate, the HR Manager or their immediate manager may seek to resolve the matter informally by indicating to the alleged perpetrator, without prejudging the matter, that there has been a complaint that their behaviour is having an adverse effect on a fellow employee; that any such behaviour is contrary to Company policy; that the continuation of such behaviour would, if substantiated, amount to a serious disciplinary offence and that their discussion is informal and confidential. If a complaint is resolved informally, the alleged perpetrator will not be subject to disciplinary sanctions. However, in exceptional circumstances and following consultation with the employee, the Company may decide that it is necessary to investigate further and take more formal action.

4.5.3 Formal complaints procedure

In the event that informal resolution of the matter is unsuccessful or considered inappropriate by the employee in the circumstances, the employee may make a formal complaint of harassment to the CEO or nominated deputy. In addition, the Company may decide that it is necessary to take more formal action. A formal complaint may lead ultimately to the imposition of disciplinary sanctions on the perpetrator. Should he or she choose to, the employee will be able to discuss his or her complaint at any stage of the procedure with the HR Manager or their immediate manager, or a fellow employee who the employee feels comfortable talking to.

Any complaint will be investigated promptly usually within 5 working days, impartially and, so far as practicable, confidentially.

The complainant will be asked to provide the following details: the name of the alleged harasser or bully, the nature of the harassment or bullying, the dates and times the harassment or bullying occurred, the names of any witnesses and any action taken by the complainant to resolve the matter informally.

Where the complainant and the alleged harasser or bully work in proximity to each other, it may be necessary to ensure they do not continue to do so whilst the complaint is being investigated and during any consequent disciplinary proceedings. This may necessitate that one or both parties be suspended on full pay.

Where the evidence gathered in the investigation indicates to the CEO or nominated deputy that a disciplinary offence has been committed, the Company's disciplinary procedure will be instigated and a disciplinary hearing under that procedure will be arranged to deal with the

alleged disciplinary offence. In accordance with that procedure, the alleged harasser or bully will be provided with relevant evidence about the allegations against him or her and will be given a full opportunity to respond.

5.0 DRESS CODE POLICY

Trumeter employees are expected to present a professional image at all times and to maintain an acceptable level of grooming and hygiene. Clothing worn should not be provocative or cause offence to those they have contact with. Any uniform and/or protective clothing issued to an employee must be worn as specified

6.0 DRIVING POLICY

This policy applies whether employees are driving company vehicles or own vehicles for work purposes. All employees must comply with traffic legislation, be conscious of road safety and avoid aggressive road behaviour. Employees must not drive when under the influence of drink, drugs or medication that affects driving. Adequate breaks must be taken when driving for long periods. Mobile phones must not be used while driving unless fitted with a hands free device. Any speeding tickets, accidents or breaches of traffic regulations must be reported to the line manager. Trumeter is not responsible for the payment of any speeding tickets, penalty charge notices or parking fines.

Smoking is not permitted in any company vehicle.

7. EMPLOYEE CODE OF CONDUCT

Employees are expected to behave in a professional, business-like manner at work, and whenever representing the company. Employees are accountable for any behaviour outside of work that has a negative impact on their ability to perform their Trumeter responsibilities.

Whilst Trumeter does not wish to dictate how employees conduct themselves in their personal lives outside work, any unlawful, anti-social or other conduct by employees which may jeopardise the Company's reputation or position will be dealt with through the disciplinary procedure.

Employees are obliged to give their full commitment to their duties and responsibilities whilst at Trumeter and therefore should not engage in activities outside of Trumeter that could impair their work performance. In addition, there must be no actual or potential conflict of interest between the employees' work/responsibilities and their involvement in any activity or employment (or self-employment) outside of Trumeter. Permission must be sought and obtained from the relevant director before engaging in any outside employment, whether paid or unpaid.

Employees must inform their line manager if they have a close personal relationship with another employee, or an employee of a client or customer of Trumeter, which could be considered by colleagues or others as impacting on the way they conduct themselves at work

8.0 EMPLOYEE DEVELOPMENT

8.1 Training and Development Policy Statement

The Company recognises that its employees are fundamental to its continued success and future growth. The Company also recognises the importance of training to enable its employees to achieve their full potential.

The objectives of the Company's Training and Development Policy are to:

- * Provide relevant induction training for all new employees, plus other basic training requirement to introduce them effectively into the Company and into their new position.
- * Provide Quality and Health and Safety training to ensure a safe working environment and that employees understand their responsibilities with respect to quality.
- * Maintain appropriate training programmes to assist employees to reach their potential and sustain an optimum level of performance
- * Provide training to allow employees to take advantage of promotional and career development opportunities.
- * Provide the necessary training to meet any current and future legislation.
- * To enable all of our employees to:
 - know and understand what the job requires of them
 - know how to do the job and why it is important to do it right
 - identify ways in which the job can be improved

In all cases the employee has the responsibility, together with their Manager and/or Supervisor, for their personal training and future development. Training plans will be agreed with the employee during the appraisal process which will be carried out annually.

8.2 One to One Discussions

One to One discussions are informal meetings between the employee and their Manager / Supervisor. There are no set guidelines regarding what has to be discussed and the employee should take the opportunity to mention anything that concerns them, such as progress within their job, goals or objectives, training plans or a review of training recently undertaken.

8.3 Opportunities and Progression

The Company is committed to the advancement of their employees within the Company, and will therefore encourage internal promotions whenever possible.

Details of any internal vacancies can be found on the notice boards and on the company website under the careers section. If any vacancy is of interest, the employee should contact their manager, who will be able to advise them of the application procedure. An application for an internal post will not jeopardise the employee's current position in any way.

As a general principle, recruitment will be based on ability, qualifications and experience and every effort will be made to maximise career development opportunities through internal recruitment.

8.4 External Training / Qualifications

Where an employee undertakes job relevant external training, or studies for a professional qualification, Trumeter may fund part or all of the associated fees. In the event that the employee chooses to leave up to two years after the completion of the course, the fees (or part thereof) may be deducted from any monies owed at that time.

Trumeter will normally provide an amount of paid leave to attend vocational or professional courses to equal the employee's own time invested in attending.

9.0 EQUAL OPPORTUNITIES POLICY

9.1 Policy Statement

The Company is an equal opportunity employer and is committed to a policy of treating all its employees and job applicants equally.

It is the policy of the Company to take all reasonable steps to employ and promote employees on the basis of their abilities and qualifications without regard to the "Protected Characteristics".

The Company will appoint, train, develop and promote on the basis of merit and ability alone.

Employees have a duty to co-operate with the Company to ensure that this policy is effective to ensure equal opportunities and to prevent discrimination. Disciplinary action will be taken against any employee who is found to have committed an act of improper discrimination. Serious breaches of the equal opportunities policy will be treated as gross misconduct.

Employees must not harass or intimidate other employees. Such behaviour will be treated as gross misconduct in accordance with the disciplinary procedure.

Employees should draw the attention of their immediate superior to suspected discriminatory acts or practices.

Employees must not victimise or retaliate against an employee who has made allegations or complaints of discrimination or provided information about such discrimination. Such behaviour will be treated as gross misconduct in accordance with the disciplinary procedure.

Employees should support colleagues who suffer such treatment and are making a complaint.

9.2 Sources of Recruitment

The recruitment process must result in the selection of the most suitable person for the job in respect of experience and qualifications.

9.3 Advertisements

- Recruitment publicity must positively encourage applications from all suitably qualified and experienced people.
- When advertising job vacancies, in order to attract applications from all sections of the community, the Company will, as far as reasonably practicable:-
 - ensure advertisements are not confined to those areas or publications which would exclude or disproportionately reduce the numbers of applicants from any of the “Protected Characteristics”;
 - avoid prescribing any unnecessary requirements which would exclude a higher proportion from any of the “Protected Characteristics”;
 - publicise vacancies that may be filled by promotion or transfer, to all eligible employees in such a way that they do not restrict applications from employees of any of the “Protected Characteristics”;
 - not recruit new employees solely on the recommendation of an existing employee;

9.4 Selection Methods

The selection process will be carried out consistently for all jobs at all levels. The Company will ensure that this Equal Opportunities Policy is available to all staff and in particular is given to all staff with responsibility for recruitment, selection and promotion.

The selection of new staff will be based on the job requirements and the individual's suitability and ability to do, or to train for the job in question.

9.5 Selection Tests

Selection tests will measure the individual's actual or inherent ability to do or to train for the position. Thus, questions or exercises on matters which may be unfamiliar to anyone from the “Protected Characteristics” will not be included in the tests if they are unrelated to the requirements of the particular job.

The tests that are used will be reviewed from time to time in order to ensure that they remain relevant and free from any unjustifiable bias, either in content or in scoring mechanism.

9.6 Applications and Interviewing

The staff responsible for short-listing, interviewing and selecting candidates will be clearly informed of the selection criteria, and of the need for their consistent application.

Wherever possible, all applicants will be interviewed by at least two people, either together or separately.

All questions that are put to the applicants will relate to the applicants ability to meet the requirements of the job.

If it is necessary to assess whether personal circumstances will affect the performance of the job (for example, if the job involves unsociable hours or extensive travel) this will be discussed objectively, without detailed questions based on assumptions about any of the “Protected Characteristics”.

9.7 Promotion, Transfer and Training

The Company will take such measures as may be necessary to ensure the proper training, supervision and instruction for all managers in order to familiarise them with the Company's policy on equal opportunities, and in order to help them identify discriminatory acts or practices and to ensure that they promote equal opportunity within the departments for which they are responsible.

All persons responsible for selecting new employees, induction or promotion training, or for transfer to other jobs, will be instructed not to discriminate against the “Protected Characteristics”.

Where a promotional system is in operation, the assessment criteria will be examined to ensure that they are not discriminatory.

When a group of workers predominantly of one of the “Protected Characteristics”, is excluded from access to promotion, transfer and training and to other benefits, the promotional system will be reviewed to ensure that there is no unlawful, indirect discrimination.

Where general ability and personal quality are the main requirements for promotion to a post, care will be taken to consider all favourable candidates with different career patterns and general experience.

9.8 Terms of employment, benefits, facilities and services

All terms of employment, benefits, facilities and service will be reviewed from time to time, in order to ensure that there is no unlawful discrimination on the grounds of the “Protected Characteristics”.

9.9 **Grievance, disputes and disciplinary procedures**

All allegations of discrimination will be dealt with seriously, confidentially and speedily.

The Company will not ignore or treat lightly grievances or complaints from members of a “Protected Characteristic”, on the assumption that they are over sensitive about discrimination.

9.10 **Monitoring equal opportunity**

The Company will regularly monitor the effects of selection decisions and personnel practices and procedures in order to assess whether equal opportunity is being achieved.

The Company will, from time to time, look at:-

- the composition of the work force of each department with respect to the “Protected Characteristics”, and changes in distribution over periods of time;
- the selection decisions for recruitment, promotion, transfer and training, with respect to the “Protected Characteristics”, and the reasons for those decisions.

The Company will, from time to time, review the selection criteria and personnel procedures to ensure that they do not include requirements or conditions which constitute, or may lead to, unlawful indirect discrimination.

10.0 **HEALTH & SAFETY AT WORK**

10.1 **Health and Safety Policy**

The company takes the Health and Safety of all employees very seriously, and is prepared to devote whatever time and resources are needed to ensure that all Health and Safety risks are eliminated or mitigated, and that all employees are educated about and protected from any hazards. Specifically, the Company will

- Provide adequate control of any health and safety risks
- Consult with employees on matters affecting their health and safety
- Provide and maintain safe plant and equipment
- Ensure safe assessment, handling and use of substances
- Provide information, instruction and education for employees in Health and Safety matters

- Ensure all employees are competent and adequately trained to carry out their job function
- Provide personal protective equipment (PPE) wherever necessary
- Pro-actively work to prevent accidents and cases of work-related ill health
- Maintain safe and healthy working conditions
- Review and revise this policy as necessary at regular intervals.

Employees should ensure they read the full H&S Policy available in Q Pulse, and have a duty to co-operate with the Company to ensure that the policy is effective and to offer all necessary assistance to ensure the health and safety at work of all employees.

The attention of all employees is drawn to the safety rules and procedures. Disciplinary action will be taken against any employee who violates these rules and procedures.

10.2 Personnel Responsible for Health and Safety

The person having overall responsibility for health and safety will be John Smith, Chief Executive

The Health & Safety Officer is Yvonne Massey.

Medical assistance will be provided at each office. The names of those qualified in first aid will be notified to the employees from time to time and posted on relevant noticeboards.

10.3 Safety rules

10.3.1 Signing In

The Weekly Attendance / Fire Register must be completed daily by every employee, and accuracy and completeness are essential as this list will be used as a register in case of fire or evacuation for any reason.

Please note that the names on the sheet appear in alphabetical order by Christian name, there is a tick box for IN and OUT for the morning and the afternoon portion of each day of the week. **EMPLOYEES MUST NOT TICK THE OUT BOX AT LUNCHTIME IF STAYING ON SITE.**

10.3.2 Fire

Employees should ensure that they are familiar with the position of the nearest fire-fighting equipment, alarms and emergency exits. Each employee is responsible for reading and understanding the instructions for use on the fire extinguisher(s) located nearest to their workplace. . In particular, employees are required to use electric fires and other heaters with caution (if and where permitted) and to keep flammable materials, in particular paper, away from sources of heat. Employees should report any faulty electric cable or flex

immediately. Emergency exits, stairs, corridors and doorways should not be obstructed and Fire doors should always be kept closed.

Employees should be fully conversant with the fire drill and be aware of the nearest fire exit and assembly points. Employees should leave the building quickly and in an orderly fashion following the correct route. Fire Wardens will take charge when an emergency situation occurs.

10.3.3 Workplaces

Workplaces must be kept clean and tidy with rubbish and discarded materials placed in the receptacles provided. Proper attention must be paid to hygiene. All materials must be properly and safely used and when not in use properly and safely secured. Care must be taken to ensure that the workplace is not hazardous either to employees or to third parties including trespassers.

10.3.4 Desks

The company operates a clean desk policy. This means that at the end of every working day, each employee's desk should be clear of everything other than one pile of papers, and appropriate storage utensils such as pen holders, in trays etc. All other items should be stored in an employee's desk or other organised area.

10.3.5 Smoking

Smoking is prohibited at all times in our offices and company vehicles. There is a smoking shelter provided in the Imperial House car park for those who do smoke. This facility may only be used at recognised break times.

For health reasons, Trumeter encourage employees to stop smoking and recommend seeking smoking cessation advice from either <http://smokefree.nhs.uk/> or through face to face sessions at the local NHS Stop Smoking Service who can be contacted on 0845 223 9001.

In an effort to help employees stop smoking, Trumeter will (once per employee):

- allow up to five hours off to attend any course that will help smokers to quit
- Match fund the cost of nicotine replacement products such as patches, gum or inhalers up to a maximum of £35 on production of valid VAT receipts.

10.3.6 Electrical Equipment

Any equipment in a dangerous or worn condition must be reported by the employee to the H&S Officer. All electrical equipment that does not require continuous operation should be switched off when not in use and plugs removed from socket outlets. Employees should never use equipment that is suspected to be faulty, or where the cable or flex is damaged or connections are loose. Any faults should be immediately reported to the H&S Officer.

Employees should not attempt to repair or interfere with electrical equipment or wiring themselves, and should not use dual or other socket outlets unless these have been properly authorised by an electrical engineer.

Employee's own equipment should not be used on the premises unless properly tested.

10.3.7 PAT Testing

Trumeter recognises it has statutory responsibilities as an employer to ensure safe practices and a safe environment in accordance with the Health and Safety at Work Act 1974, the Electricity at Work Regulations 1989. Trumeter will take all reasonable steps to ensure that all portable appliances are tested as appropriate by a competent person and a record of tested equipment will be held on Q-Pulse. Each employee using electrical equipment has a duty to visually inspect the appliance prior to use.

10.3.8 Floors

Cables and wires should not be permitted to trail across the floor where people may be passing, unless a covering is provided. Employees should take extra care on newly polished or wet floors. Any liquid spilt on the floor should be wiped up immediately. Damaged floor covering or surfaces should be treated with care and reported immediately.

10.3.9 Ladders, Steps and Stairs

Where ladders or steps are used to reach above normal height, employees should ensure that they are firmly based and secure. Where necessary, assistance should be sought to prevent them slipping. Employees should exercise care on stairs and handrails should be used.

10.3.10 Alcohol and Drugs

No alcoholic liquor or drugs (other than those prescribed by a registered medical practitioner and which do not affect the employee's ability to safely undertake his duties) may be brought on to, used or consumed at any workplace. Any employee who, in the opinion of the Company, is under the influence of drugs or alcoholic liquor will be suspended by the Company and appropriate disciplinary action will be taken against the employee under the terms of the Company's disciplinary procedure, which may lead to dismissal.

10.3.11 House keeping, Access and Egress

Means of access to and egress from the work place must only be used for the purpose for which they are provided. No employee must tamper with any means of access to or egress from the work place. Any means of access to or egress from the work place which is in a dangerous or unsuitable condition for use must be reported by employees to the H&S Officer.

Employees are expected to maintain good standards of housekeeping. Poor standards often cause 'slips, trips or falls' and are consequently one of the most common causes of accidents and injury at work. Many workplace fires are either caused or made worse by poor housekeeping standards.

We recognize the need to ensure that good standards of housekeeping are achieved and maintained at all times and a policy of 'clean up as you go' will always be the preferred option.

We all have a responsibility not to obstruct walkways and to report any hazardous situations to the H&S Officer.

10.3.12 Carrying Heavy Items

Lifting or carrying items such as IT equipment, heavy bundles of papers or files should be done carefully. Employees should ask for assistance if there is any danger of strain. Heavy objects should be lifted in the correct manner without bending the back. Every employee is expected to understand and be able to assess the risk of any task *prior* to doing it

10.3.13 Manual Handling

Our policy is to reduce the risk of manual handling injuries as far as is practicable and to provide guidance to our employees on the measures that should be taken to ensure safe lifting and carrying.

Employees should ensure that they have read and understood The Manual Handling policy which can be found in Q Pulse.

Risk Assessments of Manual Handling and Lifting tasks will be undertaken and reviewed on a regular basis.

10.3.14 Personal Protective Equipment

Personal Protective Equipment (PPE) is defined as equipment which is intended to be worn or held by a person at work and which protects employees against one or more risks to their health and safety. Our policy is to supply PPE only when the risks to health and safety cannot be adequately controlled in other ways and this will be determined jointly by the appropriate department manager and H&S Officer. Once supplied to an employee, PPE must be worn at all times when carrying out the work activities. Failure to do so will result in disciplinary action being taken under the Company's disciplinary procedure and the employee may be dismissed.

10.3.15 Display Screen Equipment

The Company acknowledge that health and safety hazards may arise from the use of Display Screen Equipment (DSE) and it is our policy to ensure that any risks are reduced to a minimum. To this end, we will monitor the health and safety of users, initially by carrying out an assessment of the risks.

All employees who habitually use VDU's as a significant part of their normal work will be reimbursed (upon submission of a valid receipt) for one normal sight test every two years, to be conducted by an optometrist or doctor. If the optometrist or doctor specifies that the employee should be tested again within two years, then a letter to that effect must be submitted to the Company.

Should spectacles be required, the Company will reimburse the employee (on submission of a valid receipt) up to a maximum of £100, once in every two years, to assist with the spectacles and eye examination.

10.3.16 Accident or Illness at Work

Any accident or illness occurring on the Company's premises should be reported to the H&S Officer/line Manager who should ensure that all details are entered in the accident report book. It is important that all injuries however slight should be reported. Failure to report an accident or safety incident will be considered a disciplinary offence.

If a client is involved the employee must not in any way admit liability on behalf of himself, other employees or the Company.

Employees should ensure that they know the names and locations of the persons designated to take charge of the first aid kit and to render first aid in an emergency. In an emergency, if speed is considered essential, an ambulance should be called.

In the event that any accident or illness occurs whilst an employee is working on customer/suppliers premises, this should be reported to the site H&S officer and also to Trumeter's H&S Officer for entry into both accident report books.

10.3.17 Water Supply

Employees must not discharge any substance into the drains. Advice must be obtained from H&S Officer who will follow the special regulations governing such matters.

10.3.18 General

Employees must not engage in any horseplay or misuse any equipment or misuse anything provided in the interest of health and safety. Any employee who fails to follow this rule will be subject to disciplinary action under the Company's disciplinary procedure and may be dismissed.

Employees should remain alert and report any practices they observe which in their opinion could constitute a hazard to themselves or others. Where additional rules are issued to employees in relation to machinery or operations which they carry out, these additional rules must be carefully complied with.

Employees should take particular care when visiting or working temporarily in other work places where they may not be familiar with the hazards present and applicable health and safety rules.

SECTION 2

11.0 ABSENCE - SICKNESS

11.1 Notification of Absence.

If absent from work as a result of sickness the employee should notify the HR Manager as early as possible on the first day of absence by telephoning the Company. The same rule applies for absence for any other reason.

If notification to the Company is not made on the first day of absence, any absence may be treated as unauthorised.

If absent because of illness, failure to notify the Company may result in payment of some Company Sick Pay (CSP) / Statutory Sick Pay (SSP) being withheld. On return to work, the employee will be expected to attend a 'Back-to-Work' interview

11.2 Payment during sickness and/or injury

SSP regulations (including payment rates) are set by the HMRC - Current regulations are available from the HR Manager on request. SSP qualification days for all employees are Monday to Friday inclusive.

11.3 Payment of Company Sick Pay

For the rules surrounding eligibility for payment of Company Sick Pay please refer to details in section 1 - 1.2.3

11.4 Rate of Company Sick Pay

For the rate of Company Sick Pay please refer to details in section 1 – 1.2.4

11.5 Self-Certification Forms and Doctor's Statements

For details of when to submit self certification forms and doctor's statements please refer to section 1 – 1.2.5

11.6 Return to Work

Having been away from work due to sickness absence (or on any other occasion without prior authorisation), employees must report to their Manager before commencing work. A Company Self Certification form (SC1) must also be completed if not already done.. All employees returning from sickness absence will have a return to work interview with their Manager (see Absence procedure 1.2.7).

12.0 ABSENCE - OTHER

12.1 Bereavement Leave

Two days special paid leave will be granted to cover death of immediate family. Immediate family is - Husband, Wife, Spouse, Children, Mother and Father

The company reserves the right to see a copy of the death certificate when bereavement leave has been paid.

12.2 Unpaid Leave of Absence

If unpaid time off work for any reason is required, application through the Manager should be made who will assess each case individually. In general, leave of absence will not be granted unless all holiday entitlement has been exhausted and then only in exceptional circumstances.

12.3 Medical/Dental Appointments

For visits to a Doctor or Dentist, appointments should wherever possible be made outside of normal working hours. The Company will, however, on production of an appointment card, allow unpaid absence for attendance of such appointments or allow time to be made up within the same week.

12.4 Public Duties

The Company will allow reasonable unpaid time off for the execution of public duties, for example Justice of the Peace, members of Statutory Tribunals, and members of a Local Authority.

12.5 Jury Service

Employees called for jury service must provide a copy of the “confirmation of jury service” letter to their Manager / HR Manager immediately upon receipt..

Trumeter will not refuse leave for jury service, however we may ask that the employee requests for it to be deferred if it is felt that the absence would have a serious effect on the business. As there is a time limit on such requests to the court, this possibility must be discussed with the Manager / HR Manager as soon as is practicable, and in any event, prior to returning the jury forms to the relevant authority.

Trumeter will not pay the employee for the time off taken to serve as a juror. The “Certificate of Loss of Earnings” in the juror’s pack needs to be given to the HR Manager for completion, as soon as possible. Payment for travel and food or subsistence expenses are to be claimed by the employee from the court. It is the responsibility of the employee to ensure that the attendance claim is made to the court within the specified timeframe.

Providing the employee claims in time to the court, The Company will make a payment to the employee in addition to the attendance claim, to make up the sum to meet the normal contractual pay. This payment will be made with the next payroll payment direct into the employee’s bank account.

13.0 ALCOHOL & DRUGS POLICY

This policy has the full support of the Company's senior management. Its operation and effectiveness will be kept under regular review. The policy is intended as guidance for management and employees. It does not confer any contractual rights on individuals.

13.1 The purpose of the policy

There is clear link between misuse of alcohol and drugs and reduced safety and efficiency. The purpose of this policy, therefore, is -

- to ensure that employees' use of drugs or alcohol does not affect the health and safety of the individuals themselves, their fellow workers or others with whom they come into contact in the course of their work
- to ensure that employees' use of drugs or alcohol does not affect the efficient and effective operation of the Company's business
- to set out the Company's rules on drugs, alcohol and substance abuse
- to provide a procedure whereby employees who have a problem of drug or alcohol misuse or substance abuse can seek and be offered help in confidence
- to provide guidance on the effects of drugs and alcohol and the symptoms of drug and alcohol misuse and substance abuse

13.2 Application

The Company's policy applies to all its employees and to everyone employed at its premises, including any contractors working on the premises.

13.3 The Company's rules on alcohol and drugs at work

The Company's policy is that the working environment should be free from the influence of drugs or alcohol. This will help to ensure the health and safety of its employees and others with whom they come into contact, to maintain the efficient and effective operation of the business, and to ensure our customers receive from us the service they require. For those reasons, the following rules will be strictly enforced.

No employee or contractor shall -

- report or try to report for work when unfit* due to alcohol or drugs (whether illegal or not) or to substance abuse
- be in possession of alcohol or illegal drugs** in the workplace
- consume alcohol or illegal drugs or abuse any substance whilst at work.

Subject to what follows, employees may consume alcohol at Company functions where such consumption has been authorised by senior management. Such functions will where possible be arranged at times so that employees do not have to return to work having recently consumed alcohol. This exception to the normal rule does not excuse drinking to excess or so as to create a safety risk.

*Whether an employee is fit for work is a matter for the reasonable opinion of management.

**Illegal drugs include but are not limited to heroin, cannabis/marijuana, cocaine, ecstasy and amphetamines.

Contravention of these rules is a very serious matter and the Company will take disciplinary action, which may well include dismissal, in the event of infringement. See below. In addition, possession of or dealing in illegal drugs on Company premises will, without exception, be reported to the Police.

13.4 **Disciplinary action**

Where an employee contravenes the Company's rules stated above, that contravention will be dealt with under the Company's disciplinary procedure.

However, the Company's disciplinary procedure may be suspended for a reasonable period pending investigation of whether the employee has a medical problem amenable to treatment and, if so, for that treatment to be undertaken.

Whether the disciplinary procedure is suspended will depend on -

- the nature of the employee's alleged offence
- the evidence that the employee has a health-related problem;
- the employee's willingness to be treated.

Employees who decline to undergo appropriate treatment, or who discontinue treatment before its satisfactory completion, will be subject to the normal disciplinary procedure.

13.5 **Help available**

The Company will endeavour to ensure that advice and specialist help are made available to any employee who feels they have a problem with alcohol or drug misuse. Any employee who seeks the assistance of the Company in finding treatment for a drugs or alcohol problem has the Company's complete assurance of confidentiality.

Early identification and treatment is essential if problems for the employee and for the Company are to be avoided. Employees who feel they have a problem are encouraged to come forward and seek assistance. Employees who wish to seek help and advice should contact the HR Manager or their immediate manager who will arrange for the employee to have a counselling meeting at which options available to the employee will be explained and agreed, which may include a course of treatment or rehabilitation.

During any period of absence from work for agreed treatment, the Company's normal sick pay arrangements will apply and absence for treatment will be treated as normal sickness.

In the event that an agreed or recommended course of treatment is not followed by an employee or is ineffective, lapses in the employee's performance, conduct or attendance will be dealt with in accordance with the Company's normal disciplinary or sickness absence procedures as appropriate. This includes any matter arising prior to the disciplinary procedure being suspended.

Employees who are concerned that a colleague is exhibiting symptoms of an alcohol or drug-related problem should notify their Manager/Supervisor. Their comments will be handled in a confidential manner. Employees making false accusations in bad faith will be subject to appropriate disciplinary action, which could include dismissal.

13.6 Action by Managers and Supervisors

Managers should keep accurate records of instances of poor performance or other problems which may be related to a drugs or alcohol problem.

Where a Manager suspects an employee may have a problem with alcohol or drugs that is affecting his or her work performance, as opposed to suspecting the employee of being guilty of a single instance of drug - or alcohol - related misconduct (which will be dealt with under the disciplinary procedure), he or she will initially hold an informal counselling discussion with the employee to ascertain whether the employee's poor performance is related to alcohol or drugs or a health issue and to offer the Company's assistance. If the employee does not accept this offer of assistance, he or she should be advised to discuss the matter with a colleague or a family member. If the employee then fails to accept the offer of assistance, his or her performance, conduct or attendance will be dealt with in accordance with the normal Company disciplinary or sickness absence procedure as appropriate. If the employee accepts the offer, a counselling meeting will be arranged as in 13.5 above.

14.0 ANTI-BRIBERY POLICY

Trumeter Technologies Limited is committed to the highest standards of ethical conduct and integrity and strives to undertake our business fairly with honesty and transparency. This is reflected in every aspect of our business affairs.

The action and conduct of Trumeter's Directors and Employees as well as others acting on Trumeter's behalf are essential to maintaining these standards. To that end all Trumeter personnel, including agents, consultants and contractors as well as suppliers involved in Trumeter international business must read, become familiar and comply with this Anti Bribery Policy, including any future updates that may be issued from time to time.

14.1 Compliance with Anti-Bribery Laws

It is Trumeter's Policy to comply with all laws, rules, and regulations governing anti bribery and corruption law, in all the countries where we operate. Trumeter has a zero tolerance approach to acts of Bribery and corruption, by employees or anyone acting on our behalf. Any

breach of this policy will be regarded as a serious matter by the Company which is likely to result in disciplinary action.

Under UK law (UK Bribery Act 2010), bribery and corruption is punishable for individuals by up to ten years imprisonment. If the company is found to have taken part in the corruption or lacks adequate procedures to prevent Bribery, it could face an unlimited fine and, be excluded from tendering for Government contracts and face untold damage to its reputation.

- The payment or offer to pay bribes, or provisions of, or offer to provide gifts or anything of value for improper purposes, to obtain or retain business or any other benefit, (whether for Trumeter or any other party) is prohibited. Such payments or gifts are also forbidden under the terms of this policy and may result in immediate dismissal for those involved in their payment or receipt.
- Trumeter keeps financial records and has appropriate internal controls in place which will evidence the business reason for making payments to all third parties.

14.2 Application of the Policy

This policy applies to individual employees, agents, sponsors, intermediaries, consultants or any other people or bodies associated with Trumeter or any of its subsidiaries and employees. Bribery is committed when an inducement or reward is provided, in order to gain any commercial, contractual, regulatory or personal advantage for Trumeter or another party. No bribes of any sort may be paid or accepted from customers, suppliers, politicians, government advisors or representative's private person or Company. It is not permitted to establish accounts or internal budgets for the purpose of making facilitation bribes or influencing transactions (slush funds).

Trumeter recognise that to refuse a gift in certain circumstances and/or countries would cause offence to our trading partners. The test to be applied in all circumstances is whether the gift or entertainment is reasonable and justifiable. What is the intention of the gift? Is the gift being offered for something in return (quid pro quo). This policy does not prohibit practices that are customary in a particular market, or are appropriate and properly recorded. , such as normal and appropriate hospitality (given or received) and the giving of ceremonial gifts on a festival or at another special time, up to and not exceeding the value of £100.

14.3 Employee Responsibility

The prevention, detection and reporting of bribery is the responsibility of all Trumeter employees.

If an employee becomes aware that an activity or conduct which has taken place, which is suspected to be a bribe (or corrupt), this must be reported at once to their immediate Manger or the HR Manager.

15. BENEFITS PROGRAMMES

All benefits are discretionary and can be amended or withdrawn at any time by the Company.

15.1 Pension Scheme

Trumeter Technologies Limited gives employees access to a Group Personal Pension (which complies with the new pension legislation) after successful completion of a probationary period. The Company will contribute 8% of salary providing the employee contributes 6% of salary. Further details can be obtained from the HR Manager.

15.2 Death in Service Scheme

Trumeter Technologies Limited operates a Death in Service Scheme applicable to employment, up to age 65. Under the scheme, the nominated beneficiary/ies will receive 4 times salary in the event of death whilst employed by the Company.

16.0 COMPANY RULES

Many of our Company Rules have already been discussed throughout this handbook. Although not exhaustive, the list below provides a summary of the main rules which apply to all individuals during their employment with the Company.

1. Employees must at all times comply with reasonable requests of the Company.
2. Employees must not consume alcohol or illegal substances, or be under the influence of alcohol or illegal substances whilst working for the Company.
3. Unauthorised software must not be loaded onto the Company computer system; electronic mail attachments or discs used on PC's at home or being supplied from other companies must be virus checked by the IT Manager prior to being loaded or opened on the Company system. No company computer hardware may be modified or repairs attempted by unauthorised personal. No settings, such as network port settings, may be altered by unauthorised personnel.
4. Employees must not cause wilful damage to any property, whomsoever its owner, and must report any damage of which they are aware to their immediate Manager.
5. Employees must not wilfully contaminate product and must report any possible breach of product security/confidentiality/integrity of which they are aware to their Manager.
6. There must be no abuse, bullying or harassment at any time, either verbally or physically of any other person, whether or not that person is an employee of the Company, when working for the Company. Employees must comply at all times with the Company Equal Opportunities and Dignity at Work policies.
7. The Company will not tolerate the theft of its property, or of the property of another employee.
8. The Company must be notified by an employee if they receive gifts (either for a single item or multiple items) from suppliers, customers, etc. which exceed £100 in value.

9. Employees must at all times comply with and respect the Company's obligations as a manufacturing and service Company with regard to its customers, its employees and subcontractors/suppliers.
10. There must be no fraud, or falsification of records or other behaviour which attempts to defraud the Company or others. This includes falsifying expense claims or interference with time recordings. It also includes providing false information or failing to disclose relevant information during application for employment.
11. There must be no involvement in secondary business activities on Company premises.
12. Employees, visitors or contractors must have authorisation from a Director, prior to using a camera on site (Except for the use of the company's own cameras on official company business). In an emergency situation, such as recording details of a serious accident, the prior approval may be waived.
13. Persistent lateness and absence will be subject to disciplinary action, as specified in the Absence Control Policy. The Company will take disciplinary action against any employee who is absent from work without permission or who does not comply with the procedures.
14. During working hours, employees are not permitted to leave their place of work, or premises, for reasons other than those associated with work without obtaining their Manager's permission.
15. The posting of notices, of any nature, within the Company must have the prior consent of a Director or the HR Manager.
16. The Company premises may not be used for unauthorised meetings.
17. Collections, for any purposes other than for employee gifts, recognised charities or refreshments, may not be made unless specifically sanctioned by a Manager or Director.
18. Employees are not allowed to buy and sell, or conduct any private business deals on Company premises.
19. All accident, injuries and "near misses" must be reported to line Manager/HR Officer. Where there is personal injury or a "near miss", a report must be entered into the Company Accident Book.
20. Employees must at all times comply with good safe practice and make full use of all safety procedures and equipment where it is deemed necessary for their own individual or colleagues' protection.
21. All employees are required to maintain the standards that are expected in relation to quality and quantity of their work.

22. Employees must enter and leave the premises through the official and authorised entrances, completing the The Weekly Attendance / Fire Register as appropriate. Fire exits must not be used other than for emergency evacuation.
23. Employees shall at all times carry out their duties in a lawful, honest, competent and efficient manner.
24. The Company operates a strict no smoking policy. Employees and visitors must only smoke within the designated areas.
25. Only authorised and trained persons are permitted to deal with faults in electrical apparatus, which includes wires, switches, plugs etc. All such faults must be reported to line Manager or other authorised person. Electrical panels may only be accessed by engineers or fully trained personnel.
26. Employees must correctly wear the protective clothing provided for their job.
27. It is an express condition of employment that, at all times, employees comply in full with the requirements of the Employee Confidentiality Agreement (if issued as an appendix to the Contract of Employment) and in addition do not, through their acts or omissions, breach or put at risk the reputation, ethical values or security of the Company.
28. Employees must not divulge Company confidential information to external sources for any purpose. Confidential information includes (but is not restricted to) trade secrets; information concerning operations, dealings, transactions; research and development projects; sales statistics, prices, volumes; clients/suppliers contact details, purchase prices or volumes.
29. Animals are not allowed on Company premises.
30. Gambling and gaming are forbidden on Company premises
31. Employees are required at all times to comply with the policies issued to them for example: Health and Safety and Expenses & Travel Policy (where applicable).

17. **DISCIPLINARY PROCEDURE**

17.1 **Purposes**

The purposes of this procedure are:-

- to ensure consistent and fair treatment of disciplinary and performance issues;
- to help encourage employees to achieve and maintain appropriate standards of conduct and performance.

17.2 General principles

The following sets out the Company's current procedure for the handling of disciplinary matters. It does not confer any contractual rights.

1. The procedure applies to all employees.
2. Management may deal with minor instances of misconduct and initial unsatisfactory levels of performance informally, by use of counselling or informal caution.

If a problem continues or management judges it to be sufficiently serious, this procedure will apply.

3. The Company will not dismiss any employee for a first offence, unless the first offence amounts to gross misconduct (see below) in which case the employee will be dismissed without notice or pay in lieu.
4. The Company will not take any formal action under this procedure without appropriate prior investigation and without giving the employee an opportunity to put his or her case in respect of the allegations made.
5. Employees have the right to appeal against any formal action taken against them under the procedure.
6. Depending on the seriousness of the misconduct or poor performance and/or the employee's prior disciplinary record, the first level of the procedure may be omitted.
7. This procedure will be amended from time to time to ensure its continuing effectiveness and relevance, and to take account of any future Company Policy.

17.3 Conduct of meetings under the procedure

The following will apply to all types of disciplinary situations, i.e. in cases of both misconduct and gross misconduct.

1. In any proceedings under the procedure, an employee has the right to be accompanied by a fellow employee or trade union official of his or her choice
2. An employee who is requested to attend a meeting under this procedure will be informed whether the meeting is investigatory or disciplinary. Where the meeting is disciplinary, the nature of the allegation will be explained to the employee and he or she will be given time to prepare his/her case, together with any representative. (see 1 above).
3. Meetings will be conducted by the appropriate level of management.
4. The employee will have the opportunity to put his/her case, personally or via his/her representative, and in certain circumstances to call and question any witnesses.

5. Any disciplinary meeting may be adjourned to enable further investigation of matters arising to be carried out.

17.4 **Gross Misconduct**

The following are examples of conduct falling within the definition of gross misconduct and which entitle the Company to dismiss without notice or payment in lieu of notice -

- Serious breaches of the Equal Opportunities policy
- Refusal to accept and act on reasonable instructions from an employee's manager or other member of management
- Serious negligence that could or does result in unacceptable loss, damage or injury.
- Fighting, assault or threatening behaviour.
- Smoking in Prohibited areas.
- Theft, fraud, falsification of Company records or any dishonesty involving the Company, its employees, customers or authorised visitors or attempts to commit such offences.
- Deliberate or reckless damage to the property of the Company, its employees, customer or authorised visitors.
- Being under the influence at work of alcohol or illegal drugs.
- Unauthorised entry to computer records / disclosure of confidential information.

The above list is NOT exhaustive but illustrates the type of transgression that normally merits dismissal for a first offence. Other types of offences, such as harassment, may be treated as gross misconduct, depending on the seriousness of the particular facts.

If an employee is accused of gross misconduct, he or she may be suspended on full pay for a short time to enable investigations to take place.

If the Company is satisfied, following investigation and a disciplinary hearing, that the employee has committed gross misconduct, the Company will normally dismiss the employee without notice or pay in lieu.

17.5 **Other misconduct**

In other cases other than gross misconduct, , there will normally be no dismissal for a first offence. Instead, the Company may issue a warning to an employee which may be a formal or final warning, as appropriate.

17.5.1 Informal Counselling

In many cases such matters can be dealt with by arranging an informal counselling meeting with the employee. It should be noted however that some cases may be so serious as to skip this informal stage.

17.5.2 Formal warning

If conduct or performance does not meet the Company's standards, the employee may receive a formal warning, normally from their Manager or nominated deputy. Where, following the disciplinary meeting, the Manager decides to issue such a warning, he or she will inform the employee of the following:-

- the reason for the warning,
- that it is the first stage of the Company's disciplinary procedure,
- the action or improvement (if any) which he or she requires of the employee,
- if appropriate, the timescale for implementing any such action,
- the consequences for the employee of not implementing required action or of further misconduct,
- when the warning will cease to have effect. This will normally be after 6 months but a longer period may be stated in exceptional cases.
- the right of appeal.

All of these matters will be confirmed to the employee in writing.

17.5.3 Final warning

The Company may issue a final warning if -

- the required improvement is not achieved within the timescale (if stated) in a formal warning; or
- further misconduct or poor performance takes place, whether or not involving a repetition of the conduct or poor performance which was the subject of the formal warning; or
- the seriousness of the misconduct or poor performance merits it.

A final warning may be issued by the employee's Manager or nominated deputy. As with formal warnings, where, at the conclusion of the disciplinary meeting, the Manager decides to issue a final warning he or she will inform the employee of -

- the reason for final warning,
- the action or improvement (if any) which he or she requires of the employee,
- if appropriate, the timescale for implementing any such action,
- that the next stage of the procedure will be dismissal,
- when the warning will cease to have effect. This will normally be after 12 months but a longer period may be stated in exceptional cases.

- the right of appeal.

All of these matters will be confirmed to the employee in writing.

17.6 Dismissal

The Company may dismiss an employee where:

- the required improvement is not achieved within the timescale stated in a final warning; or
- further misconduct takes place, following a final warning - whether or not involving a repetition of the conduct which was the subject of any previous warning; or
- it is reasonably believed that the employee has committed an act of gross misconduct.

The employee will be dismissed with notice, unless dismissal is for gross misconduct.

A company director or nominated deputy may dismiss an employee. Where, at the conclusion of the disciplinary meeting, the director or manager determines to dismiss the employee, he or she will state the reason, the date on which the dismissal takes effect and inform the employee of his/her right of appeal. These matters will be confirmed in writing.

In exceptional circumstances, the Company may offer the employee an alternative to dismissal such as demotion and/or suspension without pay. Where this is deemed appropriate, a final warning may also be issued or continued in force.

17.7 Appeals

Any employee who is dissatisfied with any disciplinary decision taken in respect of him or her may appeal against that decision. Appeals should be in writing, setting out the reasons for the appeal, and should be delivered to the CEO within seven working days of the disciplinary decision. Appeals will normally be heard within five working days by the CEO or a Director independent of the disciplinary decision made.

The decision on the appeal will be communicated to the employee orally and in writing within seven working days.

18.0 EMPLOYEE FACILITIES AND SERVICES

18.1 Sickness or Injury and Medical Services

The Company recognises its responsibilities for the health, safety and welfare of all its employees. In the event that any member of the workforce should develop a life-threatening illness, it will take all reasonable steps to safeguard that person's employment and welfare.

If an employee suffers injury at work, however slight, they should obtain proper medical treatment at once and ensure that the accident is reported. Failure to report an accident may cause loss of benefit if they are absent from work due to the accident at some later date. The accident book is kept in the Administration Office with the First Aid Box.

The Company will provide transport to take an employee to hospital if an injury is sustained at work.

18.2 Suggestions

The prosperity of all employees depends upon the future prosperity of the Company. If an employee has any suggestions or constructive criticism which they feel may improve the organisation systems, products or equipment in any way, they should take the opportunity of discussing this with their Manager.

18.3 Break Area

A break area is provided on site, including a fridge, kettle and microwave– this area must be kept clean and tidy!

Sandwiches and hot food can be purchased from the Gallery situated in Imperial house.

18.4 Telephone

There may be times when employees have to make a personal telephone call, during work time either using a Company telephone or their own mobile telephone. Excessive personal calls can be a disruption to the business and will be dealt with through the Company's disciplinary procedure. In addition, call costs of excessive personal calls must be refunded to the company.

19. GRIEVANCE PROCEDURE

19.1 Introduction

The purpose of this procedure is to ensure that each employee has an opportunity to raise formally with management any grievances relating to their job or complaints regarding the Company or any of its employees. The Company's aim is to ensure that any grievance or complaint is dealt with promptly and fairly by the appropriate level of the Company's management. The procedure does not confer any contractual rights.

It is essential to the proper working of this procedure that any employee raising a grievance should continue to work normally whilst the procedure is being followed.

Where the complaint is of harassment or bullying, use should be made of the Company's Dignity at Work Policy.

It will usually be better for all those involved if grievances can be resolved informally. This procedure should only be used where it is not possible to resolve an issue informally in discussion with the employee's immediate Manager.

At each stage of the procedure, the employee may be accompanied by a fellow worker or trade union official who may address the meeting on their behalf but may not answer questions for them.

Where a complaint or grievance relates to their immediate Manager/Supervisor, the Grievance Procedure can be commenced at the stage above that in which that Manager/Supervisor would be involved.

The Company will keep records of any action taken under this grievance procedure. These will be treated as confidential.

19.2 The Procedure

19.2.1 Stage One

If an employee wishes to raise a formal grievance, they should, in the first instance, raise it, orally or in writing, with their immediate Manager. The Manager will then normally respond to the grievance in writing within 2 working days

19.2.2 Stage Two

If the matter is not resolved at stage one, the employee may refer it in writing within 5 further working days to the appropriate Director or CEO. The employee should set out the grounds for the complaint and the reasons for dissatisfaction with the stage one response. A meeting between the Director and the employee will then take place to consider the matter within 5 working days of the written notice being given to the Director. Following this meeting, the Director will respond to the grievance in writing within 5 working days. At this stage the decision of the Director or CEO is final.

20.0 HOLIDAYS

20.1 Public Holidays

There are eight public holidays as follows:

New Year's Day	Spring Bank Holiday
Good Friday	Summer Bank Holiday
Easter Monday	Christmas Day
May Day	Boxing Day

Employees are entitled to time off for all Public Holidays. However, the Company may nominate alternative days, if required for business reasons, and will give reasonable notice of such.

To receive payment for such holidays, employees must attend for the full day on the working day immediately prior to and following the holiday.

When a public holiday is worked a day off in lieu of the holiday can be taken. (The day to be agreed between employee and their Manager)

20.2 Annual Holidays

- (a) The holiday year is from 1st January to 31st December each year. All employees, permanent and temporary accrue holidays.
- (b) Employees are eligible to take 25 days paid annual holiday in addition to the Public Holidays.
- (c) Holiday entitlement will be calculated on a pro-rata basis for a part time employee, or if employee works only part of the holiday year.
- (d) Holidays must be taken with the prior written agreement of the line Manager, within the holiday year when they are accrued. Holidays not taken before the end of the current holiday year will be forfeited. They may not be carried over into the next holiday year unless agreed by CEO.
- (e) New employees are not entitled to paid holidays until they have accrued the holiday entitlement in the first year of employment. Holidays are accrued at the rate of 2 days for each completed month of service, from the date they commenced employment.
- (f) Some employees maybe required to work over shutdown periods and in such cases they will be notified individually.
- (g) Employees will be required to save holiday days to cover shutdown periods or Company nominated holidays. It is expected, for example, that employees will take 4 or 5 days over the Christmas holiday period. Special arrangements will be made where people have joined too late in the year to accrue enough holidays to cover these periods.
- (h) If an employee leaves having already taken more holidays than have been earned, the difference will be deducted from their final wages. If an employee leaves having not taken their full holiday entitlement, they will be paid for them subject to normal methods of cessation of contract. Upon leaving, the annual holiday entitlement will be calculated up to the date of leaving/to the end of the notice period.
- (i) Holidays will be limited to a maximum of 10 consecutive days at any one time (unless agreed with the CEO). Employees are expected to take at least 15 days prior to the end of September each year.
- (j) Employees must ensure that they carry out a handover of work to their line manager or colleague before taking holidays.

20.3 Application for Holiday - Procedure

Requests for a holiday, even in respect of one day, must be e-mailed to the Manager and the HR Manager for prior approval. If confirmation is not received within 3 days of submitting the e-mail request then consult the Manager.

Three weeks' notice is required for holidays. This is to allow time for the Manager to make alternative staffing arrangements to cover the absence.

The Company reserves the right to refuse specific holiday dates if it is deemed to be prejudicial to the efficiency of the department.

20.4 Annual Holiday Pay

- (a) Holiday pay will be paid at the basic rate of pay, payable at the time of taking the holidays.
- (b) Holiday pay will be on the normal pay date.

21. MATERNITY LEAVE

Employees who become pregnant are eligible to take 26 weeks ordinary and 26 weeks additional maternity leave irrespective of length of service or hours worked. (At least 2 weeks compulsory leave must be taken after the birth.) Other provisions include:

- 1. The right to return to work and not to be dismissed because of pregnancy.
- 2. The right to take maternity leave and return to work within 52 weeks of the date of childbirth.
- 3. The right to statutory maternity pay, provided all requirements are met as laid down by Government legislation.
- 4. The right to time off with pay for ante-natal care.
- 5. The right to Parental Leave (whether male or female) in line with Government Legislation.

21.1. Procedures for the Expectant Mother

- (a) As soon as possible the employee must verbally notify their Manager and the HR Manager that they are pregnant. It is important to let us know in case they are taken ill at work.
- (b) To be eligible for payment for time off for ante-natal appointments, the HR Manager may require proof of the pregnancy and the ante-natal appointments. Ante-natal appointments should be made outside of normal working hours if possible. If this is not possible and the employee requires time off from their normal working hours, they will be paid for their time off, including the travel time to their appointment. Employee must inform their Manager if they are delayed at their appointment.
- (c) Employee must provide notice in writing of their intention to leave work to start maternity leave no later than 15 weeks before the baby is due.

- (d) Medical evidence, normally in the form of a maternity certificate (document reference MAT B1) issued by the Doctor or Midwife, should be given to the HR Manager as soon as it is issued.

The HR Manager will be pleased to advise and assist expectant mothers regarding their eligibility for maternity leave and pay.

22.0. PAY

Pay slips will give details of earnings plus they will itemise the standard statutory and company deductions, as well as any other deductions the employee may have authorised. Any changes to basic or contractual pay will be notified on the pay slip.

The Company reserves the right to make adjustments to final pay in order to recoup any money owed or excess holiday taken above entitlement.

With the exception of statutory deductions and those detailed above, no other deductions will be made without the employees consent.

Upon leaving the Company, final wages will be paid in the normal way by direct transfer on the normal pay date following departure. The final payment will be made up of wages/salary up to the date of termination plus any other monies due. The payroll department will send final pay slip to the employees home address, together with the P45. Any forwarding address must be notified to the HR Manager.

22.1 Pay Frequency

Payment of earnings will be made monthly by credit direct into employees nominated bank account on or before the last working day of each month

Employees will be advised as to where and when pay slips will be available by their individual Manager. If unable to collect the wage or salary slip personally, the employee must provide written authority to any person nominated to collect it.

22.2 Discretionary Bonuses

From time to time discretionary bonuses may be paid by the Company and should not be regarded as part of annual remuneration or a term of the contract of employment.

22.3 Pay Reviews

It is normal Company Policy to review pay rates, salaries, other payments and benefits on an annual basis. Permanent employees will normally have their pay reviewed at the end of each company financial year by the Company, or in some cases on the anniversary of their start date.. All pay increases are discretionary.

22.4 Lateness

Lateness will be closely monitored and unacceptable levels will result in disciplinary action and/or deductions from pay.

22.5 Business Expenses

The Company will reimburse all employees for reasonable expenses incurred wholly, exclusively and necessarily in respect of company business. Company guidelines on expenses are intended at all times to be in line with HMRC regulations.

All cash expenses **must** be supported by an original VAT receipt; claimed on a Company Expense Claim Form and authorized by the appropriate Director

Purchases made on a company credit card must be authorized by the appropriate Director before the spend and be supported by receipts. There is no requirement to attach a Company Expense Claim Form, however the Credit Card Statement must be signed by the card holder to confirm that the statement is correct and that all the expenditure has been incurred solely for business purposes.

22.5.1 Parking

The cost of parking when an individual is away from the office will be reimbursed, where it is related to business. The use of short-term airport parking is prohibited unless essential.

22.5.2 Parking /Speeding and other driving related Fines

Parking/speeding and other driving related fines will not be reimbursed, nor will any costs associated with property stolen from a vehicle whilst on Company business.

22.5.3 Car Hire

Car hire is only permitted in exceptional circumstances and should be authorised by a Director in advance of incurring any expenditure. The type of car hired should be practical for the number of people travelling and be the most economical available.

22.5.4 Fuel Reimbursement for Business Mileage

a) Company Cars

Company car drivers are provided with a fuel card for the purchase of fuel. Records must be kept of private mileage on a monthly basis and the individual will refund the Company at the rate identified by HMRC that prevails at that time which is related to engine size and type of fuel.

b) Private Cars

In claiming for business mileage, the individual's expense claim form should contain details of the miles on each occasion, the destination and reason for the trip. Mileage can be reclaimed (up to 10,000 business miles) and must be supported by an original VAT receipt – allowance will be paid in accordance with the HMRC permitted rates ruling at the time.. The amount of the receipt must be at least equal to the VAT being

recovered. The receipt should be dated before the date of the relevant business journey (and claim).

Please note that Travel between an employee's home, or any other place that is not a workplace, and his/her normal place of work is ordinary commuting and cannot be claimed.

22.5.5 Rail Travel

Travel by rail should be booked as far in advance as possible, and in Standard Class (Not First Class). Bookings should be carried out by Purchasing.

22.5.6 Air Travel

For flights which are not covered by each departmental planned Travel Schedule, a Travel Requisition must be completed and authorized by the CEO. Bookings should be carried out by Purchasing.

22.5.7 Accommodation

Any journey involving an overnight stay which is not covered by the departmental planned Travel Schedule should be pre-authorized by the CEO.

Once authorised, the lowest cost for an appropriate hotel room should be sought.

Each traveller should monitor their own hotel bookings to ensure that they have been correctly made and subsequently managed. Any late cancellation fees will not be reimbursed unless incurred due to business reasons.

As a guide, a hotel room should not exceed £90 per night, any accommodation rates above this value should be agreed with the CEO in advance of committing the Company to the expenditure.

When travelling abroad, it is expected that the local currency equivalent of the above sterling values should be applied. This will not be possible in all instances, as a result of the local economic market, but it is expected that staff would seek to apply the principles of the policy when travelling away from the UK.

22.5.8 Subsistence

Whilst travelling away from the office on Company business, subsistence claims (including all taxes and tips) should not exceed:

Lunch	£8
Dinner	£25

Excessive alcoholic drinks should not be claimed within this total.

The Company will reimburse the exact amount spent i.e. the cost should be minimized within the above limits and supported by receipts. The limits will not be paid as an allowance.

The subsistence allowance is intended to cover costs incurred as a result of being away from the office. Any costs that an employee would have incurred anyway without being on business should not be claimed.

The cost of newspapers, sweets and other confectionary items should be claimed out of this allowance.

When travelling abroad, it is expected that the local currency equivalent of the above sterling values should be applied.

Receipts must be supplied in support of all claims.

22.5.9 Mobile Phones, Laptops and other computing equipment

The Company provides certain individuals with mobile phones and other electronic equipment (laptop computers, fax machines, printers, etc.). This equipment remains the property of the Company throughout its life.

The Company expects that any individual provided with such equipment will treat it with the same due care as if it belonged to that individual. Therefore, if lost or damaged, the Company reserves the right to request the employee to replace/repair the equipment at their own expense. Reasonable wear and tear is expected to occur.

Equipment should never be left in a vehicle overnight, and if it has to be left briefly in a vehicle during the day, it must be locked in the boot.

22.5.10 Phone Calls

For any individual provided with a Company-funded mobile phone it is expected that the majority of the call charges incurred will be in relation to the Company's business.

The Company will monitor the use of mobile phones by handset and any usage that is deemed to be excessive will be discussed with the individual concerned. The Company reserves the right to recover excessive usage costs from the individual concerned.

For individuals who do not possess a Company-funded mobile phone, they should claim for any business related calls made from a private home phone or employee's personal mobile phone, through their expense submission, by reference to the itemised bills. Please note that the line rental remains the personal liability of the individual and cannot be reclaimed.

22.5.11 Items not covered

The following items will not be reimbursed by the Company:

- Airline club membership dues

- Annual fees for personal charge or credit cards
- Car washes

22.5.12 Business Entertaining

Business entertaining is appropriate for key contacts and new potential introducers of business to be entertained.

However, there are some guiding principles that should be applied:

- The level, location and cost of the entertainment should be in line with the nature/importance of the relationship.
- The number of Company staff should not out-number those of the third party being entertained, unless the business relationship so warrants.
- Professional behaviour is expected of all staff who are required to entertain third parties. Whilst the nature of the event is that of entertaining, it should be borne in mind that it is undertaken with a business objective in mind.

There are other areas that need to be considered:

- The Company will not fund excessive travel costs. It is perfectly acceptable to claim the cost of transporting a third party to and from the entertainment venue; however, it is not acceptable for staff to claim the cost of transport in arriving at work (whether this be on the day of the entertaining or on the day following.)
- The cost of transport to an employee's home will only be met if it is inappropriate for that individual to drive themselves; also it will be met if the entertaining activity finishes at an unreasonable hour of the day.
- If there is any uncertainty over the nature of entertaining, it should be discussed with a Director before committing the Company to any expense.

In claiming for business entertaining, the individual's expense claim form should contain details of the amounts spent on each occasion, the nature of the entertainment, the persons entertained and the reasons for the entertainment.

23. PARENTAL LEAVE

Employees with responsibility for a child, including adoptive parents, may have the right to unpaid time off work to care for the child.

23.1 Eligibility

An employee qualifies for parental leave if he or she has been continuously employed for one year or more at the time when the leave begins. The employee must have, or expect to have, responsibility for a child. This covers:

- The child's birth mother;

- The child's biological father if married to the child's mother;
- The person registered as the child's father on the birth certificate;
- The child's adoptive parents; and
- Anyone else who has acquired parental responsibility for the child under the Children Act 1989 or the Children (Scotland) Act 1995.

The right to parental leave is personal, so one parent cannot transfer his or her leave entitlement to the other.

23.2 Statutory Default rules

- Parental leave must usually be taken in periods of a whole week or weeks. However, if the child is entitled to disability living allowance, the leave may be taken in shorter periods.
- No more than four weeks' parental leave can be taken in any calendar year. Each year runs from the date on which the employee first became entitled to parental leave for the child, or, if the employee joined the employer after first qualifying for parental leave, the date on which the employee first qualified for parental leave from this employment by completing one year's service.
- The employee must produce any evidence reasonably required by the employer to show that the employee has legal responsibility for the child, the date of the child's birth or adoption, and, if relevant, the child's entitlement to disability living allowance. This could include, for example, a birth certificate or adoption papers.
- The employee must notify the employer at least 21 days in advance of the date he or she wants the parental leave to begin, and give the dates on which the leave is to begin and end. This need not be in writing. Women on maternity leave who want to take parental leave after their maternity leave has ended can also give notice in this way.
- If the employer considers that its operation would be unduly disrupted if the employee took parental leave between those dates, it can postpone the leave for up to six months, to a date fixed after consultation with the employee. The leave cannot be postponed beyond the child's eighteenth birthday. If the employer decides to postpone the leave, it must let the employee know in writing within seven days of receiving the request for leave, and must give the reason for the postponement and the dates on which the leave will now begin and end. The DTI guide to parental leave (Parental leave) suggests that an employer may be justified in postponing parental leave if the work is at a seasonal peak, a significant proportion of the workforce has applied for parental leave at the same time, or the employee's role is such that his or her absence at the particular time would unduly harm the business.
- If the employee is a father-to-be who intends to take parental leave from the date his baby is born, different rules apply. He must let his employer know he intends to take parental leave at least 21 days before the week the baby is due. He need not give the dates the leave

is to begin and end, but must notify the employer how long he intends to take, and the week the baby is due. The employer cannot postpone the leave.

- Different rules also apply if the employee is an adoptive parent who intends to take parental leave from the date the child is placed for adoption. The employee must let the employer know that he or she intends to take parental leave at least 21 days before the week the child is due to be placed for adoption, or as soon after that as possible. The employee need not give the dates the leave is to begin and end, but must let the employer know how long he or she intends to take, and the week the baby is due to be placed for adoption. The employer cannot postpone the leave.

24. **PATERNITY LEAVE**

Paternity benefits will be provided to all employees who comply with the statutory requirements. To qualify for Ordinary Paternity Leave, the employee must have been with Trumeter for at least 26 weeks by either: 1) the end of the 15th week before the start of the week when the baby is due or 2) the end of the week notified of the match with the child

The employee must also be either the: 1) biological father of the child; 2) mother's husband or partner (including same-sex relationships), 3) child's adopter; 4) husband or partner (including same-sex relationships) of the child's adopter

24.1 **Eligibility**

Employees, who have or expect to have responsibility for the child's upbringing, are entitled to a maximum of 2 weeks' paid ordinary paternity leave providing they meet the eligibility criteria as laid down by government legislation.

Employees may choose to take either one or two consecutive weeks' ordinary paternity leave (starting on any day of the week but not taken as odd days) subject to the following provisions:

- Leave can start on any day of the week on or following the child's birth or placement for adoption, but must be completed within 56 days of the actual date of birth/placement of the child. If the child is born early, leave must be taken within the period from the actual date of birth up to 56 days after the expected date of birth.
- One period of leave is available to employees irrespective of whether more than one child is born as the result of the same pregnancy or more than one child is placed for adoption as part of the same arrangement.

Request for one or two week's leave should be made via e-mail to the HR Manager at least 15 weeks before the beginning of the week when the baby's due, or within seven days of being told by the adoption agency that you have been matched with a child

24.2 **Ordinary Paternity pay**

Employees who apply for ordinary paternity leave and meet the entitlement criteria will receive pay at the current statutory rate, details of which can be sought from the HR Manager.

24.3 Employees who do not meet entitlement criteria

Employees who do not meet the entitlement criteria may request holidays from their entitlement, or unpaid leave. Requests should be made via e-mail to the HR Manager and the employees Manager giving at least 3 weeks notice.

24.4 Company Paternity Day

Providing the employee is: a) the biological father of the child, b) the mother's husband, partner (of either sex) or civil partner who expects to have responsibility for the child's upbringing or c) an employee of either sex who is adopting a child, then Trumeter Technologies Limited will grant one day's leave on the day of the child's birth (or the day of adoption), or the first working day after. This day will be paid at full pay, before any Ordinary Paternity leave starts.

25.0. TERMS AND CONDITIONS OF EMPLOYMENT

25.1 Contract of Employment

Upon or prior to commencement of employment a letter giving an offer of employment will be sent to the employee, the letter will include a summary of the main benefits.

Shortly after commencement of employment, a Contract of Employment will be issued which should be read carefully. One copy should be signed and returned to the Company. The remaining copy should be retained by the employee in a safe place and kept for future reference.

The Contract of Employment, plus details given in Section 2 of this handbook, form the terms and conditions with the Company. Contracts and the Employee Handbook are from time to time updated in which case written notification (either by Employee notices or individual notification) will be given of any changes.

By taking employment with the Company, the employee is deemed to have accepted these terms and conditions and to have undertaken to comply with such policies, practices and procedures.

25.2 Reference and Medical Examinations

Any offer of employment made by the Company is conditional upon:

- (a) Employment References. The receipt of satisfactory references to the Company, either prior to commencement, or within 28 days of employment.
- (b) Medical Examination. An employment medical, at the Company's expense, with a report to the satisfaction of the Company, before or after appointment, or at any time during employment with the Company. Such medical examinations may include random tests for drugs/alcohol. The examining doctor will be nominated by the Company.

25.3 Probationary Period

All new members of staff will serve a probationary period, the length of which will be notified in the offer letter / Contract of Employment.

If promoted or transferred to another position, the first three months of work shall be regarded as a trial period. If performance is deemed to be unsatisfactory or unsuitable in any way, the Company reserves the right to down-grade an employee (with an appropriate reduction in the rate of pay) or extend any trial period.

25.4 Hours of Work

The hours of work are as defined in the offer letter / Contract of Employment. The Company reserves the right to alter and change hours of work, upon the giving of reasonable notice, usually two weeks, due to business needs.

25.4.1 Lieu Time

The company does not operate a lieu time system and employees are expected to manage their workload within normal working hours.

There is flexible working system that allows employees 45 minutes flexibility at the start and/or finish of each day providing that the total hours worked equates to 72 hours within a two week period.

The only exception to these rules relates to travel or working over a weekend, when a maximum of 8 hours per calendar day can be claimed back, and later used as an additional paid time off. To request this time off in lieu of weekend working, a holiday request must be made in the usual way (Procedure 20.3) quoting the date of the business trip the lieu time relates to. Please note that this does not relate to being away from home over a weekend, but only to specific days travelling or working at the weekend.

25.5 Working from Home

The place of work is as defined in the offer letter / Contract of Employment. Under certain circumstances however the employees' line manager may approve a period of working from home. This may also be sanctioned in the event that adverse weather conditions make it impractical for the employee to travel into the normal place of work.

25.6 Overtime

The Company may require additional hours to be worked, dependent on the needs of the business. No overtime payments will be made unless otherwise stated in the Contract of Employment. Details of additional hours payments can be confirmed with the Company Secretary.

25.7 Time and Attendance

Employees should follow the procedure outlined in 10.3.1 by ticking in and out as follows:

- (a) *Immediately before the commencement of work*
- (b) *Immediately after leaving your work area.*

For safety reasons, employees should ensure that they tick out and notify their Manager/Supervisor if they need to leave the Company premises during normal working hours.

The ticking in or out of another employee is a very serious offence and will normally be construed as gross misconduct.

25.8 Company Property

On leaving employment with the Company, employees must return all items of Company property, including mobile phones, laptops, credit cards, protective clothing, keys, papers and documents pertaining to the Company (and copies of such must not be taken). Outstanding payments and last salary payments will not be made until all property has been returned to the Company.

25.9 Confidential Information

Employees must treat the affairs of the Company as confidential and not discuss any Company information with anyone outside the Company. It is an express condition of employment that at all times, employees comply in full with the requirements of the Employee Confidentiality Agreement (if issued as an appendix to the Contract of Employment and in addition do not, through their acts or omissions breach or put at risk the reputation, ethical values or security of the Company. No statement may be made to the media (newspapers, TV, radio etc) without permission of the CEO.

It is a condition of employment that employees do not at anytime during their employment with the Company directly engage, or be concerned with, any business of any kind that could in any way interfere with their duties to this Company, without first disclosing that interest to the CEO.

It is an express condition of employment to advise the Company in writing if an employee is a Company Director or a majority shareholder of another business.

No employee may be concerned in any business or job role similar to or competing with that of the Company, without first disclosing the full extent of that interest and obtaining approval from the CEO.

25.10 Notice

Full details of the notice period are outlined in your Contract of Employment.

The Company reserves the right to require an employee not to take up other paid or unpaid work, or offer services of any kind to another company during the notice period, even if the employee is not required to undertake work by Trumeter Technologies Limited, unless agreed in writing by the Company.

If an employee leaves without giving notice or serving their full notice period, the Company reserves the right to deduct the equivalent period from any outstanding monies owed to them on termination of employment.

25.11 Company Vehicles

Any non-contractual Company car, provided, may be withdrawn at the sole discretion of the Company. Factors which may be considered in such a decision may include obvious lack of care of the vehicle, unauthorised use by the employee or any other person, whether employed by the Company or otherwise, and lack of effective use, especially if it has been provided to facilitate the fulfilment of the duties of your employment.

Any car provided by the company should be handed back to the company in the same condition that it was initially provided, less any allowance for wear and tear. Any charges to return the vehicle to a reasonable condition must be paid by the employee.

There may be occasions when an employee will be required to make their Company car available for other members of staff for a limited period of time.

A company pool car may be available for use by employees for legitimate business purposes only. Such a car should be returned to the office after use and should not be used to travel from home to the office. Any employees wishing to use this vehicle should contact HR Manager who will allocate the vehicle on a first come first served basis, although duration and distance of the journey will be taken into consideration. Employees must provide a copy of their current driving license to HR Manager along with date of journey, reason for journey and start and finish mileage for the trip.

Employees must notify the HR Manager of disqualification from driving, plus any illness or disability that could affect their ability to drive.

25.12 Suspension

Under the employees Contract of Employment, the Company reserves the right to suspend, with pay, any employee pending a disciplinary hearing. The objective of such suspension is to allow parties involved reasonable time to investigate and prepare for a disciplinary hearing, and to ensure that action is not taken in "the heat of the moment", by defusing the immediate situation.

The suspension will be followed by a hearing which will be set at the earliest convenient time to both parties.

Pay may be withdrawn for part or all of the suspended period if the hearing concludes that disciplinary action is to be taken against the employee.

In cases of gross misconduct, as an alternative to dismissal, you may be suspended without pay for a specified period and receive a final written warning.

25.13 Changes in Personal Circumstances

Any changes in personal circumstances i.e. change of address, telephone number or bank details etc. should be notified to the HR Manager by e-mail.

Where this involves a change of beneficiaries for Death in Service payments (for example, a change in marital status) a new 'Expression of Wish' form should be completed.

25.14 Smoking

The Company holds the view that smoking constitutes both a health risk, and a fire hazard, and therefore is not allowed anywhere on Company property except in the smokers shelter located at the rear of the car park. Any breach of these rules will be dealt with under the Company's disciplinary procedure in the severest possible manner.

26.0 SECURITY

26.1 Computer Network

Many employees have access to the Company's computer Network. The data held on the network is vital to the Company's operations and it essential that you observe proper security procedures when using your computer.

Access to the network must be protected by passwords which are specific to individual employees and must not be divulged to other people except as requested and required by the Company. The network has a virus checking procedure built in to it, and unauthorised software must not be loaded on to the Company system. If work is taken home for completion on your own PC, then it must be virus checked before being loaded back on to the network.

Please note that it is Company policy that no unauthorised software is to be installed, used or copied on to any Company computers/network at any time. This includes games, screen savers, trial software, etc.

All data remains the property of the Company, and any discs containing Company information must be returned should you leave the Company.

In addition, please make reference to the full Trumeter Group IT Policy which can be viewed on the company intranet.

26.2 Right of Search

As part of the Company's security procedures, an authorised employee of the Company (or authorised agent acting on its behalf) may question employees whilst on, entering or leaving the Company's premises in relation to the property of the Company, its employees or visitors.

Such person may require employee to submit to a personal search (which will be conducted with proper regard to gender or any other relevant sensibilities).

Such person may also search any property employee has with them and/or any vehicle in or on which they may be riding or belonging to you and/or any desk, locker or other storage allocated to you.

Any search may, at your request, be conducted in the presence of a fellow employee of your choice provided he or she is available on the premises at that time and consents to act as a witness.

You are required as a term of your employment to co-operate fully. Failure to do so will be dealt with under the Company's disciplinary procedure and could lead to dismissal without notice.

26.3 Company Equipment

When equipment is borrowed or hired, with permission, this must be authorised in advance, in writing by your Manager. A list of all Company owned equipment on loan will be held in your personal file, and all equipment must be returned if you leave the company. Failure to do so will lead to a deduction from your final pay to the value of the equipment.

The security of the property and personnel of the Company is a matter of the utmost importance. No unauthorised visitors will be allowed on the premises, and no Company property may be removed from the premises without prior authority. The property of the Company includes all information, howsoever stored, confidential or otherwise.

26.4 Personal Property

Personal property remains the sole responsibility of the owner, and the Company cannot be held liable for any loss or damage to such items.

All property left on Company premises is left at the owner's risk, including cars, motorcycles and cycles.

26.5 Visitors/Contractors

Under normal circumstances, you are not allowed to receive personal visitors at the site.

Any business visitors must sign in the visitor's book at reception and be issued with a visitor's badge which should be for the current day only.