KILKERN
INFRASTRUCTURE SPECIALIST

QUALITY POLICY

Kilkern Ltd is fully committed to a policy of quality management in the company and a philosophy of continuous improvement in all its operations. We recognise that adopting this approach gives us great commercial strength and that our commitment to a quality approach is not an optional extra.

Our aim is to provide a service that meets our customer requirements in a timely manner. In support of this Kilkern Ltd will ensure that all necessary resources are available to maintain this Business Management System and to improve its effectiveness.

Quality objectives shall be established, both strategically and individually, throughout the business. These objectives shall be reviewed on a regular basis via regular management meeting and feedback both from and to personnel within the business. We listen to our customers, continually reviewing our processes of product realisation in line with business needs, purpose, context and strategic direction, maximising the efficiency of our Quality management system.

Our employees are our greatest asset and we aim to give them every opportunity to use their skills and experience to improve the quality of the service we provide. To this end Kilkern Ltd shall ensure that all personnel have the appropriate skills and competence in order to fully meet the requirements of this policy.

We want all our people to be committed to quality, to recognise its importance, and to act accordingly and we recognise that it is our responsibility to provide them with the means and the motivation to do so.

We shall not rest on our achievements but will continue to make quality a fundamental part of our policy, strategy and operations. We recognise that customers' expectations and perception of the quality of service we provide do not stand still and we are committed to meeting, and exceeding wherever possible, those expectations.

a) To develop and maintain a Quality Management System in line with the requirements of BS EN ISO 9001:2015 which forms the framework for setting objectives, achieving continual improvement, and client satisfaction.

b) To satisfy customer, legal and other applicable requirements in the course of its business.

c) Establishing levels of communication capable of fully determining the needs and expectations of both customer and interested parties. Communicating this quality policy inside of the business and to relevant interested parties.

d) To establish and maintain an infrastructure capable of supporting all company activities and realising all company objectives. Objectives and their targets are reviewed regularly.

e) To identify scope for improvement in every aspect of the company's activities, devising and implementing effective solutions throughout.

This policy is available to all interested parties on request. Kilkern Ltd will ensure that this policy statement is briefed, understood and implemented at all levels within the company. This policy will be reviewed annually as part of the Management review process, to ensure its continued relevance and adequacy.

Date 7th November 2022

P Curran
Director

KILKERN
INFRASTRUCTURE SPECIALIST

HEALTH & SAFETY POLICY STATEMENT

Kilkern Ltd is dedicated to operating a Safety Management System in accordance with the principles of ISO 45001:2018 in order to demonstrate its commitment to safety to customers, employees and contractors. This will be achieved by enforcing an effective health and safety policy and has a philosophy of continuous improvement in all its operations. This commitment comes not simply from the necessity to fulfil legal and regulatory requirements but from the desire to ensure that the highest reasonable standards in Health, Safety and Welfare for all our employees are achieved and maintained and also to ensure that at no time is Health and Safety ever compromised.
For rail work Kilkern Ltd will ensure our procedures and processes are in compliance with Network Rail's policy.

The policy is communicated to all employees at induction or when any significant changes are made. It is also fully supported by the management team who will work to ensure that:

- Incidents of personal injury and occupational illness are minimised.
- All tasks are reviewed to identify hazards, assess risks and implement effective control measures and that a safe system of work is always used.
- All relevant legislation and ensuring all other mandatory requirements are fully complied with. For rail work this will also include compliance with Railway Industry Standards.
- Employees refusing to work on the grounds of health & safety are supported.
- Adequate, competent supervision is provided to enable all employees and sub-contractors to comply with their responsibilities.
- Sufficient training and mentoring is provided to ensure the competence of all staff.
- Sufficient resources are made available to ensure health; safety and welfare provision are adequately delivered.
- Communication & consultation takes place with all employees regarding health, safety & welfare issues and that safe working practices are actively promoted.
- The provision & maintenance of safe premises, tools, plant and equipment takes place.
- All employees are issued with Personal Protective Equipment necessary for the duties they are carrying out.
- There is provision for safe methods of handling, transport and storage of items, materials and substances as required by relevant regulations.
- Measure the culture of the business using a maturity tool that is accepted in the industry as giving an accurate reflection of the safety culture within the company
- Safety objectives and targets will be established throughout the business. These objectives shall be reviewed on a regular basis via regular management meeting and feedback both from and to personnel within the business.
- This policy supplements and describes how we discharge our duties under the Work at Height Regulations 2005. Falls from height are the most common cause of fatal injury and the second most common cause of major injury to those working in the construction industry. We will provide a safe working environment for all employees who may be required to work at height.

This policy will be reviewed annually as part of the Management review process, to ensure its continued relevance and adequacy.

Date 7th November 2022

P Curran
Director

KILKERN
INFRASTRUCTURE SPECIALIST

ENVIRONMENTAL POLICY

We all have a responsibility to protect the environment from the effects of our activities. Kilkern Ltd takes its responsibilities seriously in this respect and is committed to reducing the impact of its activities on the environment.

To this end Kilkern Ltd recognises that there are many steps that it can take to continuously improve its environmental performance and thereby reduce or prevent damage to the environment. These steps can also add value to our business and make a positive contribution to the success of the company. In other words, we do not believe that good environmental management and the financial wellbeing of the company are incompatible.

In order to meet this commitment Kilkern Ltd will pursue the following aims and objectives:

- To ensure compliance with all applicable environmental legislation.
- To reduce consumption of natural resources.
- To reduce emissions and prevent pollution.
- To minimise noise and other nuisances.
- To assist in the management of ecology.
- To protect the environment from the effects of our work activities.
- To minimise the life cycle impact of our operations and physical assets.
- To wherever possible reuse or recycle waste produced and to dispose of any remaining waste in the most environmental efficient way possible.
- To set environmental objectives and targets and to continuously assess and improve our environmental performance.

The principal elements of our policy are: -

1. Maintaining an environmental management system in line with the requirements of International Standard ISO 14001:2015;
2. Setting and reviewing progress towards environmental objectives and targets and management programmes to ensure continual improvement;
3. Providing environmental awareness for all employees to understand the company's environmental policies, objectives and programmes and their role within them;
4. Ensuring the company understands and complies with the requirements of all environmental legislation, guidelines and codes of practice applicable to the organisation;
5. Ensuring Subcontractors/ Partners meet or exceed our environmental standards.
6. Committing adequate financial and staff resources
7. This policy is available to all interested parties on request

The necessary personnel and financial resources will be allocated to assist in meeting the above environmental objectives. In addition, Kilkern Ltd will continue to raise the levels of environmental awareness throughout its workforce and to promote this awareness to its customers and suppliers. This policy will be reviewed annually as part of the Management review process, to ensure its continued relevance and adequacy.

Date 7th November 2022

P Curran
Director

KILKERN
INFRASTRUCTURE SPECIALIST

ALCOHOL & DRUGS POLICY

Kilkern Ltd is committed to enforcing an effective Alcohol & Drugs Policy.
As a company we recognise the importance of an effective drugs and alcohol policy in its contribution towards ensuring the health, safety and wellbeing of all our employees, sub-contractors, visitors and all those affected by our works. This policy and its mandatory application will be communicated to all employee and sub-contractors.
For rail work this will be in accordance with the requirements of Railway Group Standard RIS/8070/TOM - Alcohol and Drugs (current issue), Network Rail Company Standard NR/L1/OHS/051 (current issue) - Network Rail's Alcohol & Drugs Policy, the Transport at Works Act 1992 and Railways and Other Guided Transport System (Safety) Regulations 2006.

It is a requirement of Kilkern Ltd that no employee or sub-contractor shall:

- Report or attempt to report for duty having just consumed alcohol or being under the influence of drugs.
- Report for duty in an unfit state due to the use of alcohol or drugs.
- Be in possession of alcohol or drugs of abuse in the workplace or supply or attempt to supply them in the workplace.
- Consume alcohol or drugs while on duty.
- Use prescribed or over the counter medicine while working for the company without advising their Line Manager of any effect such medication may have on their performance or ability to work safely.

Kilkern Ltd will undertake regular alcohol and drug screening of employee and sub-contractors working on railway work who are holding Sentinel Smart cards under the following circumstances:

- Pre-employment (If a prospective employee refuses to consent to such an examination/screening Kilkern Ltd has the right to immediately withdraw any offer of employment made).
- Promotion or transfer to Safety Critical activities.
- Following an incident where the use of alcohol and/or drugs may have been a factor.
- When there is cause to suspect that an employee is using or is under the influence of drugs or alcohol.
- As part of a Random/Unannounced screening process a minimum 5% of Sentinel Smart card holders will be Alcohol and Drugs screened per annum, audit to audit.

Note: Kilkern Ltd may also undertake Random and For Cause alcohol and drug screening of employee and sub-contractors not holding Sentinel Smart cards who are working for them on non-railway work as when the company deems this to be appropriate.

The implementation of this policy will be supported by the following:

- For all employees and sub-contractors working for Kilkern Ltd refusal to undertake Alcohol and Drugs tests will be considered a positive result.
- Kilkern Ltd will not tolerate any departure from these rules and will take the appropriate disciplinary action which will normally result in dismissal in the event of any infringement.

This policy will be reviewed annually as part of the Management review process, to ensure its continued relevance and adequacy.

Date 7th November 2022

P Curran
Managing Director

KILKERN
INFRASTRUCTURE SPECIALIST

ANTI-BRIBERY POLICY

Bribery is, unfortunately, a feature of corporate and public life. Therefore Kilkern Ltd has a clear policy on this issue and we support our employees to make decisions in line with our stated position.

Our corporate conduct and that of our employees is based on our commitment to acting professionally, fairly and with integrity at all times. Kilkern Ltd does not and will not tolerate any form of bribery within its business.

The purpose of this policy is to set out the responsibilities of Kilkern Ltd's functions and business in observing and upholding our position on bribery.
Kilkern Ltd is committed to operating responsibly wherever we work and to engage the social, environmental and ethical impact of our activities in the markets in which we operate.

Our first principle in operating responsibly is with regard to 'integrity in corporate conduct', in that Kilkern Ltd does not engage in bribery or any form of unethical inducement or payment including facilitation payments and 'kickbacks'.

All employees are required to avoid any activities that might lead to, or suggest, a conflict of interest with the business of Kilkern Ltd. All employees must not accept under any circumstances any hospitality or gifts without first gaining the consent of the Managing Director.
We will uphold laws relevant to countering bribery in all circumstances and in particularly will comply with the Bribery Act 2010.

Responsibilities
The Managing Director will ensure that any instance of bribery is identified within Kilkern Ltd and dealt with by taking appropriate remedial and or disciplinary action immediately.

Training and communications
We will communicate this policy to Kilkern Ltd employees through our established internal communication channels and briefing processes.

Raising concerns and seeking guidance
Kilkern Ltd employees are encouraged to raise concerns about any instance of malpractice at the earliest possible stage in total confidence to their immediate manager/supervisor.

Monitoring and review
Kilkern Ltd will review the implementation of this policy in respect of its suitability, adequacy and effectiveness on an annual basis and make improvements as appropriate.

Date 7th November 2022

P Curran
Director

KILKERN
INFRASTRUCTURE SPECIALIST

DATA PROTECTION POLICY

Kilkern Ltd is committed to ensuring the privacy and security of all personal data retained. The main board of Directors and Senior Managers are committed to the delivery of this policy statement and ensuring it is understood and followed throughout the business. The Kilkern Ltd company structure facilitates transparent and compliant administration of the General Data Protection Regulations 2018 (GDPR); this includes assigning responsibilities for Data Protection to a specific individual within the structure of the organisation. This role has been assigned to the Office Manager.

Through the implementation of defined processes and with a strong focus on managing risk, Kilkern Ltd communicate openly with internal and external customers on how their personal data is collected and stored. Kilkern Ltd only process personal data that is essential to business operations or our continued compliance with government and regulatory bodies where we are required to achieve certain operational, vocational and administrative standards. This may include the need to verify certain competencies or qualifications held by an individual which may be essential for them to carry out their work.

Personal data will be captured through completion of the Kilkern Ltd Application form. All employees will be required to complete the company Data Protection Consent Agreement this will identify exactly which elements of Personal data the company can hold on their behalf. All employees will have the right to refuse to allow the company to hold any of their Personal data as identified on the Data Protection Consent Agreement.

Kilkern Ltd confirms to employees via this policy that no personal data will be passed to a third party without the express permission of the individual concerned. All personal data is stored in a password-protected database managed by the specific individual assigning responsibilities for Data Protection.

Through the continual monitoring of compliance with this policy, Kilkern Ltd regularly reviews the accuracy of personal data held and offers all individuals routine opportunities for review and updating of this information. The quality and accuracy of all personal data is a primary concern and upon reasonable request, all personal data that is being held, where/how it was obtained and who it may be shared with will be made available.

All individuals retain the right to complain to the Information Commissioners Office (ICO) should they feel there is a cause for concern regarding the way their personal data is being managed or processed. In the first instance, all investigations will be carried out at a senior management level and be escalated to the Managing Director in the event that an acceptable resolution cannot be achieved.

Kilkern Ltd ensures that all consent mechanisms used in the consent process are unambiguous. Every opportunity is provided for the individual to assert a positive indication of agreement and that they have been afforded the opportunity to make a decision, rather than proceed on an assumption of acceptance by default.

Data security is of paramount importance to Kilkern Ltd as part of our protection from any data breaches systems are constantly monitored, audited and assessed to facilitate the detection of potential breaches. Any breaches deemed to be of a level that may involve suffering, financial loss or damage through identity theft or confidentiality breach will be notified to the ICO.

Kilkern Ltd do not currently operate internationally. In the event that our business expands internationally this policy will be amended and distributed through the appropriate channels.

Date 7th November 2022

P Curran
Director

KILKERN
INFRASTRUCTURE SPECIALIST

WHISTLEBLOWING POLICY

Introduction

Kilkern Ltd is committed to the highest standards of openness, probity and accountability.

An important aspect of accountability and transparency is a mechanism to enable staff and other members of the Company to voice concerns in a responsible and effective manner. It is a fundamental term of every contract of employment that an employee will faithfully serve his or her employer and not disclose confidential information about the employer's affairs. Nevertheless, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organisation then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of line management (although in relatively minor instances the line manager would be the appropriate person to be told).

The Public Interest Disclosure Act 2013, gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. The Company has endorsed the provisions set out below so as to ensure that no members of staff should feel at a disadvantage in raising legitimate concerns.

It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by the Company nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures. Once the "whistleblowing" procedures are in place, it is reasonable to expect staff to use them rather than air their complaints outside the Company.

Scope of Policy

This policy is designed to enable employees of the Company to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety. This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary. These concerns could include

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or Statutes
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Attempts to conceal any of these

Safeguards

i. Protection

This policy is designed to offer protection to those employees of the Company who disclose such concerns provided the disclosure is made:

- In good faith

- In the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person (see below). It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case malicious or wild allegations could give rise to legal action on the part of the persons complained about.

ii. Confidentiality

The Company will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

iii. Anonymous Allegations

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the Company.

In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources

iv. Untrue Allegations

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

Procedures for Making a Disclosure

On receipt of a complaint of malpractice, the member of staff who receives and takes note of the complaint, must pass this information as soon as is reasonably possible, to the appropriate designated investigating officer as follows:

- Complaints of malpractice will be investigated by the appropriate Director unless the complaint is against the Director or is in any way related to the actions of the Director. In such cases, the complaint should be passed to the Chief Executive for referral.
- In the case of a complaint, which is any way connected with but not against the Director, the Chief Executive will nominate a Senior Manager to act as the alternative investigating officer.
- Complaints against the Chief Executive should be passed to the Managing Director who will nominate an appropriate investigating officer.
- The complainant has the right to bypass the line management structure and take their complaint direct to the Managing Director. The Managing Director has the right

to refer the complaint back to management if he/she feels that the management without any conflict of interest can more appropriately investigate the complaint.

If there is evidence of criminal activity then the investigating officer should inform the police. The Company will ensure that any internal investigation does not hinder a formal police investigation.

External reporting

It is hoped that this policy will provide employees with the assurance that they can raise whistleblowing issues internally. However, we accept that there may be circumstances where employees feel it is more appropriate to make the disclosure to an external body. An external body may be a regulator or non-regulatory body. These can include but not limited to:

- HM Revenue and Customers
- The serious Fraud Office
- The Media
- The Police
- The Environment Agency

The disclosure will be protected under the legislation in the same way as disclosures made internally as long as they meet the same satisfying conditions.
In the event of external disclosure, the relevant regulatory or non-regulatory body will carry out investigations as necessary and to the procedures and processes set out by them.

Timescales

Due to the varied nature of these sorts of complaints, which may involve internal investigators and / or the police, it is not possible to lay down precise timescales for such investigations. The investigating officer should ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations.

The investigating officer, should as soon as practically possible, send a written acknowledgement of the concern to the complainant and thereafter report back to them in writing the outcome of the investigation and on the action that is proposed. If the investigation is a prolonged one, the investigating officer should keep the complainant informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded.
All responses to the complainant should be in writing and sent to their home address.

Investigating Procedure

The investigating officer should follow these steps:

- Full details and clarifications of the complaint should be obtained.
- The investigating officer should inform the member of staff against whom the complaint is made as soon as is practically possible. The member of staff will be informed of their right to be accompanied by a trade union or other representative at any future interview or hearing held under the provision of these procedures.
- The investigating officer should consider the involvement of the Company auditors and the Police at this stage and should consult with the Managing Director.
- The allegations should be fully investigated by the investigating officer with the assistance where appropriate, of other individuals / bodies.

- A judgement concerning the complaint and validity of the complaint will be made by the investigating officer. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement. The report will be passed to the Managing Director as appropriate.
- The Managing Director will decide what action to take. If the complaint is shown to be justified, then they will invoke the disciplinary or other appropriate Company procedures.
- The complainant should be kept informed of the progress of the investigations and, if appropriate, of the final outcome.
- If appropriate, a copy of the outcomes will be passed to the Company Auditors to enable a review of the procedures.

If the complainant is not satisfied that their concern is being properly dealt with by the investigating officer, they have the right to raise it in confidence with the Chief Executive / Managing Director, or one of the designated persons described above.

If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcome of the investigation, the Company recognises the lawful rights of employees and ex-employees to make disclosures to prescribed persons (such as the Health and Safety Executive, the Audit Commission, or the utility regulators), or, where justified, elsewhere.

Date 7th November 2022

P Curran
Director