



## **Trendrevel Services**

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## **Anti-Slavery and Human Trafficking Policy**

### **Introduction**

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking. Trendrevel Services Limited has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015. The Company also expects the same high standards from all of its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery, and expects that its suppliers will in turn hold their own suppliers to the same standards.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment. In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. However, the Company accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

This Policy applies to all individuals working for the Company or on the Company's behalf in any capacity, including staff members, directors, officers, agency workers, volunteers, agents, contractors, consultants and business partners.

### **Responsibility for the Policy**

The Board of Directors has overall responsibility for ensuring that this Policy complies with the Company's legal and ethical obligations.

The Managing Director has day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness and auditing internal control systems and policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery. They are also responsible for investigating allegations of modern slavery in the Company's business or supply chains.

Department Heads are responsible for ensuring that those reporting to them understand and comply with this Policy.

## COMPLIANCE

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains, whether in the UK or abroad, is the responsibility of all those working for the Company or under the Company's control. You are required to avoid any activity that might lead to a breach of this Policy.

If you believe or suspect a breach of or conflict with this Policy has occurred or may occur, you must notify your Line Manager or report it in accordance with the Company's Whistle Blowing Policy. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible. If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, please raise it with your Department Head. You can also contact the government's Modern Slavery Helpline on 0800 0121 700 for further information and guidance on modern slavery.

The Company aims 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. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

The Company's zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

### **Breach of the Policy**

Any staff member who breaches this Policy will face disciplinary action, up to and including summary dismissal for Gross Misconduct.

The Company may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this Policy and/or are found to have been involved in modern slavery.



**John R Holt IEng MICE FGS**

For and on behalf of Trendrevel Services Limited  
Managing Director





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## Anti-Bribery and Corruption Policy

### Introduction

Trendrevel Services Limited has an established reputation for ethical behaviour and financial integrity and as such recognises that any involvement in bribery will reflect adversely on its' image and reputation.

The Company's aim is therefore to limit its exposure to bribery by employing the follow actions:

- Setting out a clear anti-bribery policy
- Training of all staff members so that they can recognise and avoid the use of bribery by themselves and others
- Encourage staff members to be vigilant and to report any suspicion of bribery, and as such provide them with suitable channels of communication as detailed within the Company's **Whistle Blowing Policy** together with ensuring that sensitive information is treated appropriately
- Rigorously investigate instances of alleged bribery and assist the police and other appropriate authorities in any resultant prosecution
- Ensure that firm and vigorous action is taken against any individual(s) involved in bribery not allowing any political contributions to be made by the Company

**Bribery is defined as:** *"the offering, promising, giving, receiving or soliciting of something of value for the purpose of influencing the action of any individual in the discharge of their duties."*

### The Policy

Trendrevel Services Limited prohibits:

The offering, the giving, the solicitation or the acceptance of any bribe whether cash or other inducement to or from:

- Any person or company, wherever they are situated and whether they are a public official or body or private person or company by:
- Any individual employee, agent or other person or body acting on the Company's behalf in order to :

- Gain any commercial, contractual or regulatory advantage for the Company in a way which is unethical or in order to:
- Gain any personal advantage, financial or otherwise for the individual or anyone connected with the individual.

The Company reiterates that this policy prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them and which is intended to influence them to take action which may not be solely in the interests of the Company or of the person or body employing them or whom they represent.

It is not the intention of this policy to prohibit the following practices providing they are customary within the industry, are proportionate and are properly recorded:

- Normal and appropriate hospitality
- The giving of a ceremonial gift
- The use of any recognised fast track process which is available to all on payment of a fee
- The offer of resources to assist the person or body to make the decision more efficiently provided that they are supplied for that purpose only
- Donations to charities will only be permitted with written authorisation from the Directors

Decisions as to what is acceptable may not always be easy. If any staff member is in doubt as to whether a potential act constitutes bribery the matter must always be referred to the managing Director or Company Secretary prior to any action being taken.

## **STAFF MEMBERS RESPONSIBILITY**

The prevention, detection and reporting of bribery is the responsibility of all staff members throughout the Company.

All reported instances of alleged bribery will be dealt with in the strictest confidence and if you prefer, and the law permits, you can report anonymously.

## **DISCIPLINARY ACTION**

Bribery is a criminal offence which may lead to criminal penalties. You have a duty to the Company and as such breaches of this policy will result in prompt disciplinary action up to and including dismissal.

## **LEGAL OBLIGATIONS**

The UK legislation on which this Policy is based is the Bribery Act 2010 and it applies to the Company's conduct both in the UK and abroad.

It is an offence in the UK to:

- Offer, promise or give a financial or other advantage to another person (i.e. bribe a person), whether within the UK or abroad, with the intention of inducing or rewarding improper conduct
- Request, agree to receive or accept a financial or other advantage (i.e. receive a bribe) for or in relation to improper conduct

- Bribe a foreign public official

You can be held personally liable for any such offence.

It is also an offence in the UK for a staff member or an associated person to bribe another person in the course of doing business intending either to obtain or retain business, or to obtain or retain an advantage in the conduct of business, for the Company.

The Company can be liable for this offence where it has failed to prevent such bribery by associated persons. As well as an unlimited fine, it could suffer substantial reputational damage.

## **STATEMENT OF COMMITMENT**

Trendrevel Services Limited will not tolerate any form of bribery or corruption.

This policy demonstrates the Company's zero-tolerance approach to bribery and corruption. The policy will be regularly reviewed and updated as and when necessary.



**John R Holt IEng MICE FGS**

For and on behalf of Trendrevel Services Limited  
Managing Director



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### **Environmental Policy**

Trendrevel Services Limited operates a policy to positively manage our environmental impact and to fulfil our compliance obligations.

The company is committed to the continual improvement of our environmental management system in order to improve our environmental performance.

This management system is implemented and maintained following the guidelines outlined in ISO 14001:2015.

Improvement in our environmental performance is achieved through the adoption of environmental objectives and improvement programmes, based on our significant environmental aspects, compliance obligations, environmental risks and opportunities.

The company is committed to the protection of the environment. In respect of the scope of our system, this includes the prevention of pollution, the use of sustainable resources, measures to mitigate the effect of climate change and the protection of biodiversity and ecosystems.

Our environmental policy is maintained as part our environmental management system, communicated throughout our organisation and made available to interested parties.

The Managing Director has ultimate responsibility for the implementation and application of our Environmental Policy, but we all have a responsibility to contribute to its success.

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Managing Director





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## **Equal Opportunities & Diversity Policy**

### **Introduction**

Trendrevel Services Limited operates an equal opportunities and diversity policy to ensure that employees, potential employees, clients, sub-contractors and anyone else we come into contact with, equally and with dignity and respect and not to discriminate on the grounds of sex, racial or ethnic origin, colour, nationality, disability, religious belief, age, employment status, occupation, marital status, sexual orientation or for any other reasons which cannot be shown to be justified.

### **Acts/Legislations**

This policy document complies with the following acts and legislations:

- Human Rights Act 1998
- Equality Act 2010 (Equality Bill)

### **Policy Statement**

Our policy is to promote equal opportunities and diversity in all aspects of our business. A

Accordingly we strive to:

- Honour the spirit and the letter of relevant employment and equality law and Codes of Practice.
- Make the only acceptable basis for decision-making in employment an objective assessment of merit and ability - whether in recruitment, promotion, training or any other aspect of employment. We will take positive steps to recruit more employees from under-represented groups and ensure that we have sufficient service delivery to ensure everyone is treated the same. As part of this service the Company supports the Local Government Act.
- Create a business environment which is free of all forms of harassment and bullying, where respect for the individual is paramount.
- Adopt innovative approaches to working arrangements which take account of the needs of our business and the employee.
- Ensure all our staff members understand their rights and obligations under our equal opportunities and diversity policy by an ongoing process of training and communication.

- Promote equal opportunities in other organisations with whom we deal by ensuring our tendering process and, as far as possible, our clients and suppliers actively promote equal opportunities policies. We will take appropriate, positive steps to employ more contractors from under-represented groups.
- Promote procedures which enable employees and clients who believe we have fallen short of our equal opportunity and diversity standards to raise concerns with us so that they can be quickly and effectively resolved.
- Check the progress of our policy statistically by regularly monitoring such matters as staffing levels, job applications, promotion, performance reviews.
- Both the Company and its employees may be legally liable for acts of unlawful discrimination in some circumstances. Aside from legal liability, disciplinary action, including dismissal, may be taken against employees for serious breaches of this policy.
- The Managing Director has ultimate responsibility for the implementation and application of our Equal Opportunities and Diversity Policy, but we all have a responsibility to contribute to its success.



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Managing Director





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## Whistle Blowing Policy

### Introduction

Trendrevel Services Limited encourages a free and open culture in dealings between its officers, staff members and all people with whom it engages in business and legal relations. In particular the Company recognises that effective and honest communication is essential if concerns about breaches or failures are to be effectively dealt with and the Company's success is ensured.

**The Public Interest Disclosure Act 1998** protects employees who raise legitimate concerns about specified matters from being dismissed by the Company or from being subjected to detrimental treatment or victimised by either the Company or work colleagues as a result, provided certain criteria are met. The Act makes provision about the kinds of disclosure which may be protected and the circumstances in which disclosures are protected. These rules are therefore intended to comply with the Act by encouraging staff members to make disclosures about fraud, misconduct, bribery or other wrongdoings to the Company, without fear of reprisal, in order that issues can be identified, dealt with and resolved quickly.

### The Policy

Trendrevel Services Limited's Policy is to support workers who raise protected disclosures. Staff members must not victimise, subject others to detrimental treatment or retaliate against staff member who has made a protected disclosure.

Staff members are protected provided they reveal information of the right type (known as a "qualifying disclosure") and they reveal that information to the right person and in the right way (known as making a "protected disclosure").

### Qualifying disclosures

Certain kinds of disclosure qualify for protection. These are disclosures of information which you reasonably believe are made in the public interest and tend to show one or more of the following relevant failures is either happening currently, took place in the past, or is likely to happen in the future:

- A criminal offence, e.g. fraud, acts of bribery
- A danger to the health and safety of any individual
- Damage to the environment
- A miscarriage of justice
- The Company is breaking the law, e.g. doesn't have the right insurance
- Deliberate concealment of information tending to show any of the above five matters

Only disclosures of information that fall within one or more of these six categories qualify for protection.

Your belief must be reasonable, but it need not be correct. It might be discovered subsequently that you were, in fact, wrong or mistaken in your belief, but you must be able to show that you held the belief and that it was a reasonable belief to hold given the circumstances at the time of disclosure. Note that it is not your responsibility to investigate the matter. That is the Company's responsibility.

You must also reasonably believe that your disclosure is made in the public interest. It will therefore not include disclosures which can properly be characterised as being of a personal rather than a wider public interest, for example a disclosure about a breach of the terms of your own contract of employment.

### **Protected disclosures**

For a qualifying disclosure to be a protected disclosure, you need to make it to the right person and in the right way. There are a number of methods by which you can make a protected disclosure, but the Company always encourages all staff members to raise any disclosure internally in the first instance.

You are protected if you make a qualifying disclosure to either:

- The Company, or
- You are encouraged to raise any qualifying disclosures that you may have by following the disclosure procedure set out below.

If your concern relates to a breach of your own contract of employment, you should use the Company's **Grievance Procedure** as outlined in the Company Handbook instead as these types of disclosure are not made in the public interest and are therefore not covered by this Policy.

### **The Disclosure Procedure**

This procedure applies to all permanent and temporary staff members. In addition, third parties such as agency workers, consultants and contractors and any others who perform functions in relation to Trendrevel Services Limited should use it.

#### **The procedure is as follows:**

1. If you wish to make a qualifying disclosure, you should, in the first instance, report the situation in writing to either the Managing Director or the Company Secretary, setting out in detail the nature of your disclosure.
2. Such disclosures should be made promptly so that investigation may proceed and any action taken promptly.
3. All qualifying disclosures will be treated seriously. The disclosure will be promptly investigated and, as part of the investigatory process, you will be interviewed and asked to provide a written witness statement setting out the nature and details of your qualifying disclosure and the basis for it. Confidentiality will be maintained during the investigation in so far as is practical and appropriate in the circumstances. However, in order to effectively investigate a disclosure, the Company must be able to determine the scope of the investigation and the individuals who should be informed of or interviewed about the disclosure.

The Company reserves the right to arrange for another Director, Officer or department Head to conduct the investigation other than the person with whom you raised the matter.

4. Once the investigation has been completed, you will be informed in writing of the outcome and the Company's conclusions and decision as soon as possible. The Company is committed to taking appropriate action with respect to all qualifying disclosures which are upheld.
5. You will not be penalised for raising a qualifying disclosure even if it is not upheld, unless the complaint was both untrue and made with malice.
6. Once the Company's conclusions have been finalised, any necessary action will be taken. This could include either reporting the matter to an appropriate external government department or regulatory agency and/or taking internal disciplinary action against relevant members of staff. If no action is to be taken, the reasons for this will be explained to you.
7. If, on conclusion of the above stages, you reasonably believe that appropriate action has not been taken, you may then report the matter externally to the proper authority in accordance with the provisions of the Act. The Act sets out a number of prescribed external bodies or persons to which qualifying disclosures may be made and you can access these on the government website [www.gov.uk](http://www.gov.uk). However, the Company always encourages all staff members to raise their concerns directly to the Company in the first instance, rather than externally. This enables issues to be dealt with promptly and speedily.

## **General Principles**

- Be aware of the importance of eliminating fraud, misconduct, bribery or other wrongdoing at work. Report anything that you become aware of that is illegal or unlawful
- You will not be victimised, subjected to a detriment or dismissed for raising a protected disclosure under this procedure
- Victimisation of a staff member, or subjecting them to any form of detrimental treatment or retaliation (including bullying and harassment), for raising a protected disclosure under this procedure will not be tolerated by the Company, is a disciplinary offence and will be dealt with under the Company's disciplinary procedure. Depending on the seriousness of the offence, it may amount to potential gross misconduct and could result in your summary dismissal
- Be aware that you can also be held personally liable for any act of victimisation or detrimental treatment of an employee or worker on the ground that they made a protected disclosure
- You should immediately draw the attention of the Managing Director or the Company Secretary, to suspected cases of victimisation or detrimental treatment related to either you or another staff member having made a protected disclosure



- Covering up someone else's wrongdoing is also a disciplinary offence. Never agree to remain silent about a wrongdoing, even if told to do so by a person in authority, such as your line manager
- Your right to make a protected disclosure under this procedure overrides any confidentiality provisions in your contract of employment
- Finally, maliciously making a false allegation is a disciplinary offence.



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Managing Director