



Ballycommon

HEALTH & SAFETY POLICY

Ballycommon is so far as is reasonably practicable committed to enforcing an effective health and safety policy in line with the Health & Safety at Work Act 1974 and with current and up to date statutory Health & Safety legislation. 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.

It is the policy of Ballycommon to develop a culture in which every employee is involved in creating a safe working environment for themselves and others and we work on the principle that all accidents, injuries, and occupational ill health are preventable. This policy is fully supported by the management team who will work to ensure that:

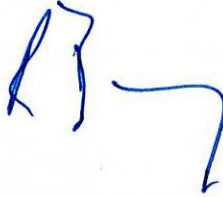
- Incidents of personal injury and occupational illness are minimised.
- All tasks are reviewed to identify hazards, assess risks, and implement effective control measures and that a safe system of work is always used.
- All relevant legislation, Railway Industry Standards, and other mandatory requirements are fully complied with.
- Staff 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 are provided to ensure the competence of all staff.
- Sufficient resources are made available to ensure health; safety and welfare provisions are reasonably practicable.
- To ensure Health & Safety is never compromised to enable other objectives to be achieved.
- Communication & consultation takes place with all employees regarding Health, Safety & Welfare issues, and safe working practices are actively promoted.
- All employees will embrace the Rail industry's Life-Saving Rules.
- 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.
- The company will set safety objectives as a minimum on an annual basis. These will be reviewed during the bi-annual Management Meeting.
- This policy is communicated to all employees and is on display in our offices and via our company website.

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

It is the responsibility of the Managing Director to ensure that Health & Safety Policy is updated to reflect identified changes resulting from the Company's review process.

Redmond Barry
Managing Director



Date

18/3/2025

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Quality Management Policy Statement of Intent

Introduction and aim

Ballycommon Services Ltd is a Labour supplier business, operating from a site in Nationwide. Our main services are Supplying Rail, Civils, Highways, and Construction companies with Labour. We are committed to providing our customers with high-quality products and services that meet or exceed their expectations. We believe that quality is an essential aspect of our business and that it is vital for our success.

The company aims to achieve the above by implementing a management system that complies with the international standard of good practice BS EN ISO 9001:2015. It also includes a commitment to meet the requirements of our clients, learn from customer feedback, as well as legal and regulatory requirements. Also, to continual development of the system and helping to ensure it remains effective.

All personnel within the company are responsible for the quality of their work. The company provides training and has established systems to assist all personnel to achieve the standards required. While we endeavour to produce work and offer a service that we can be proud of, we must recognise that we do not always achieve our own standards. When a customer complains, we are committed to investigating the complaint and will do our best to put right all justified complaints.

Only by providing an outstanding service and product quality will we achieve our aims of long-term success and sustained improvements.

To achieve this, we will:

- Understand and meet our customers' needs and expectations.
- Continuously improve our products and services to enhance customer satisfaction.
- Train and develop our employees to ensure that they have the necessary skills and knowledge to perform their roles effectively.
- Use the latest technologies and techniques to ensure that our products and services are of the highest quality.
- Monitor and review our processes regularly to identify opportunities for improvement.
- Comply with all relevant legal, regulatory, and industry requirements.
- Communicate this quality policy to all employees, customers, and stakeholders.
- Continuously evaluate our performance to ensure that we meet our quality objectives.
- Monitor our suppliers' quality management arrangements to ensure that quality performance appropriate for the work to be undertaken is delivered throughout the whole of our organisation's supply chain.

We are committed to achieving excellence in everything we do. Our quality policy is central to this commitment, and we will work tirelessly to ensure that we meet our customers' needs and expectations while maintaining the highest standards of quality

Name ... *(Edmund) BARRY*

Signed *(Signature)*

Date *12/3/2025*

Director Responsible for Quality ... *(Edmund) Barry*

Director Responsibilities

The company director is responsible for:

- Ensuring that the Quality Management System accurately reflects the requirements of the International Standard (BS EN ISO 9001:2015).
- Ensuring that all processes deliver their intended results.
- Providing reports on the performance of the Quality Management System and reporting opportunities for improvement back to Top Management.
- Prioritising customer focus.
- Evaluating and implementing planned changes to the Quality Management System.

Arrangements for Quality Management

Non-conformance and Corrective Action

A non-conformance is a non-fulfilment of a requirement which identifies a failure or gap in a management system.

Non-conformance can be raised through a variety of means, these include, but are not limited to:

- Audits.
- Inspections.
- Complaints.
- Observations.
- Incidents.
- Enforcement Action.

All non-conformances shall be recorded and corrected as soon as reasonably practicable. It may also be necessary to take corrective or preventative action to prevent recurrence or prevent a similar non-conformance occurring elsewhere.

In the event of a non-conformity, including any resulting from complaints, the Organisation shall do the following:

- 1) Respond to the non-conformity and, as applicable:
 - Take measures to control and correct it
 - Handle the outcomes.
- 2) Assess the requirement to act to remove the cause(s) of the non-conformity, to prevent its occurrence or recurrence elsewhere, through:

- The review and analysis of the non-conformity
 - The determination of the causes of the non-conformity
- 3) The determination of whether similar non-conformities exist or could potentially occur.
 - 4) Put any necessary action into practice
 - 5) Review the effectiveness of any corrective action carried out
 - 6) If necessary, update risks and opportunities ascertained at planning stage
 - 7) If necessary, make changes to the Quality Management System Corrective actions shall be appropriate to the effects of the non-conformities in question.

Competence and Training

The following shall be undertaken by the Organisation in relation to staff competencies:

- The competence required of person(s) doing activities under its control affecting the performance and effectiveness of the Quality Management System shall be determined.
- The Organisation shall ensure that such persons are competent as regards suitable education, training, or experience.
- Actions shall be taken to gain the competence required and to assess the effectiveness of actions taken, where applicable.
- As evidence of competence, appropriate documented information shall be kept.

The following shall be undertaken by the Organisation in relation to staff training:

- All new members of staff receive appropriate induction training during their probationary period. This includes an introduction to the Quality Policy and their individual role in the operation of the Quality Management System and the achievement of relevant Quality Objectives, in addition to the implications of not conforming with the Quality Management System requirements.
- Staff training and competence are assessed considering everyone's education, skills and experience.
- Requirements for further training are identified as part of day-to-day management and as part of the Management Review.

Quality Inspection and Testing

Regular inspection and testing allow us to monitor the quality of our works, minimising rework, the cost of repair and the associated reputational impact. Inspection & testing schedules shall be agreed prior to works commencing and carried out and recorded by a competent person.

Top management will review the effectiveness of the QMS and determine actions for continual improvement.

Audit

An audit is a systematic, independent, evidence gathering process which aims to evaluate how well audit criteria are being met. To effectively manage the QMS, we aim to conduct regular internal quality audits to assess conformance to:

- All relevant legislation, corporate and other requirements.
- The requirements of BS EN ISO 9001:2015.
- The company Quality Policy.

Supply Chain Diligence

All reasonable steps shall be taken to ensure that our supply chain subscribes to the same strict standards. In the interests of quality, the performance, enforcement or regulatory action, policies, accreditations, insurances, finances, credit etc. of our suppliers or supplied labour shall be thoroughly checked before any orders for materials, plant, equipment or labour are raised.

Preference shall always be given to those pre-approved suppliers with a proven reputation for delivering high quality products or services and are known to implement a positive health and safety culture.

The UKCA (UK Conformity Assessed)

We will require our suppliers to send us a declaration to prove that their products meet the regulations around UKCA /CE Marking. We will need to see prove of the following for each product:

- All products they 'Perform product conformity testing on.
- Compile technical documentation.
- Draw up a Declaration of Conformity
- Affix the respective conformity marking (UKCA or CE) to the product's surface and/or packaging.
- Register the product with the national market authorities.
- All our employees and labour force will also check each delivery to ensure that the UKCA mark is visible on all products.

Subcontractors

Prior to the award of any contract or package of works to any sub-contractor, the Company will first carry out a full competence and resources assessment to ensure that each organisation appointed has the necessary skills and resources required to successfully carry out the required works.

A competence and resources questionnaire will therefore be issued to all such organisation, the contents of which will be reviewed by contract or Contracts Manager. From time to time, checks will be made to ensure that the assessment remains valid.

All sub-contractors work will be monitored regularly to ensure quality standards are being met.

Risk Management

The company has established risk management procedures and systems to minimize potential harm and promote safe, quality and practical environmental working conditions.

The identification and management of risks is a critical component of its overall quality management system. The company has developed a risk management process to assess, manage, and monitor risks associated with its operations:

1. Identification of Risks: The company will identify potential risks by carrying out regular risk assessments and incorporating feedback from employees, clients, and other stakeholders.
2. Assessment of Risks: The company will assess the likelihood and consequences of each risk and prioritize them based on the level of harm they could cause.
3. Management of Risks: The company will develop and implement strategies to manage risks, including the use of appropriate controls, such as training, engineering, or administrative controls.
4. Monitoring and Review: The company will regularly monitor and review its risk management processes to ensure that they are effective and up to date.

The Managing Director is responsible for ensuring that the risk management policy and procedures are implemented throughout the company. All employees are expected to contribute to the risk management process by reporting any potential risks they identify.

Classification Standards Compliance

- All products specified and used must adhere to recognised industry standards (e.g., EN, ISO) and be approved as part of a larger sub-system. Products will not be accepted solely based on individual standards; they must also be reviewed within the sub-system context.
- We require Product Data Sheets and Certificates of Conformity to demonstrate compliance with relevant classification standards, both individually and within the specified sub-systems

Construction Phase Verification of Sub-System Integration

- During construction, we verify that products and systems are installed in alignment with sub-system classification standards. Integration checks are conducted at key project milestones, verifying that combined products work together as intended.
- A Competent Person will oversee these checks to confirm compliance and resolve any integration issues. Any adjustments required to maintain classification standards within the sub-system will be documented and addressed immediately.

Competent Person Installation Checks

- All installations of construction products and systems are checked and approved by a designated competent person with appropriate qualifications and experience.
- The competent person is responsible for verifying that each installation meets classification and sub-system standards, ensuring full compliance with safety, quality, and functional requirements.
- For each major installation, a Certificate of Installation Compliance will be issued, certifying that the installation has been checked and meets required standards.



ENVIRONMENTAL POLICY

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

To this end, Ballycommon 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 well-being of the company are incompatible.

To meet this commitment Ballycommon will pursue the following objectives:

- To ensure compliance with all applicable environmental legislation (Environmental Protection Act 1990) and any rail-specific environmental requirements of Network Rail or its Rail Principal Contractors.
- Communicate throughout the organisation the importance of meeting customer needs & expectations and all relevant statutory, regulatory & compliance obligation requirements.
- To reduce emissions and pollution
- To improve waste management practices.
- To reduce consumption of natural resources.
- To minimise noise and other nuisances.
- To assist in the management of ecology.
- To continuously assess its environmental performance.

The necessary personnel and financial resources will be allocated to assist the Company in meeting its environmental objectives. In addition, Ballycommon will continue to raise the levels of environmental awareness throughout its workforce and promote this awareness to its customers and suppliers.

The company will set Environmental Performance Objectives and Targets and will review as a minimum on an annual basis.

This environmental policy applies to all our operations including management, office services, site operations, and procurement. **Redmond Barry Managing Director** has overall responsibility for ensuring that sufficient resources are made available to enable the business to achieve our environmental objectives and targets and that the policy is implemented. **Crystal Henriques HSQE Manager** has the day-to-day responsibility for ensuring that the requirements of this policy are being followed and for monitoring the effectiveness of the objectives. However, all employees have a responsibility in their area to ensure that the aims and objectives of the policy are met.

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

Redmond Barry
Managing Director

Date:

18/3/2025

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DRUGS & ALCOHOL POLICY

Ballycommon is committed to enforcing an effective Drugs & Alcohol Policy following the requirements of Railway Group Standard RIS-8070-TOM - Drugs and Alcohol for safety critical workers (current issue), Network Rail Standard NR/L2/OHS/00120 Drugs, alcohol and Substance misuses in the workplace, Network Rail Standard NR/L1/OHS/051 - Network Rail's Alcohol & Drugs Policy (current issue) the Transport at Works Act 1992 and Railways and Other Guided Transport System (Safety) Regulations 2006. We recognise the importance of such a policy in its contribution towards ensuring the health and safety of our employees, sub-contractors, visitors, and all those affected by our work. This policy and its mandatory application will be communicated to all staff on employment.

It is a requirement of Ballycommon that no employee or sub-contractor who holds PTS 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 on Network Rail Managed Infrastructure without advising the person in charge.

Ballycommon will undertake regular drug and alcohol screening of employees under the following circumstances:

- Pre-employment (If a prospective employee refuses to consent to such an examination/screening Ballycommon 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 screening process, a minimum of 20% of Sentinel competency card holders and Safety Critical employees will be drugs and alcohol screened per annum. (Time frame based on RISQS Audit to RISQS audit).

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

- Refusal to undertake drug and alcohol tests will be considered a positive result. The positive shall be stored on the sentinel database

Ballycommon 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.

It is the responsibility of the Managing Director to ensure that the Quality Policy is updated to reflect identified changes resulting from the Company's review process.

Redmond Barry
Managing Director

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Ballycommon

Equal Opportunities, Diversity & Inclusion Policy

Ballycommon has a clear commitment to ensuring the provision of its services to the public, and its clients, and in the recruitment and employment of staff and sub-contractors, there will be equality of opportunity and treatment.

The end purpose of this policy is to provide equality and fairness for all in our employment and not to be discriminated against or to be treated less favourably because of their Race, Martial Status, Nationality, Religion, Colour, Ethnic or National Origin, Sex or sexual orientation, Age or Mental or Physical Disability.

Ballycommon has a continuing Commitment:

- To prevent, reduce, and stop all forms of unlawful discrimination in line with the Equality Act 2010.
- To ensure that Equality, Diversity & Inclusion are embedded in our company culture.
- To create an environment in which individual differences and the contributions of all our staff are recognised and valued
- Every employee is entitled to a working environment that promotes dignity and respect for all
- Ensure the use of appropriate language in the workplace and safeguard against offensive and discriminatory language being used.

Individuals will be selected, promoted, and treated on the grounds of their performance, attitude, and abilities. All suitably qualified employees will be given equal opportunities to progress within the organisation.

All those who come into direct or indirect contact with employees or applicants for employment should ensure that they understand this policy. Ballycommon encourages the employment and career development of any person suffering from a disability.

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Ballycommon

The Equal Opportunities, Diversity & Inclusion Policy will be communicated to all employees. Breaches of this policy will be regarded as misconduct and could lead to disciplinary proceedings per our Disciplinary procedure.

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

It is the responsibility of the Managing Director to ensure that Equal Opportunities, Diversity & Inclusion Policy is updated to reflect identified changes resulting from the Company's review process.

Redmond Barry
Managing Director

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HOURS OF WORK POLICY

Ballycommon is committed to enforcing an effective Hours of Work Policy in accordance with the requirements of Network Rail Standards Management of fatigue Control of working hours for staff undertaking safety undertaking critical work NR-L3-MTC-MG0224, NR/GN/INI/001 (current issue) - Guidance on the Management of Door-to-Door Work & Travel Time and Fatigue risk management NR/L2/OHS/003 and accompanying modules. Transport for London Standard: Standard Category 1 S1552 A18 Contract QUENSH Conditions, also LuL Appendix B FATIGUE MANAGEMENT & CONTROL OF WORKING HOURS.

We recognise the importance of such a policy in its contribution towards ensuring the health and safety of our employees, sub-contractors, and all those affected by our work.

Ballycommon will take all measures as far as is reasonably practicable to ensure that all employees and sub-contractors are aware of and adhere to the guidelines for hours of work.

Ballycommon requires that all employees or sub-contractors shall not:

- Work more than 12 hours in one shift or period of duty
- Work more than 60 hours maximum in a rolling seven-day period
- Work more than 13 consecutive turns of duty in any 14 rolling days
- Exceeds 14 hours door to door
- Works when they are expected to exceed a Fatigue Risk Index (FRI) fatigue score of 35 during daytime or 45 during night-time hours
- A person works when they are expected to exceed an FRI risk score of 1.6 (regardless of daytime or night-time working).
- Receives less than 12 hours break between booking off from their shift/ period of duty and booking on for their next shift/ period of duty. Except for the following circumstances:

Deviation from the above limits will require a Risk Assessment and will affect the Client's Principal Contractor/Plant operator's Licence.

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Travelling Time

All Ballycommon employees and contractors who hold a Sentinel card competency or are required to undertake Safety Critical Work on behalf of Ballycommon will be required to adhere to the following requirements about travelling to and from sites and lodging away:

Travelling each way to and from the site should ideally be included in the maximum 12-hour turn of duty.

However, where this is not possible, the travelling time must not lead to an overall turn of duty time of more than 14 hours.

Where travelling will lead to an exceedance of the above 14 hours turn of duty limit.

LOGGING WILL BE REQUIRED IN ALL CIRCUMSTANCE

Ballycommon has developed internal procedures to prevent employees or sub-contractors from working excess hours or shifts. Measurement of the effectiveness of these procedures will be carried out via a continuous monitoring process. Should this monitoring process reveal a departure from the procedures then appropriate action will be taken.

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

Redmond Barry
Managing Director

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ANTI-BRIBERY POLICY

Ballycommon is committed to complying with all laws, rules, and regulations regarding anti-bribery and corruption in every country where we operate. The Company maintains a zero-tolerance policy towards bribery and corruption by employees, as well as anyone acting on our behalf. Any violation of this policy will be treated as a serious matter and is likely to result in disciplinary action.

This means that neither the Company nor its employees will seek, accept, or give bribes, facilitation payments, kickbacks, or any other improper payments. We must also ensure that our business dealings are always conducted with appropriate transparency. We will uphold all relevant laws aimed at countering bribery, particularly the Bribery Act 2010.

Scope of the Policy

This policy applies to all individuals working at all levels and grades within the Company, including senior managers, directors, employees (whether permanent, fixed-term, or temporary), consultants, contractors, and any other individuals providing services to us.

Definition of a Bribe

Bribes can take various forms, but they typically involve corrupt intent, often characterized by a "quid pro quo" where both parties benefit.

- A bribe is a financial or other advantage offered or given:
 - To persuade or reward someone for performing their duties improperly.
 - To any public official with the intention of influencing the official in the performance of their duties.

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Gifts and Hospitality

This policy does not prohibit the giving and receiving of promotional gifts of low value or normal and appropriate hospitality. However, certain gifts and hospitality may be considered bribes. All employees must strictly adhere to the policy regarding gifts and hospitality. We will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence a public official in their duties.

Facilitation Payments, Kickbacks, and Donations

We do not make or accept facilitation payments or kickbacks of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. Kickbacks are payments made in return for a business favor or advantage. All employees must avoid any activity that might suggest or lead to the making or acceptance of facilitation payments or kickbacks. We do not make contributions to political parties and no charitable donations will be made for the purpose of gaining any commercial advantage.

Raising Concerns

Employees are encouraged to raise any concerns about issues or suspicions of malpractice as soon as possible. No employee will face any detrimental action for raising genuine concerns about bribery, even if their concerns turn out to be mistaken.

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

It is the responsibility of the Managing Director to update the Anti-Bribery Policy to reflect any changes identified during the Company's review process.

Redmond Barry
Managing Director

Date:

18/3/2025

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ANTI-BULLYING POLICY

Ballycommon is committed to providing all employees with a healthy and safe work environment. Ballycommon will ensure that procedures exist to allow complaints of bullying to be dealt with and resolved within Ballycommon without limiting any person's entitlement to pursue resolution of their complaint with the relevant statutory authority. Ballycommon is committed to the elimination of all forms of bullying.

This policy applies to all employees of Ballycommon. It applies during normal working hours, at work-related or sponsored functions, and while traveling on work-related business. There will be no recrimination for anyone who in good faith alleges bullying.

Definitions

Bullying is unwelcome or unreasonable behavior that demeans, intimidates, or humiliates people either as individuals or as a group. Bullying behavior is often persistent and part of a pattern, but it can also occur as a single incident. It is usually carried out by an individual but can also be an aspect of group behavior (see "mobbing" below). Some examples of bullying behavior are:

Verbal communication

- Abusive and offensive language
- Insults
- Teasing
- Spreading rumor and innuendo
- Unreasonable criticism
- Trivializing of work and achievements

Manipulating the work environment

- Isolating people from normal work interaction
- Excessive demands
- Setting impossible deadlines

Psychological manipulation

- Unfairly blaming for mistakes
- Setting people up for failure
- Deliberate exclusion
- Excessive supervision
- Practical jokes
- Belittling or disregarding opinions or suggestions
- Criticizing in public

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Context is important in understanding bullying, particularly verbal communication. There is a difference between arguments about working, or how to work, or friendly insults exchanged by long-time work colleagues and comments that are intended to be demeaning.

Discussions about working, or how to work, which may even become arguments, must never involve abusive behavior, physical interaction, or contact between colleagues.

While care should be exercised, particularly if a person is reporting alleged bullying as a witness, it is better to be genuinely mistaken than to let actual bullying go unreported.

Mobbing

Mobbing is a particular type of bullying behavior carried out by a group rather than by an individual. Mobbing is the bullying or social isolation of a person through collective unjustified accusations, humiliation, general harassment, or emotional abuse. Although it is group behavior, specific incidents such as an insult or a practical joke may be carried out by an individual as part of mobbing behavior.

CONSEQUENCES OF BULLYING

Bullying is unacceptable behavior because it breaches principles of equality and fairness, and it frequently represents an abuse of power and authority. It also has potential consequences for everyone involved.

For those being bullied

People who have been bullied often suffer from a range of stress-related illnesses. They can lose confidence and withdraw from contact with people outside the workplace as well as at work. Their work performance can suffer, and they are at increased risk of workplace injury.

For the employer

Besides potential legal liabilities, the employer can also suffer because bullying can lead to:

- Deterioration in the quality of work
- Increased absenteeism
- Lack of communication and teamwork
- Lack of confidence in the employer leading to a lack of commitment to the job

For others at the workplace

People who witness bullying behaviors can also have their attitudes and work performance affected. They can suffer from feelings of guilt that they did nothing to stop the bullying, and they can become intimidated and perform less efficiently fearing that they may be the next to be bullied.

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RESPONSIBILITIES

Managers and supervisors

- Ensure that all employees are aware of the anti-bullying policy and procedures
- Ensure that any incident of bullying is dealt with regardless of whether a complaint of bullying has been received
- Provide leadership and role-modeling in appropriate professional behavior
- Respond promptly, sensitively, and confidentially to all situations where bullying behavior is observed or alleged to have occurred.

Employees

- Be familiar with and behave according to this policy
- If you are a witness to bullying, report incidents to your Supervisor or Line Manager as appropriate
- Where appropriate, speak to the alleged bully(ies) to object to the behavior

IF YOU THINK YOU HAVE BEEN BULLIED

- Any employee who feels he or she has been victimised by bullying should report the matter immediately to your manager or if the complaint is about your manager to another manager.
- An investigation will be undertaken following Ballycommon's Disciplinary Procedure and, if appropriate, disciplinary measures will be taken.

This policy can be reviewed and updated at any time and as a minimum annually as part of the Management review process to ensure its continued relevance and adequacy.

It is the responsibility of the Managing Director to ensure that the Anti-Bullying Policy is updated to reflect identified changes resulting from the Company's review process.

Redmond Barry
Managing Director

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Training and Development Policy

As a responsible employer, Ballycommon is dedicated to developing the skills necessary to effectively carry out our business.

In our daily operations, we must remain aware of the services we provide and continuously evaluate our ability to meet customer needs.

Our policy is to ensure that training is an ongoing process that encompasses all employee levels, with the following objectives:

- To provide job skills training that ensures employees are fully equipped to achieve an agreed satisfactory standard of performance.
- To offer training and development opportunities for all employees.
- To create platforms for employees to discuss their performance and development with line management.
- To align employee development with the objectives of the business.

We will conduct monthly reviews of the skills of our employees and the subcontractors we engage, providing necessary training and development as needed.

This policy will undergo an annual review as part of the management review process to ensure its continued relevance and effectiveness.

The Managing Director is responsible for updating the Training and Development Policy to reflect any changes identified during the Company's review process.

Redmond Barry

Managing Director

Date

18/2/2025

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WHISTLEBLOWING POLICY

Key Points

The Whistleblowing Procedure sets out the framework for dealing with allegations of illegal and improper conduct.

Ballycommon is committed to the highest standards of transparency, probity, integrity, and accountability.

This procedure is intended to provide a means of making serious allegations about standards, conduct, financial irregularity, or possible unlawful action in a way that will ensure confidentiality and protect those making such allegations in the reasonable belief that it is in the public interest to do so from being victimised, discriminated against, or disadvantaged.

This procedure does not replace other policies and procedures such as the complaints procedure, the Grievance and Harassment and Bullying Policies and other specifically laid down statutory reporting procedures.

This procedure is intended to ensure that Ballycommon complies with its duty under the Public Interest Disclosure Act 1998.

Scope

This procedure applies to all Ballycommon employees, including Associates and contractors.

This procedure does not replace other Ballycommon policies or procedures. For example, if an employee has a grievance about their working conditions, they should use the Ballycommon Grievance Policy or, if they felt that their manager or a colleague was treating them unfavourably, they should use the Ballycommon Harassment and Bullying Policy. Similarly, if an employee has a concern about the conduct of a fellow employee in the working environment (e.g., that they are not treating colleagues with respect) they

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should raise these with their line manager, or if that is not possible, with the Managing Director

This procedure applies to, but is not limited to, allegations about any of the following:

- Conduct which is an offence or breach of the law
- Alleged miscarriage of justice
- Serious Health and Safety risks
- The unauthorised use of public funds
- Possible fraud and corruption
- Sexual, physical, or verbal abuse, or bullying or intimidation of employees, customers, or service users
- Abuse of authority
- Other unethical conduct

Reporting

Contact Details for Reporting - Ballycommon Managing Director:

mail@ballycommon.co.uk

Ballycommon recognises that the decision to make an allegation can be a difficult one to make. However, whistleblowers who make serious allegations in the reasonable belief that it is in the public interest to do so have nothing to fear because they are doing their duty either to Ballycommon and/or to those for whom Ballycommon or they are providing a service.

Ballycommon will take appropriate action to protect a whistleblower who makes a serious allegation in the reasonable belief that it is in the public interest to do so from any reprisals, harassment, or victimisation.

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Confidentiality

All allegations will be treated in confidence and every effort will be made not to reveal a whistleblower's identity unless the whistleblower otherwise requests. However, if the matter is subsequently dealt with through other Ballycommon procedures such as the Disciplinary Procedure.

Similarly, if the allegation results in court proceedings, then the whistleblower may have to give evidence in open court if the case is to be successful.

Ballycommon will not, without the whistleblowers consent, disclose the identity of a whistleblower to anyone other than a person involved in the investigation/allegation.

Anonymous Allegations

This procedure encourages whistleblowers to put their name to an allegation wherever possible as anonymous allegations may often be difficult to substantiate/prove. Allegations made anonymously are much less powerful but anonymous allegations will be considered at the discretion of the Managing Director.

In exercising discretion to accept an anonymous allegation the factors to be considered:

- The seriousness of the issue raised
- The credibility of the allegation; and
- Whether the allegation can realistically be investigated from factors or sources other than the complainant

Untrue Allegations

No disciplinary or other action will be taken against a whistleblower who makes an allegation in the reasonable belief that it is in the public interest to do so even if the allegation is not substantiated by an investigation. However, disciplinary action may be taken against a whistleblower who makes an allegation without reasonable belief that it is in the public interest to do so (e.g., making an allegation frivolously, maliciously or for personal gain where there is no element of public interest).

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Procedure for Making an Allegation

Allegations should be made to an employee's immediate manager to whom they report. However, this may depend on the seriousness and sensitivity of the issues

involved and who is suspected of the malpractice. The whistleblower may then make an allegation direct to any of the following:

- Ballycommon Managing Director.
- If either of the above receive an allegation he/she will consider the allegation, and after consideration, will discuss with the whistleblower and if they wish to proceed with the allegation will be investigated.
- An independent person or third party may be asked to investigate any allegation and complete the process on behalf of the company.

Allegation

Whether a written or oral report is made relevant information must be provided including:

- The name of the person making the allegation and a contact point.
- The background and history of the allegation (giving relevant dates and names and positions of those who may be able to have contributed to the allegation).
- The specific reason for the allegation. Although someone making an allegation will not be expected to prove the truth of any allegations, they will need to provide information to the person they have reported to, to establish that there are reasonable grounds for the allegation.

Someone making an allegation may be accompanied by either a trade union representative or colleague during any meetings or interviews in connection with the allegation. However, if the matter is subsequently dealt with through another procedure the right to be accompanied will at that stage be in accordance with the relevant procedure.

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Action on receipt of an Allegation

The investigator will record details of the allegation gathering as much information as possible, (in a reasonable timeframe) including:

- The record of the allegation:
- The acknowledgement of the allegation.
- Any documents supplied by the whistleblower

The investigator will ensure the means of communication and contact details that are used with the whistleblower preserves confidentiality.

If the allegation relates to fraud, potential fraud, or other financial irregularity the Managing Director will be informed immediately. The Managing Director will determine whether the allegation should be investigated and the method of investigation.

If the allegation discloses evidence of an alleged criminal offence, it will immediately be reported to the Managing Director and after consideration, appropriate action will be taken including a decision as to whether to inform the Police.

Support

Ballycommon will take steps to minimise any difficulties which may be experienced because of making an allegation. For instance, if a whistleblower is required to give evidence in criminal or disciplinary proceedings Ballycommon will arrange for them to receive advice about the procedure and advise on the support mechanisms that are available.

Ballycommon accepts that whistleblowers need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform those making allegations of the outcome of any investigation.

Responsibility for the Procedure

The Managing Director has overall responsibility for the operation of this Procedure and for determining the administrative processes to be followed and the format of the records to be kept.

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A Register will record the following details:

- The name and status (e.g., employee) of the whistleblower
- The date on which the allegation was received
- The nature of the allegation
- Details of the person who received the allegation
- Whether the allegation is to be investigated and, if yes, by whom
- The outcome of the investigation
- Any other relevant details

The Managing Director will review and report on this Procedure annually.

Redmond Barry
Managing Director

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18/3/2025

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ANTI-SLAVERY POLICY

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. Ballycommon has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business. This policy does not form part of any employee's contract of employment and we may amend it at any time.

Ballycommon is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our organisation. We expect the same high standards from all our suppliers and business partners. This policy applies to all persons working for Ballycommon or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives, and business partners.

Responsibility for the Policy

Ballycommon Managing Director has overall responsibility for ensuring this policy complies with legal and ethical obligations, and that all those under our control comply with it. The Managing Director holds primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. Management at all levels is responsible for ensuring those reporting to them understand and comply with this policy and are given any required training.

Compliance with this Policy

The prevention, detection, and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest a breach of this policy. You must notify your management as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

You are encouraged to raise concerns about any issue of suspicion of modern slavery in any part of our business or the supply chains at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify management.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions constitutes any of the various forms of modern slavery, raise it with management.

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We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our business. If you believe that you have suffered any such treatment, you should inform management immediately.

Communication and awareness of the Policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chain will be given where needed. Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. Ballycommon will terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

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

Redmond Barry
Managing Director

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18/3/2025

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DATA PROTECTION POLICY

Ballycommon is committed to ensuring the privacy and security of all personal data retained. The

The Managing Director is committed to delivering this policy statement and ensuring its understanding and adherence throughout the business. Ballycommon's company structure supports transparent and compliant administration of the General Data Protection Regulations (GDPR), with specific responsibilities for Data Protection assigned to an individual within the organization—the Managing Director.

By implementing defined processes and focusing on risk management, Ballycommon communicates openly with both internal and external customers regarding how their personal data is collected and stored. We only process personal data that is essential for business operations or necessary for compliance with governmental and regulatory bodies to achieve operational, vocational, and administrative standards. This processing may include verifying certain competencies or qualifications necessary for individuals to perform their work.

Personal data will be collected through the completion of the Ballycommon Application Form. All employees will be required to complete the company Data Protection Consent Agreement, which identifies the elements of personal data the company can retain on their behalf. Employees have the right to refuse permission for the company to hold any of their personal data as specified in the Data Protection Consent Agreement. Ballycommon assures employees through this policy that no personal data will be shared with third parties without the express permission of the individual concerned. All personal data will be stored in a password-protected database managed by the individual responsible for Data Protection.

Ballycommon routinely monitors compliance with this policy, regularly reviewing the accuracy of personal data held and providing individuals with opportunities to review and update their information. The quality and accuracy of all personal data is a primary concern, and upon reasonable request, individuals can access their personal data, information on how it was obtained, and details on potential sharing.

Individuals have the right to file a complaint with the Information Commissioner's Office (ICO) if they have concerns regarding the management or processing of their personal data. Initial investigations will be conducted at the senior management level and escalated to the Managing Director if an acceptable resolution is not achieved.

Ballycommon ensures that all consent mechanisms used in the consent process are clear and unambiguous. Individuals are provided every opportunity to indicate their agreement positively and are given the chance to decide without assumptions of acceptance by default.

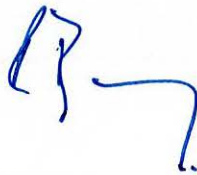
Data security is of paramount importance to Ballycommon as a safeguard against data breaches. Our systems are constantly monitored, audited, and assessed to detect potential breaches. Any breach that may involve harm, monetary loss, or damage resulting from identity theft or confidentiality violation will be reported to the ICO. Currently, Ballycommon does not operate internationally; however, if our business expands internationally, this policy will be updated and distributed through the appropriate channels.

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

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The Managing Director is responsible for ensuring that the Data Protection Policy is updated to reflect any changes identified during the company's review process.

Redmond Barry
Managing Director



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