

TOUCH POINT MEDIA POLICY SUMMARY

ENVIRONMENTAL

Touch Point Media promotes a proactive and responsible attitude towards the Environment throughout the company and within the supply chain.

In this respect the Company has a formal and structured approach that is summarised in the following objectives:

Objectives

- To operate a management system, which is effective and in compliance with environmental good working practice based on the requirements of ISO 14001:2015.
- Develop and monitor target driven measurable management programmes for waste and pollution prevention.
- Develop processes and procedures that support professional and responsible practices.
- Provide a controlled, safe and environmentally friendly workplace.
- Identify applicable aspects, reduce impacts and maintain relevant Legislative and Statutory compliance.

SUSTAINABILITY

Touch Point Media is committed to promoting sustainability and aims to follow and promote good sustainability practices resulting in reduced environmental impacts of all our activities and to help our customers and partners to do the same.

Principles

Our Sustainability Policy is based upon the following principles:

- Comply with and exceed, where practicable, all applicable legislation, regulations and codes of practice.
- Integrate sustainability considerations into all our business decisions.
- Ensure that all staff are fully aware of and committed to our Sustainability Policy.
- Minimise the impact on sustainability of all office and transportation activities.
- Make customers and suppliers aware of our Sustainability Policy and encourage them to adopt sound sustainable management practices.
- Review and to strive to improve our sustainability performance.
- Practical steps - In order to put these principles into practice we:

Travel and meetings

- Use alternative sustainable forms of transport wherever possible and / or practicable.
- Share transport if possible. • Where the only practical alternative is to fly, we will purchase appropriate offsets.
- Avoid or reduce physically travelling to meetings etc. where alternatives are available and practical, such as using teleconferencing or video conferencing, and efficient timing of meetings to avoid multiple trips.
- Reduce annual car mileage and purchase appropriate offsets for all staff business and personal mileage.
- Replace company vehicles with more efficient models as they become due for replacement.

Purchase of equipment and consumption of resources

- Minimise our use of paper and other office consumables, for example by reusing and double printing on paper used and identifying opportunities to reduce waste. Purchase office paper produced from sustainable sources.
- Issue documents electronically wherever possible.
- Where possible arrange for the reuse or recycling of waste such as non-confidential paper etc.

- Reduce the energy consumption of office equipment by purchasing energy efficient equipment and good housekeeping.
- Wherever possible use rechargeable batteries and recycle non-rechargeable batteries.
- Investigate the opportunity for energy generation from renewable resources.
- Purchase electricity from a supplier committed to renewable energy. Seek to maximise the proportion from renewable energy sources, whilst also supporting investment in new renewable energy schemes.
- Purchase fair trade and/or organic products wherever possible.

QUALITY MANAGEMENT

It is the policy of this Company to provide a service and supply products that meet all of the agreed requirements of our customers. This commitment relates to all company personnel and activities and evolves from the following key foundation benchmarks:

- QUALITY ISO 9001 QUALITY MANAGEMENT SYSTEMS
- ENVIRONMENT ISO 14001 & THE ENVIRONMENTAL PROTECTION ACT 1990
- HEALTH & SAFETY ISO 45001 & THE HEALTH AND SAFETY AT WORK ACT 1974

Our company will progress across all aspects of the business and will utilise the following objectives as a vehicle to continually improve

- Establish, implement and operate a Management System, which is effective and in compliance with ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018.
- Maintain legal and regulatory compliance appropriate to our business.
- Identify and manage applicable risks, hazards and aspects and wherever possible reduce their probability and impacts.
- Provide a superior service and to exceed where possible expectations.
- Treat our customers, employees, suppliers and the community ethically and with respect.
- Ensure the organisation is trained and competent to fulfil their job function to strive for flexibility, simplicity and teamwork.
- Develop and monitor measurable management improvement programmes.
- Provide a well-managed, safe and environmentally friendly workplace.

HEALTH AND SAFETY

It is Company Policy that activities carried out by the company are in accordance with the requirements of the Health and Safety at Work Act 1974. The company accepts its responsibilities as an Employer towards its employees and any other person who may be affected by the work undertaken by the company. The Company also aims to limit adverse effects on or adjacent to land where its work activities are carried out. The Company will as far as is reasonably practicable aim to:

- Provide and maintain safe and healthy working environments that are without risk to health, safety and welfare.
- Provide training and instruction to enable employees to perform their work safely and efficiently.
- Consider safety at all stages from quotation stage to completion by setting standards that comply with the relevant statutory requirements relating to health, safety and welfare with regard to the effect on employees, contractors, visitors and the public.
- Make a priority of risk avoidance or reduction to safeguard employees and others from foreseeable hazards connected with work activities, processes and working systems.
- Make available necessary safety devices and protective equipment and supervise their use.
- Ensure that when new substances, plant, equipment, processes or locations are introduced that adequate guidance, instruction, training and supervision are provided for safe methods of work to be developed.
- Train all employees to be aware of their own responsibilities in respect of relevant health and safety matters and ensure they participate in the prevention of accidents and co-operate in the control of occupational and non-occupational disorders and diseases.
- Maintain a continuing interest in health and safety matters applicable to the Company's activities and to co-operate with the appropriate authorities and technical organisations to ensure policies are updated and standards reviewed to reflect best practice.
- Make resources available to carry out all the above and to audit / review the policy on an annual basis or as legislation or working practices change.

REFUSAL TO WORK

The purpose of this Policy is to ensure that all employees are aware of the opportunity to stop working if they consider the working environment or the working practice to be unsafe. Responsibilities for health and safety have been clearly defined, allocated and accepted at all levels. All employees must play their part in implementing this policy if safety standards are to be maintained and improved. The Refusal to Work process is as follows:

- If an employee (individual) believes that a task or condition will endanger either themselves or others.
- Work should cease and the situation be immediately reported to the HSQE & Compliance Manager for Touch Point Media, along with informing the client as to the reasons works have ceased.
- The situation will then be reviewed by the person in charge of the works and the HSQE & Compliance Manager for Touch Point Media and consideration will be given to the safety impact on the individual and others.
- Where possible, immediate and appropriate action will then be taken to resolve the situation.
- As a result of the review, the system of work will either be confirmed as safe or amended
- If the individual is satisfied with this outcome, they will resume work.
- If the situation cannot be resolved, a review will be undertaken by the HSQE & Compliance Manager against all legislative standards and industry best practice to determine the safety impact of the task or condition. If the review fails to produce a satisfactory outcome, the disputed system of work will cease, and the customer will be informed as soon as practically possible.

The HSQE & Compliance Manager will liaise with the customer and consider the disputed working arrangements, making any necessary changes and advise the Directors/General Manager accordingly.

Changes to working arrangements will be documented, implemented and, where necessary, supported suitable training will be provided. Full details of the eventual, agreed outcome will be forwarded to all relevant parties including where appropriate the customer.

HUMAN RIGHTS

Touch Point Media strongly supports the principles of Human Rights and Rights at Work and as a result we will adhere to the following principles in respect of our staff, customers and supply chain.

- a. All employees, contractors and customers will be treated legally, fairly and honestly, regardless of where they work.
- b. Our Company will not employ or do business with organisations that employ illegal child labour, forced or bonded labour or condone illegal child labour.
- c. We will not use or condone the use of corporal punishment, mental or physical coercion, verbal abuse or discrimination.
- d. We will act swiftly to correct any situation where a member of staff or organisation we undertake business with fails to conduct themselves appropriately.
- e. We will abide by the non-discrimination laws in every country where we operate.
- f. Our Company will always pay a fair, legal wage reflecting local markets and conditions.
- g. Working hours and conditions will comply with industry guidelines and standards. Overtime will be voluntary and not excessive.
- h. We will discuss, negotiate and fairly agree with our employees all matters of working conditions and pay.
- i. We have formal grievance procedures through which staff can raise personal and work-related issues.
- j. All staff will be given access to bathroom and rest facilities.

HUMAN TRAFFICKING & MODERN SLAVERY

Touch Point Media strongly supports the principles of Human Rights, Human Trafficking & Modern Slavery legislation and as a result we will adhere to the following principles in respect of our staff, customers and supply chain.

- a. All employees, contractors and customers will be treated legally, fairly and honestly, regardless of where they work.
- b. Our Company will not employ or do business with organisations that employ illegal child labour, forced or bonded labour or condone illegal child labour.
- c. We will not use or condone the use of corporal punishment, mental or physical coercion, verbal abuse or discrimination.
- d. We will act swiftly to correct any situation where a member of staff or organisation, we do business with, fails to conduct themselves appropriately.
- e. We will abide by the non-discrimination laws in every country where we operate.

- f. Our Company will always pay a fair, legal wage reflecting local markets and conditions.
- g. Working hours and conditions will comply with industry guidelines and standards. Overtime will be voluntary and not excessive.
- h. We will discuss, negotiate and fairly agree with our employees all matters of working conditions and pay.
- i. We have formal grievance procedures through which staff can raise personal and work-related issues.
- j. All staff will be given reasonable access to bathroom and rest facilities.
- k. We recognize workers unions' rights, freedom of expression and freedom of association
- l. Supporting the development of collective negotiation and dialogue with employee representatives

ANTI-BRIBERY

It is the policy of our Company to ensure that it and its employees operate and conducts all business activities both legally and morally. As a consequence of this Company Policy we strongly prohibit the:

- Offering
- Giving
- Solicitation
- Acceptance of any bribe

This will include cash or other inducement to or from any person, company or body wherever they are situated in order to gain any form of commercial, contractual, regulatory or personal advantage.

This policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate and are properly recorded:

- Appropriate hospitality
- A ceremonial gift on a festival or at another special time
- The offer of related resources to assist and make the process more efficient provided that they are supplied for that purpose only.

It is the responsibility of all employees if in doubt as to whether a potential act constitutes bribery, to report the matter to a Senior Manager or either of the Joint Managing Directors.

EQUALITY AND DIVERSITY

Equal Opportunities

Touch Point Media is committed to promoting equal opportunities and values diversity, fairness and justice resulting in equality for everyone throughout the organisation enabling them to work free from discrimination, victimisation and harassment.

We will combat any form of discrimination and will use the Company's position of influence, wherever possible, to help overcome discriminatory barriers and actively promote good relations, conditions and procedures that result in a discrimination free environment.

This Policy will be extended, but is not restricted to race, gender and disability and is applied to the following processes as a minimum:

- Recruitment and Selection of all staff.
- Company Training.
- Promotion and career development.
- Human Resource Activities including Disciplinary and Dismissal activities.

This policy will extend to all aspects within the business and is firmly driven and implemented by the Managing Director and communicated throughout as an integral part of company training. A formal review of this Policy will be carried out as an integral part of annual Management Review and compliance by all personnel is mandatory for which failure to comply is a disciplinary offence.

DRUGS AND ALCOHOL

Purpose

The aim of this policy is to ensure the safety of all employees, workers, and visitors by having clear rules in place regarding use and possession of alcohol and drugs, and to support those who have reported a problem with alcohol or drug dependence.

For the purpose of the policy, alcohol dependence is defined as:

“The habitual drinking of intoxicating liquor by an employee, whereby the employee’s ability to perform his/her duties is impaired or his/her attendance at work is interfered with, or he/she endangers the safety of others”.

For the purpose of the policy, drug dependence is defined as:

“The habitual taking of drugs by an employee other than drugs prescribed as medication, whereby the employee’s ability to perform his/her duties is impaired, or his/her attendance at work is interfered with, or he/she endangers the safety of others”.

Principles

- All employees and workers will be treated consistently and fairly in line with this policy.
- The rules on alcohol and drugs will be strictly enforced.
- Those who admit to having a problem with alcohol or drugs shall be fully supported by their line manager and the company.
- Employees with an illness related to alcohol or drugs are encouraged to disclose this at the earliest opportunity to ensure support and help with treatment.
- All matters concerning alcohol and drugs shall be treated as confidential.
- This policy is designed to comply with relevant legislation such as the Health and Safety at Work Act 1974 and the Misuse of Drugs Act 1971

Scope

The Company’s alcohol and drugs policy applies to all employees. The rules laid out in this policy apply to all employees, workers and contractors.

- Misconduct in relation to alcohol and drugs will be dealt with in relation to the disciplinary Policy.
- Problems with attendance or a long-term alcohol/drugs related illness will be managed in line with the sickness absence policy.

Rules

The Company’s policy is that during working hours and at all times whilst on work premises employees must be free from the influence of drugs or alcohol. This will help to ensure the health and safety of employees and others with whom they come into contact, to maintain the efficient and effective operation of the business, and to ensure customers receive the service they require. For those reasons, the following rules will be strictly enforced.

No employee, worker or contractor shall –

- report or try to report for work when unfit* due to alcohol or drugs (whether illegal or not) or to substance abuse;
- be in possession of alcohol or illegal drugs** in the workplace;
- supply others with illegal drugs** in the workplace;
- supply others with alcohol in the workplace, except in the course of work duties.
- consume alcohol or illegal drugs or abuse any substance whilst at work.

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

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

In addition, employees, workers or contractors must –

- ensure they are aware of the side effects of any prescription drugs;
- Advise their line manager or a member of the management team immediately of any side effects of prescription drugs, which may affect work performance or the health and safety of themselves or others. For example, drowsiness.

Contravention of these rules is gross misconduct and the Company will take disciplinary action for any breach of these rules, which may include summary dismissal. In the case of agency workers or contractors, services may be terminated immediately upon a breach of these rules.

When there is reasonable belief that an individual is under the influence of alcohol or drugs on reporting for work or during the course of work, (for example if there was a strong smell of alcohol on the person's breath), they must be sent home immediately. A search may also be carried out in line with the Company's Staff Search policy.

In addition, possession of or dealing in illegal drugs on Company premises will, without exception, be reported to the Police.

Help and support:

The Company will endeavour to ensure that advice and help are made available to any employee who feels they have a problem with alcohol or drug misuse. In the first instance, individuals will be encouraged to seek help from their General Practitioner.

It may occasionally be necessary to request that the employee refrains from work temporarily or undertakes restricted duties to ensure their own safety and that of others. The Company may also allow additional time off (normally unpaid) for employees to obtain treatment or attend support groups.

Any employee who seeks the assistance of the Company in finding treatment for a drugs or alcohol problem has the Company's complete assurance of confidentiality.

RIGHT TO WORK

The company is obliged by law to check the eligibility of all our Temporary Workers that we employ and to ensure that they have documentation to confirm they are eligible to work legally in the UK.

Touch Point Media will follow Home Office guidelines to the checking of Temporary Workers right to work in the UK and ensure we abide by the Immigration Asylum and Nationality Act 2014.

When supplying a Temporary Worker to our clients we will ensure that all Temporary Workers have either: -

- Full UK Passport.
- Full long style UK Birth Certificate with supporting proof of National Insurance.

Proof of National Insurance can be provided via a P45, P60, previous pay slip, National Insurance Card, or letter from a Government Agency.

If the Temporary Worker is not a British Citizen, we ensure we request a copy of the individual's proof that they are eligible to work in the UK, this can be either: -

- Residence Permit
- Registration Card issued by the Home Office or a foreign Passport
- Document issued by the Home Office endorsing that the individual has a current right of residency in the UK.

Touch Point Media is committed to ensuring all our Temporary Workers are fully compliant, we ensure we take a copy of their right to work and keep a copy on our internal CMS system as well as a hard copy on file.

Touch Point Media will take every effort to abide by the Immigration Asylum and Nationality Act 2014 and ensure all Temporary Worker are compliant before engaging them with our clients.

When working with third parties, we regularly request spot audits to ensure they are working to the same standards that we do.

DATA PROTECTION POLICY

Touch Point Media is committed to a policy of protecting the rights and privacy of individuals, suppliers and customers in accordance with GDPR and The Data Protection Act 2018. The policy applies to all employees of Touch Point Media Ltd. Any breach of GDPR or The Data Protection Act 2018 or The Company Data Protection Policy is considered to be an offence, and, in that event, disciplinary procedures may apply.

As a matter of good practice all employees who have access to personal data will be expected to have read and comply with this policy. It is expected that any staff who deal with external organisations will take responsibility for ensuring that such organisations are made aware of this policy.

Legal Requirements

Data, both physical and electronic, is protected by GDPR and The Data Protection Act 2018. Its purpose is to protect the rights and privacy of individuals and to ensure that personal data is not processed without their knowledge, and, wherever possible, is not processed without their consent.

The Act requires us, Touch Point Media, to register the fact that we hold personal data and to acknowledge the right of 'subject access' – staff must have the right to copies of their own data if requested via a Subject Access Request (SAR).

Managing Data Protection

We will ensure that if applicable our details are registered with the Information Commissioner.

Data may be held by Touch Point Media for the following purposes:

1. Staff administration
2. Realising the objectives of Touch Point Media
3. Accounts, records & internal business analysis
4. Advertising, marketing & public relations
5. Information and database administration

Data Protection Principles

In terms of GDPR and The Data Protection Act 2018, Touch Point Media is the 'data controller', and as such determines the purpose for which, and the manner in which, any personal data is, or is to be, processed. We must ensure that we have:

1. Fairly and lawfully processed personal data

The company, where applicable and appropriate, will always put our logo on all paperwork, stating our intentions on processing the data and state if, and to whom, we intend to give the personal data. Also provide an indication of the duration the data will be kept.

2. Processed for limited purpose

We will not use data for a purpose other than those agreed by data subjects (staff and if applicable suppliers). If the data held by us is requested by external organisations for any reason, this will only be passed if data subjects (staff and suppliers) agree; the request will only be processed if in the form of a SAR.

3. Adequate, relevant and not excessive

Touch Point Media will monitor the data held for our purposes, ensuring we hold neither too much nor too little data in respect of the individuals about whom the data are held. If data given or obtained is deemed excessive by the nominated Information Security Officer, the data will be immediately deleted or destroyed.

4. Accurate and up to date

Staff are required to inform the Information Security Officer of any change in their personal circumstances that may affect the data we hold on such an individual. All amendments will be made immediately, and data no longer required will be deleted or destroyed. It is the responsibility of individuals and organisations to ensure the data held by us is accurate and up to date. Completion of an appropriate form (provided by us) will be taken as an indication that the data contained is accurate. Individuals should notify us of any changes, to enable personnel records to be updated accordingly. It is the responsibility of Touch Point Media to act upon notification of changes to data, amending them where relevant.

5. Not kept longer than necessary

We discourage the retention of data for longer than it is required. All personal data will be deleted or destroyed by us after one year of non-membership has elapsed.

6. Processed in accordance with the individual's rights

All individuals that Touch Point Media hold data on have the right to:

- a. Be informed upon the request of all the information held about them within 30 days.
- b. Prevent the processing of their data for the purpose of direct marketing.
- c. Compensation if they can show that they have been caused damage by any contravention of the Act.
- d. The removal and correction of any inaccurate data about them.

7. Secure

Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of data. All company computers including laptops have a login system and our Contact Database is password protected and held by 1 individual. Passwords on all computers are changed frequently. All personal and financial data is kept in a locked filing cabinet and can only be accessed by the Executive officers. When staff members are using the laptops out of the office, care should be taken to ensure that personal data on screen is not visible to strangers. All removable storage implements are to be kept in sight and not left unattended at any time. All staff are to be made aware of the transmission of electronic data via internal and external email systems, social media including Facebook and SMS.

8. Not transferred to countries outside the European Economic Area, unless the country has adequate protection for the individual

Data must not be transferred to countries outside the UK & European Economic Area without the explicit consent of the individual. Touch Point Media takes particular care to be aware of this when publishing information on the Internet, which can be accessed from anywhere in the globe. This is because transfer includes placing data on a web site that can be accessed from outside the UK & European Economic Area.



TOUCH POINT MEDIA

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