



**Environmental  
Management  
Services**

## **ANTI-BRIBERY POLICY**

*At Geo Pollution Technologies, we recognise that bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust.*

*To clarify:-*

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

*It is our policy to conduct all of our business in an honest and ethical manner.*

*We take a zero tolerance approach to bribery and corruption.*

*We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate.*

*We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate.*

*However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both within the UK and abroad.*

*Bribery and corruption are punishable for individuals by up to ten years imprisonment and a fine.*

*Any employee that is approached by a third party to undertake any kind of activity involving bribery, must report it immediately, failure to do so will be subject to disciplinary action.*

*If we are found to have taken part in corruption, we understand that we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation.*

*We therefore take our legal responsibilities very seriously.*

Signed 

*Date: 04/2018*

*Ian McDonald – Managing Director*

*Next Review Date: 04/2019*

***Geo Pollution Technologies (UK) Limited***



## **ANTI-CHILD LABOUR POLICY**

### ***1. Introduction***

#### ***Defining Child Labour***

*Child Labour represents hazardous forms of work that disrupt the healthy development of a child. Child labour can limit or damage the physical, mental, social or psychological development of children and undermine a child's right to childhood, development and education. The company recognizes its responsibility to take an effective role in reducing child labour.*

#### ***Hazardous work***

*Any work which is likely to jeopardize children's physical, mental or moral health, safety or morals should not be done by anyone under the age of 18 or (16 under strict conditions)*

#### ***Basic Minimum Age***

*The minimum age for work should not be below the age for finishing compulsory schooling, which is generally 16.*

#### ***Light work***

*Children between the ages of 13 and 16 years old may do light work, as long as it does not threaten their health and safety, or hinder their education or vocational orientation and training.*

***Geo Pollution Technologies (UK) Ltd*** is firmly committed to creating strong business growth, which is not achieved at the expense of the environment, quality of life or social equity. The Company will comply with all relevant and applicable local and international labour regulations, treaties, conventions and principles relating to the protection, welfare and health & safety of children. Furthermore, the Company will not employ any person deemed by local or international laws, conventions or regulations to be a child in any capacity in any industrial operation under its control.

***Geo Pollution Technologies (UK) Ltd*** acknowledges that in the course of carrying out its basic duties; without the knowledge of management; employers may indulge their children; it is sometimes customary for children to play a part in the day-to-day work for the fun of it due to the fact that children have an affinity for work and activity. Nevertheless, the Company aims to apply this anti-child labour policy through education and strict supervision seeking to ensure that:

- a) The welfare and health & safety of children are paramount at all times.*
- b) Any forms of practice undertaken by children for the development of craft skills and for the purposes of play do not conflict with or impede their proper educational development including school attendance.*

*The objective of the policy is to set out the ways in which the company will:*

- *Prevent child labour within its operations and supply chain*
- *Approach incidences where child labour is identified*

## **2. Implementation**

### ***Efforts to Reduce the Engagement of Child Labour in the Taskforce***

- *Comply with national law on child labour and minimum age.*
- *Comply with the Convention on the Rights of the Child.*
- *Not use or support the use of child labour*
- *Prohibit and seek to eliminate the worst forms of child labour*
- *Not work with those who use child labour – unless an elimination plan is in place.*
- *Base decisions about child labour on expert advice about the options available to children in the local context, and the best interests of the children affected*
- *Educate employees and all staff on child labour and its negative impacts in the work environment and on society as a whole.*

### ***Education and vocational work for children***

*Promote education for children of school age via the use and promotion of work experience among other initiatives.*

Signed



*Ian McDonald – Managing Director*

*Date: 04/2018*

*Next Review Date: 04/2019*

***GEO Pollution Technologies (UK) Ltd***



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## **ANTI-SLAVERY AND HUMAN TRAFFICING POLICY**

### ***Definition***

*Modern slavery is a crime and a violation of fundamental human rights in both law (Modern Slavery Act 2015) and moral obligation. It can take various forms, such as slavery, servitude, forced & compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or financial gain.*

### ***Policy Statement***

*GPT have a zero tolerance attitude to modern slavery and we are committed to acting ethically & with integrity in all our business activities and relationships. While implementing effective systems and control measures to ensure modern slavery is not taking place anywhere within our own business or in any of our supply chains.*

*GPT are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our directly employed staff, contractors, suppliers and other business partners.*

### ***Implementation***

*This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives and business partners.*

*The managing director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Compliance Manager has the day today responsibility for implementation and effectiveness of the policy.*

Signed

Ian McDonald – Managing Director

Date: 04/2018

Next Review Date: 04/2019

**GEO Pollution Technologies (UK) Ltd**



# Environmental Management Services

## **Carbon Footprint Policy**

*It is the stated policy of Geo Pollution Technologies (GPT) to reduce its environmental impact where practicable.*

*Carbon reducing measures form an integral part of the overall Company strategy, helping to improve both operational performance and a reduction in potentially harmful emissions to land, water and air. The company's ultimate aim is to reduce its carbon footprint to the lowest possible figures achievable by December 2020, or before, where practical.*

***To help achieve this, the company will;***

- *Comply with all current energy legislation, seeking to meet or better legislative targets*
- *Minimise waste, promote recycling, and use of recycled products to help reduce the burden on landfill, and therefore methane generation.*
- *Continue to promote and design energy efficient and therefore carbon reducing systems and equipment on behalf of our clients.*
- *Promote environmental awareness and responsibility amongst employees and others, and will seek, where practicable, to continuously improve company environmental performance.*
- *Continue to monitor Environmental performance of the business via KPI's*
- *Completion of performance reviews for the benefit of our clients and stakeholders.*

*This carbon footprint policy statement underpins the existing environmental, sustainable procurement and waste management policy*

Signed

Ian McDonald – Managing Director

Date: 04/2018

Next Review Date: 04/2019

**GEO Pollution Technologies (UK) Ltd**



**Environmental  
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## **Counterfeit, Fraudulent and Suspect Items (CFSI) Policy**

*At Geo Pollution Technologies (GPT) we understand that safety can be compromised during the use of counterfeit or fraudulent equipment. Safety is our overriding priority and we regard the cooperation of our supply chain throughout the tiers as essential to maintain the highest standards for all the goods and services we supply and/or use.*

*Geo Pollution Technologies (GPT) management understand the potential risks concerning the supply of Counterfeit, Fraudulent and Suspect Items (CFSI) within the supply chain and directly to our employees. In order to mitigate the effects of CFSI we only promote the use of suppliers that can demonstrate the quality and source of the goods that we require.*

*All our employees involved in the purchasing or hiring of goods have been informed about the potential for CFSI and are advised that all goods must be either purchased or hired directly from the manufacturers or from a reputable and official distribution channels.*

Signed

*Ian McDonald – Managing Director*

*Date: 06/2018*

*Next Review Date: 06/2019*

***GEO Pollution Technologies (UK) Ltd***



**Environmental  
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## **Diversity and Equality Policy**

*The purpose of this policy is to provide diversity and equality to all in employment, irrespective of their gender, race, ethnic origin, disability, age, nationality, national origin, sexuality, religion or belief, marital status and social class. We oppose all forms of unlawful and unfair discrimination.*

*All employees, whether part time, full time or temporary, will be treated fairly and equally.*

*Selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability.*

*All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the organisation.*

### ***Our commitment:***

- *Every employee is entitled to a working environment which promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.*
- *The commitment to diversity and equality in the workplace is good management practice and makes sound business sense.*
- *Breaches of our diversity and equality policy will be regarded as misconduct and could lead to disciplinary proceedings.*
- *This policy is fully supported by all staff and including the management and the managing director.*
- *The policy will be monitored and reviewed annually.*
- *The policy is implemented by making all employees aware of our policy and ensuring they abide by it. On the policies enactment all employees were given a copy and a copy is clearly presented in our foyer.*
- *If any employee feels that they or any other member of staff has been treated in a way which breaches this policy complaints should be made to a member of the management team.*

### ***The law***

*This policy will be implemented within the framework of the Equalities Act (2010)*

Signed  
Ian McDonald – Managing Director

Date: **04/2018**  
Next Review Date: **04/2019**

**GEO Pollution Technologies (UK) Ltd**



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## **ALCOHOL AND DRUGS POLICY**

### **Purpose and scope**

*In this policy:*

1. 'staff' refers to all individuals working for us at every level or grade, whether they are they are directors, officers, partners, employees, workers, contractors, consultants, agency workers, volunteers, trainees or on work experience.
2. 'drugs' refers to controlled substances, and prescribed or over-the-counter medication and legal highs which are being, or are intended to be, misused or used contrary to medical instructions or advice.
3. 'controlled substances' refers to drugs that are unlawful under criminal law.

*The consumption of alcohol or drugs can be the cause of serious problems within the workplace. Staff who drink or take drugs are more likely to work inefficiently, be late to or absent from work, suffer from impaired concentration, coordination, judgment or decision making, have work-related accidents and endanger their colleagues and members of the public.*

*In addition, the use of alcohol or drugs by staff increases the likelihood of acts of misconduct or criminal behaviour that may have an adverse effect on the morale of other members of staff or relationships with co-workers or damage our reputation and/or business.*

*Taking even small amounts of alcohol or drugs before or whilst working will affect work performance, and there could be serious health and safety consequences. Staff driving to work after a night's heavy drinking may have blood alcohol levels in excess of the legal limit and may be unfit to drive or perform their duties and may pose a risk to the health and safety of others.*

*We have an overriding duty to protect the health, safety and welfare of all members of staff and any visitors to the workplace and anyone who may be affected by our activities.*

*This policy aims to deal with alcohol or drug use (whether continuous or irregular and including the proper and lawful use of over-the-counter medicine and prescribed medication) by individual members of staff which affects their conduct, attendance, performance or productivity.*

### **Prescribed medication**

*Use of prescribed or over-the-counter medicines (even when used correctly in accordance with instructions or advice) might have a detrimental effect on staff performance, conduct or the ability to undertake certain duties.*

*Staff taking prescribed or over-the-counter medicines should seek advice or information from their GP or a pharmacist regarding the possible side effects and whether they should avoid performing any of their duties, such as using machinery or driving*

*Where appropriate, staff should immediately inform their line manager of any possible side effects of their medication, and/or discuss any problems they may have with performing their duties. We reserve the right to require the member of staff to provide us with a medical report from their GP in circumstances where they have been told not to continue to undertake all or part of their duties.*

## **Providing advice and support**

*We recognise that, for a number of reasons, members of staff could develop alcohol or drug-related problems.*

*It is our intention to deal constructively and sympathetically with staff who have alcohol or drug-related problems, such as alcohol or drug dependency.*

*When it is known that a member of staff has an alcohol or drug problem, the primary objective of any discussions will be to assist them with the problem in as compassionate and constructive a way as possible.*

*If a member of staff admits to having alcohol or drug-related problems they should be encouraged by their line manager to seek treatment or rehabilitation. If the member of staff agrees to this, they should be informed of what support can be provided.*

*Depending on the circumstances, consideration should be given to:*

- 1. Referral to an occupational health therapist or other appropriate treatment provider in conjunction with their GP.*
- 2. Time off work to attend any recommended treatment by their GP or a medical/rehabilitation specialist and whether it should be treated as sick leave.*
- 3. Temporary re-allocation to other duties before, during and/or after rehabilitation.*
- 4. Suspension of any on-going disciplinary action in accordance with our disciplinary or capability procedures pending the outcome of the treatment or rehabilitation.*

*If after receiving help and support, the situation has not improved, the member of staff should be advised of the implications of any continuing problems with their performance, conduct or absence and should be given an indication of how the situation will be monitored and for how long.*

*Staff who unreasonably deny having alcohol or drug-related problems should be informed of the required improvements to their performance, behaviour or absence record (as appropriate), how the situation will be monitored and for how long.*

*If there is no improvement within the timescales given, the line manager must contact the head of Human resources, who may proceed to take action in accordance with our disciplinary or capability procedures.*

*If the member of staff refuses to seek help or discontinues a programme of treatment, this should not in itself provide grounds for disciplinary action. However, any unacceptable conduct, performance, absences or any conduct (whether due to actions or inactions by the member of staff) that poses a risk to the health and safety of other staff or members of the public, will be dealt with using our normal disciplinary or capability procedures.*

## **Confidentiality**

*Any discussions with a member of staff concerning their alcohol or drug-related problems and the record of any treatment or other action taken to resolve their problem will be treated as being strictly confidential, unless the member of staff agrees otherwise.*

*However, there may be times when we will need to disclose some confidential information in order to protect the health and safety of other staff or the general public. If we need to disclose any confidential information we shall take all reasonable steps to provide the member of staff with advance warning of this and to let him/her know what information will be disclosed, to whom and the reasons why.*

## **Prohibition of alcohol and drug consumption in the workplace**

*During working hours*

*All members of staff should be fit and capable of performing all their duties and responsibilities on arrival at work.*

*Staff must not:*

- 1. Bring alcohol or controlled substances onto, or consume alcohol or drugs on, our premises or our clients premises at any time.*

- 2. Drink alcohol or take drugs that may affect their ability to drive if they are required to drive in the course of performing their duties.*
- 3. Drink alcohol or take drugs that may affect their ability to carry out their duties during their working day, whilst on breaks or at lunchtime, without obtaining the prior authority of his/her line manager.*
- 4. Drink alcohol or take drugs that may affect their ability to carry out their duties whilst they are on operational standby or when undertaking on-call duties.*
- 5. Drink alcohol or take drugs that may affect their ability to carry out their duties at meetings, conferences, exhibitions or media or social events taking place during the working day whether on our premises or at another site without obtaining the prior authority of his/her line manager.*

#### *Representing the business after working hours*

*Staff representing us at business/client functions, conferences, exhibitions, or at media or social events outside normal working hours:*

- 1. Will be deemed to still be at work.*
- 2. May only drink moderately if drinking alcohol, and are expressly prohibited from possessing controlled substances or using drugs. that may affect their ability to carry out their duties*
- 3. Must ensure they are well within the legal limits if they are driving.*
- 4. Must ensure that they remain professional at all times and must not, by their conduct, actions or inactions, detrimentally affect our business or reputation.*

#### *After work*

*Staff activities after normal working hours and away from our premises are, of course, generally a personal matter and do not directly concern us.*

*Concern will arise if, because of the pattern or amount of drink or drugs involved, a staff member's attendance, work performance or conduct at work deteriorates or if their conduct damages the reputation of our business.*

#### **Disciplinary action**

*Disciplinary action will be taken in the following circumstances:*

- 1. If a member of staff is found to have breached any of the above mentioned restrictions regarding the consumption of alcohol or use of drugs.*
- 2. If misconduct takes place at work as a result of drinking alcohol or taking drugs.*
- 3. If a member of staff is found, in the reasonable opinion of his/her line manager, to be under the influence of alcohol or drugs whilst at work. This could, for example, include circumstances where the member of staff has not committed an act of misconduct but is incapable of properly performing all or some of their duties to our required standards.*
- 4. If a member of staff is believed to be buying or selling drugs on our premises.*
- 5. If a member of staff is found to be in possession of controlled substances on our premises.*
- 6. If the consumption of alcohol, use of drugs or possession of controlled substances by a member of staff damages the reputation of our business.*

*A breach of any of the above mentioned restrictions is a disciplinary offence and depending on the seriousness of the offence, it may amount to gross misconduct and could result in summary dismissal.*

*Any disciplinary action will be dealt with in accordance with our disciplinary procedures.*

*Staff found to be in possession of or selling controlled substances at work will be immediately reported to the Police.*

*We reserve the right to arrange for the member of staff to be escorted from our premises immediately, and sent home without pay for the rest of the day or shift if we believe that they have breached this policy.*

### **Alcohol and drug testing**

*We reserve the right to carry out random alcohol and drug screening tests on those members of staff whose activities and job duties may have a significant impact on the health and safety of our workforce, our clients work force or members of the public*

*If a member of staff receives a positive test result this will be viewed as a gross misconduct offence, and potentially render them liable to summary dismissal in accordance with our disciplinary procedures.*

*Unreasonable refusal to submit to an alcohol or drug screening test will also be dealt with through our disciplinary procedures.*

### **Searches**

*We reserve the right to search our premises for evidence of any breach of this policy, which includes, without limitation, staff lockers, cabinets, desks.*



*Signed*

*Ian McDonald – Managing Director*

*Date: 04/2018*

*Next Review Date: 04/2019*

***GEO Pollution Technologies (UK) Ltd***



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## FAIR TRADE POLICY & PROCEDURE

### 1.0 Scope and Purpose

- *This policy and procedure is applicable to all **Geo Pollution Technologies** and Suppliers to **Geo Pollution Technologies***
- *This policy and procedure must be followed by any **Geo Pollution Technologies** staff procuring or consuming goods or services either on our site or working off-site in the service of **Geo Pollution Technologies**.*

### 2.0 Key Responsibilities

- *Sales, Marketing & Admin have a responsibility for overseeing the implementation and monitoring of this policy.*
- *Admin has a key role in ensuring Fair Trade and sustainability feature as part of the evaluation of supplier tenders.*
- *Support from the top of the organization downwards is imperative as Fairtrade goods may not always be the cheapest on offer.*

### 3.0 Policy

#### 3.1 Education

*It is recognised by the company that there is an important educational as well as an ethical justification for supporting and promoting Fair Trade. This aligns with our commitment to sustainable development and education for sustainable development. Recognising the fact that we advocate a global perspective and sustainability within the curriculum, it is important that the company supports sustainable development when it conducts its business.*

#### 3.2 Sale of Fairtrade Products

*The current business activities undertaken by **Geo Pollution Technologies** do not utilise fairly traded products; however, if business activities are to change, it is **Geo Pollution Technologies** aim to ensure products sold are from fairly traded sources.*

#### 3.3 Procurement

*Hospitality:*

*The company will always try serve Fair Trade beverages (e.g. tea and coffee, including sugar) at all internal meetings and hospitality events (e.g. open days), with a commitment to increasing the use of Fair Trade products as it becomes possible to do so.*

Signed

Ian McDonald – Managing Director

Date: 04/2018

Next Review Date: 04/2019

**GEO Pollution Technologies (UK) Ltd**



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## **HAND ARM VIBRATION (HAVS) POLICY & PROCEDURE**

*At Geo Pollution Technologies (UK) Ltd, we recognise that Hand Arm Vibration and associated work related upper limb disorders can be caused by the use of vibrating and rotary power tools.*

*To clarify:-*

*The company has a strategy to manage and monitor the use of the equipment that has been identified to cause the condition.*

*All company power tools that have been identified as required to carry out the work tasks have been assessed.*

*A matrix has been produced and issued to the safety file of all vans in addition to being available to all staff in the office.*

*All staff that hire equipment are required to request the (HAVS) information of the tool at the point of hire, the person in charge of the work must include the information in the Risk Assessment and inform the staff of the findings.*

*It is the responsibility of the management to ensure that all tasks that involve the use of power tools are suitably assessed and exposure reduced to a minimum at the planning stage.*

*Critical worker Occupational screening will include a Level 1&2 Initial HAVS assessment; any reported symptoms will be referred for a level 3 assessment.*

*The company has a programme in place to continually assess work methods and reduce the exposure to employees.*

*Signed*

*Ian McDonald – Managing Director*

*Date: 04/2018*

*Next Review Date: 04/2019*

***GEO Pollution Technologies (UK) Ltd***



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## **Internet Privacy Policy**

*Geo Pollution Technologies (UK) Ltd operates [www.GPTenvironmental.co.uk](http://www.GPTenvironmental.co.uk) This page informs you of our policies regarding the collection, use and disclosure of Personal Information we receive from users of the Site.*

*We use your Personal Information only for monitoring and improving the Site. By using the Site, you agree to the collection and use of information in accordance with this policy.*

### **Log Data**

*Like many site operators, we collect anonymous information that your browser sends whenever you visit our Site ("Log Data").*

*This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, the pages of our Site that you visit, the time and date of your visit, the time spent on those pages and other statistics.*

*In addition, we use the third party service Google Analytics to collect, monitor and analyse the data in order to improve the effectiveness of our website.*

### **Communications**

*Should you contact us via the "email us" form we will use your personal information to contact you in regards to your query. Additionally, if you opt in on that form with the checkbox provided we may contact you with newsletters, marketing or promotional materials.*

### **Cookies**

*Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive. Like many sites, we use "cookies" to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent.*

### **Security**

*The security of your Personal Information is important to us, but remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.*

### **Contact Us**

*If you have any questions about this Privacy Policy, please contact us.*

Signed 

Sam Chick – Marketing Manager

Date: 05/2017

Next Review Date: 05/2018

**GEO Pollution Technologies (UK) Ltd**



## SOCIAL MEDIA POLICY

### 1.0 BACKGROUND

The **Geo Pollution Technologies** Social Media Policy is intended to provide all directors and employees (collectively, "Employees") of **Geo Pollution Technologies** with a basic policy on their use of social media. Social media is a valuable, easy-to-use service and tool. However, using it in the wrong way not only may damage consumer confidence in **Geo Pollution Technologies** and the **Geo Pollution Technologies** brand image, but could even lower confidence so far as to endanger **Geo Pollution Technologies** existence as a company.

For the purpose of compliance, **Geo Pollution Technologies** has established the **Geo Pollution Technologies** Code of Conduct prescribing our basic concept for fulfilling corporate social responsibility, and based upon the **Geo Pollution Technologies** Code of Conduct, the **Geo Pollution Technologies** General Principles prescribing our guidelines for corporate and employee actions. The Social Media Policy is based on the Code of Conduct and the **Geo Pollution Technologies** General Principles and sets out important considerations for Employees of **Geo Pollution Technologies** in their use of social media.

### 2.0 SOCIAL MEDIA POLICY

#### 2.1 SCOPE

Every Employee of **Geo Pollution Technologies**, regardless of his/her organisational unit or form of employment, will comply with all of the followings.

#### 2.2 To realize that what is said as a private person may be understood as spoken on behalf of **Geo Pollution Technologies**.

- To remember that he/she is an Employee of **Geo Pollution Technologies** and take care not to mislead his/her readers into thinking that he/she is speaking on behalf of **Geo Pollution Technologies**, whether or not he/she mentions to of **Geo Pollution Technologies** in the post.
- To avoid stating his/her personal opinions or views in a way that may be interpreted as a public statement made on behalf of **Geo Pollution Technologies**.

#### 2.3 Compliance with applicable laws and regulations and **Geo Pollution Technologies** regulations.

To comply with laws and regulations, and **Geo Pollution Technologies** regulations, and not to infringe any intellectual property right or other right of others

2.4 To be honest and responsible.

- To be responsible for what he/she has posted.
- To realize that his/her post may be seen by an unspecified large number of people and respect those readers may make their own individual interpretations on his/her post.
- To be aware that highly emotional communication is very likely to prolong useless argument, increase misunderstanding and make the situation worse.
- To respect the rights of the person he/she is posting about and the opinions of his/her readers.
- Not to post anything that offends accepted social standards of decency • Not to post anything that offends accepted social standards of decency.

2.5 To respect the confidentiality of certain information.

- Not to post any personal or confidential business information about **Geo Pollution Technologies** or **Geo Pollution Technologies** stakeholders.
- Not to post any information that is not publicly available and is learned in the course of his/her jobs.

2.6 To realize that information once posted online cannot be deleted

- To make a post upon the understanding that Information once posted online may be unable to completely delete and may be publicly available for a long time.

2.7 To realize how fast information spreads online

To make a post upon the understanding that it is quite easy to copy and cite the information posted online and it may fast spread to other media

**3.0 To our customers and other users of social media sites**

3.2 Posting by other customers.

Please be aware that any post made by any Employee of **Geo Pollution Technologies** at other than the **Geo Pollution Technologies** customer account is not necessarily a public statement or view of **Geo Pollution Technologies**.

Signed



Ian McDonald – Managing Director

Date: 04/2018

Next Review Date: 04/2019

**GEO Pollution Technologies (UK) Ltd**



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## **Sustainable Procurement Policy**

*It is the stated policy of Geo Pollution Technologies to reduce its environmental impact where practicable.*

*Sustainable Procurement form an integral part of the overall Company strategy, helping to improve both operational performance and a reduction in potentially harmful emissions to land, water and air, while supporting local businesses.*

### ***To help achieve this, the company will;***

- *Promote the use of local businesses for the purchasing of goods where practical, ideally sourcing goods within a 10mile radius of a job site.*
- *Aim to always source wood products from Forest Stewardship Council (FSC) accredited sources.*
- *Promote good logistical planning for the delivery of goods and services.*
- *Aim to purchase Fairly Traded goods in line with the Fair Trade Policy.*
- *Set up a file of approved suppliers who have been rigorously checked for Environmental, Health and Safety and Quality standards.*

*This Sustainable Procurement policy statement underpins the existing Environmental, Carbon Footprint and Fair Trade policy.*

Signed

Ian McDonald – Managing Director

Date: **04/2018**

Next Review Date: **04/2019**

**GEO Pollution Technologies (UK) Ltd**



## **Tax Evasion Code of Conduct Policy Statement**

### **Summary**

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*This code of conduct summarises the procedures of Geo Pollution Technologies (UK) Ltd and its subsidiaries to ensure all Geo Pollution Technologies (UK) Ltd associated persons, including employees and those acting on our behalf, do not facilitate tax evasion.*

### **Statement**

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*Tax evasion, tax fraud and attempts to facilitate such actions are antithetical to the ethos of Geo Pollution Technologies (UK) Ltd. Such actions reduce the amount of revenue the government needs to create the conditions for our business to flourish. It amounts to little more than stealing from our customers and from ourselves. Geo Pollution Technologies (UK) Ltd is committed to no tolerance for tax evasion, and we are committed to a dedicated programme to counter the risk of any employee, contractor, business partner or representative of our company engaging in the criminal facilitation of tax evasion.*

*We expect everyone who works with our company to fully comply with their tax obligations. We will not tolerate, permit or allow any person associated with us to engage in the facilitation of tax evasion or tax fraud by any of our customers, suppliers, business partners, contractors or employees anywhere in the world.*

*Geo Pollution Technologies (UK) Ltd is committed to complying in full with the tax laws everywhere we operate, and we choose to do this by respecting not only the letter of the law, but the spirit of the underlying tax policy intent. We aim to pay the right amount of tax at the right time, on all the eligible profits we make.*

### **Accountability & Governance**

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*Top management, consisting of directors and senior management have approved this policy and our commitment to no tolerance of tax evasion or its facilitation. This director is responsible for monitoring compliance with this policy and is supported by his senior manager.*

## **Employee responsibilities**

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*Our code of conduct sets the standards of behaviour we expect all employees to adhere to. Our employees have a responsibility to take reasonable action to prevent harm to Geo Pollution Technologies (UK) Ltd and we hold our employees accountable for their actions and omissions. Any actions that breach the Criminal Finances Act and the tax laws of wherever we operate brings harm to Geo Pollution Technologies (UK) Ltd and will not be tolerated.*

*You are responsible for properly following Geo Pollution Technologies (UK) Ltd policies and procedures. These should generally ensure that all taxes are properly paid. If you are ever asked by anyone either inside or outside our company to go outside our standard procedures, this should be reported without delay, as someone may be attempting to evade tax.*

*Any employee who has any concerns relating to any potential breach of this policy must immediately follow our whistleblowing policy and report the matter without delay.*

## **Our assessment**

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*Our assessment covers the categories of business operations we are involved in where there is a risk of tax evasion.*

### ***High risk areas for our business include:***

- *Accounts payable*
- *Accounts receivable*
- *Payment to contractors*

### ***The key factors which may increase risk include:***

- *Cash transactions*
- *Transactions in certain regions of the world.*

### ***Accounts Payable***

- *Only contract with businesses which have good reputations.*
- *Ensure all information on an invoice is correct and as expected.*
- *Have the full contact details of the supplier and ensure it matches to where the payment is being made.*
- *Specify in contacts that VAT and other sales taxes must be added to invoices and have written reasons why such added taxes are not required.*

- *Do not pay suppliers in cash. If cash payments must be made, ensure they are properly invoiced and a receipt is supplied.*

### **Accounts Receivable**

- *Ensure correct procedures are followed.*
- *Do not process off-system invoices.*
- *Ensure all invoices have the correct VAT coding.*

### **Contractors**

- *Any wage payments outside of payroll must be expressly approved.*
- *Where tax is required to be deducted at the source this must be done.*
- *Payments to contractors should only be made in strict accordance with company policies.*
- *Cash payments should not be made. If they are, invoices and receipts must be present.*
- *Any tax related withholdings must be deducted and recorded.*
- *Payments without deductions should only be made if there is a reasonable expectation that the recipient will meet their tax obligations.*

### **Our commitment**

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*Geo Pollution Technologies (UK) Ltd is committed to the following principles:*

- *Our business is carried out fairly, honestly, and openly in every part of our work.*
- *Our values inform everything we do.*
- *We will never sell any product or service where we know or suspect that any aspect of the transaction is being misused, abused or otherwise corrupted for the purposes of tax evasion.*
- *We will never buy any product or service from any supplier where it is known or suspected that any aspect of the transaction is being misused, abused or otherwise corrupted for the purposes of tax evasion.*
- *We will immediately terminate any agreement or business relationship as soon as our company learns of or suspects tax evasion may be taking place.*
- *We will not progress any business opportunity where there is any suspicion that any aspect of it may involve tax evasion.*

- *We will not do business with others who do not also hold to at least the same standard of preventing tax evasion.*
- *Our company will regularly monitor and review this policy.*
- *Any employee found in breach of this policy will be subject to disciplinary action.*
- *We will not tolerate any contractor, business partner, representative or other third party associated with us failing to uphold this policy.*
- *No employee will suffer demotion, penalty, or any other adverse action for reporting any breach of this policy or from refusing to carry out an action which may lead to a breach of this policy.*

Signed   
Ian McDonald Managing Director

Date: **01/2018**  
Next Review Date: **04/2018**



**Environmental  
Management  
Services**

## **Welsh Language Policy 2018**

*At Geo Pollution Technologies we are committed to the fact that the Welsh language has official status, and should be treated no less favourably than the English language.*

*Geo Pollution Technologies understand that it makes good business sense to provide services in the language of choice of our customers. At Geo Pollution Technologies we also consider it to be respectful to our employees to encourage and facilitate the use of their chosen language.*

*At Geo Pollution Technologies we try and make progress towards achieving this ambition, and this Policy outlines our current commitments in relation to using Welsh while where appropriate, sets targets to help us develop the use of Welsh.*

*Geo Pollution Technologies commitments to this policy should be construed practically, and understood they are restricted to activities and services in Wales, for Welsh people, within our influence and control.*

### **Corporate Identity**

*Our corporate brand is in English only.*

### **Advertising and Marketing**

*Generally, our advertising is in English only. Our recruitment advertising is in English only, although Welsh language translations are available.*

### **Correspondence**

*At the moment, we generally communicate to people in English (Both written and verbal). We recognise our clients' choice to correspond with us in Welsh and we will endeavour to respond in their preferred language.*

### **Awareness**

*This policy will be available to the public and staff alike.*

### **Leadership**

*We will ensure that this policy is supported by the managing director.*

Signed

*Ian McDonald – Managing Director*

*Date: 04/2018*

*Next Review Date: 04/2019*

**GEO Pollution Technologies (UK) Ltd**



## WHISTLEBLOWER PROTECTION POLICY

*Geo Pollution Technologies (UK) Ltd requires directors, managers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of Geo Pollution Technologies, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.*

*This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that Geo Pollution Technologies can address and correct inappropriate conduct and actions. It is the responsibility of all directors, managers, and employees to report concerns about violations of Geo Pollution Technologies code of ethics or suspected violations of law or regulations that govern Geo Pollution Technologies operations.*

*It is contrary to the values of Geo Pollution Technologies for anyone to retaliate against any directors, managers or employee who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of Geo Pollution Technologies. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.*

*Geo Pollution Technologies has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the General Manager, or a Director. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to Geo Pollution Technologies General Manager, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or the Managing Director.*

*Geo Pollution Technologies General Manager is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The General Manager will advise the Managing Director of all complaints and their resolution and will report at least annually on compliance activity relating to accounting or alleged financial improprieties to the*

*Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.*

*Geo Pollution Technologies Manager will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.*

Signed

A handwritten signature in blue ink, appearing to read 'Ian McDonald'.

Ian McDonald – Managing Director

Date: 04/2018

Next Review Date: 04/2019

**GEO Pollution Technologies (UK) Ltd**