

# Part A: General Health and Safety Policy

## General Statement

It is the policy of **CW DUKE & SONS LIMITED** to ensure, so far as is reasonably practicable, the health, safety and welfare of its employees and the health and safety of other persons who may be affected by its activities. The organisation will take steps to ensure that its statutory duties are met at all times.

## The Organisation's Responsibilities

The organisation will ensure that:

- all processes and systems of work are designed to take account of health and safety and are properly supervised at all times
- a member of senior management maintains specific responsibility for health and safety
- competent people are appointed to assist us in meeting our statutory duties including, where appropriate, specialists from outside of the organisation
- all employees are consulted on matters relating to health, safety and welfare
- adequate facilities and arrangements will be maintained to enable employees to raise issues of health and safety
- each employee will be given such information, instruction and training as is necessary to enable the safe performance of work activities
- all arrangements are brought to employees' attention and are monitored and reviewed to ensure that they are effective.

## Employees' Responsibilities

Employees must ensure that they:

- co-operate with management to enable all statutory duties to be complied with
- take reasonable care of their own health and safety and the health and safety of others who may be affected by their acts or omissions
- familiarise themselves with the health and safety arrangements that apply to them and their work functions.

Full details of the organisation and arrangements for health and safety will be set out in the remainder of this document.

Signed on behalf of **CW DUKE & SONS LIMITED**



**Steve Cameron**

**HEALTH & SAFETY DIRECTOR**

**Date: 05/01/2026**

## Summary / Background

Fraud is a crime and has no place at CW Duke. We do not tolerate fraud in any form whether directly or through third parties. Fraud can occur in many forms, understanding it and recognising when it might occur is a key step in guarding against that risk. Wherever we work we must be clear that we will not participate in or condone any form of fraud.

Fraud covers several areas but is essentially theft of company property by different means including by use of deception.

This theft can be explicit, such as stealing cash, taking tools, office stationery or scrap materials. However, it can also be implicit such as:

- Agreeing inappropriate variation orders thus reducing profit to CW Duke for personal gain.
- Receiving personal payments or benefits from suppliers or sub-contractors in return for preferential treatment.
- Theft of data, whether developed by someone in company time or proprietary data.
- Misuse of company credit, procurement or fuel cards.
- Completing inaccurate or false expense claims or timesheets.

Attempted thefts or frauds are treated in the same way as actual thefts and fraud and fall under this policy. In addition, unexplained financial irregularities, particularly those in excess of £5K or anywhere misconduct is a possible cause, also fall under this policy and need to be escalated accordingly.

## What is the requirement?

All CW Duke employees are required to comply with the Economic Crime and Corporate Transparency Act 2023 and uphold CW Duke values and standards. All employees are required to follow this policy, and the systems and controls that are designed to ensure that instances of fraud do not take place in our business. Where any behaviours fall short of our expectations or where you have a concern, you must report those concerns to the Directors.

## Why is it important?

The penalties for engaging in fraud can be severe. Parties involved can be fined and/or imprisoned.

A conviction for fraud related offence for a company such as CW Duke could have severe consequences for us including prosecution, possible exclusion from tender lists, or being excluded when bidding, loss of business, or a decrease in supporter confidence, all of which could have severe financial consequences for our business.

A breach of this policy could also be a violation of local laws and therefore result in civil and criminal penalties for all concerned.

### What must I do/not do?

Our 'zero tolerance' of fraud relies on every person at CW Duke and our associated persons always choosing to do the right thing. This requires a few simple commitments:

#### We will:

- Comply with this Anti-fraud Policy and any related procedures or standards.
- Comply with our requirements concerning any conflicts of interest.
- Record all activities and transactions accurately, completely, and transparently.
- Seek advice if unsure how to proceed.
- Report any suspected or actual breaches of this policy promptly and accurately to the relevant CW Duke line managers or Directors.
- Maintain effective controls to prevent fraud and to aid prompt detection.
- Clearly defined operating guidelines and procedures including.
- Segregation of duties.
- Robust procurement procedures.
- Appropriate levels of authorisation and approval.
- Objective tender assessment.
- Assignment of tasks to specific roles/individuals.
- Clear communication of responsibilities.
- Physical and system access controls.
- Self-examination and self-certification of internal controls
- Procedures and guidance issued with regard to the screening of new employees.

#### We will not:

- Commit a fraud.
- Participate in any form of corrupt behaviour.
- Use company funds, whether in the form of payments or gifts and hospitality or otherwise, for any unlawful, unethical or improper purpose.
- Offer or accept gifts or hospitality, if we think this might impair objective judgement, improperly influence a decision or create a sense of obligation, or if there's a risk it could be misconstrued or misinterpreted by others.

The policy was approved on **2<sup>nd</sup> January 2026** following consultation with senior managers, workers and workers' representatives.

For more information, please contact:

Mr Steve Cameron (Director)

CW Duke & Sons Ltd, 53 Newfoundland Circus, Bristol, BS2 9AP



Steve Cameron  
Director



J Porter  
Director

# Anti-Bribery and Corruption Policy

## Introduction

CW Duke is committed to delivering services and carrying out its business operations in an ethical, open and transparent manner. We have always worked hard to build a longstanding and unquestionable reputation for our positive behaviour and integrity. This reputation is based on our zero tolerance approach to any questionable behaviour which may place in doubt the company's values and conduct.

As well as the conduct of our own employees, this policy is also applicable to third parties that provide works and services on our behalf such as: customers and their employees and subcontract and supply chain partners. We expect those parties to adhere to, or provide, equivalent policies and procedures in relation to tackling issues of bribery and corruption within the workplace.

## The Policy

CW Duke does not tolerate any form of bribery or corruption. No person who comes under the scope of the policy must offer, to pay, make, seek or accept a personal payment, gift or favour in return for favourable treatment or to gain any business advantage. It is a criminal offence to do so.

All business activities undertaken by the Company must adhere to, and comply with, any government legislation set out (The UK Anti Bribery Act 2010). All subsequent revisions of legislation must be complied with. The Company will take disciplinary action against employees and will disassociate itself from parties or individuals it believes to have been behaving in a manner which could contradict this policy.

Any breach of the Policy by employees will result in disciplinary action under the Gross Misconduct provisions of the company's Disciplinary and Dismissal Procedures which can include the sanction of summary dismissal in any case where an employee has been found to have paid or received a bribe.

The guideline below sets out the company's clear and unequivocal stance with regard to bribery and the acceptance of gifts from colleagues, clients or third parties.

Employees and representatives of the company shall not:

- Offer, promise or pay bribes
- Request, agree to or accept bribes
- Make payments to someone (or favour them in any other way) if they know that it will involve someone in misuse of their position (or them performing their functions improperly)
- Misuse their position (or perform your functions improperly) in connection with payments (or other favours) for themselves or others
- Deliberately use advantages to try to influence public officials for business reasons

Further guidance may be obtained by referring to the UK Anti Bribery Act 2010.

## Policy Procedures

### Communication

We will communicate this policy and relevant guidance to employees throughout the company, through our established internal communication channels. We will also communicate this policy to our suppliers, contractors and business partners and wider stakeholders.

### Training

We will ensure that those within the scope of the policy receive training appropriate to their activities and the associated risks.

### Data Retention

We will maintain adequate books and records that properly and fairly document all financial transactions. We will maintain written evidence to record compliance with this policy.

### Business Relationships

It is our intention that our business partners – including contractors, suppliers, agents, brokers and joint venture partners – are fit to do business with.

### Supply Chain

We will address bribery and corruption risk in our supply chain, for example by ensuring that payments made for goods and services are reasonable.

### Conflicts of Interest

We will address conflicts of interest and the risks created by gifts and hospitality through the implementation of our internal policies.

### Whistle Blowing

Understandably, employees may be worried about raising these types of issues and may consider keeping these concerns to themselves. If an employee raises a genuine concern under this policy, we will ensure that they will not be at risk of losing their job or suffering any form of retribution as a result.

We understand employees may wish to raise a concern in confidence, if we are asked to protect the person's identity we will not disclose their identity without prior consent.

### Raising a Concern Internally

If an employee has a concern we hope they would normally be able to raise this with their line manager either verbally or in writing. If they feel they cannot raise the concern with their line manager or if it appears nothing is being done with regard to their concern they should contact the Managing Director.

All concerns will be investigated and reviewed. This will involve a formal investigation following a formal procedure with an official, written outcome.

### Raising a Concern Externally

We would hope that the policy gives employees the assurance needed to raise matters internally however there may be circumstances when they may need advice or assistance prior to reporting any issues externally (i.e. regulators or Police).

Public Concern at Work (PCAW) are a free, confidential and practical helpline that provide practical advice if an employee is unsure of whether or how to raise a concern about danger or illegality that they have witnessed at work.

- Helpline Number: 020 3117 2520
- [helpline@pcaw.co.uk](mailto:helpline@pcaw.co.uk)

### Monitoring and Review

The Company is responsible for engaging Internal Audit to independently assess compliance with this policy.

An annual audit will be carried out annually on compliance with this policy to the Senior Management Teams, which will make an independent assessment of the adequacy of the policy and disclose any material non-compliance. The Company may also make an independent assessment of the adequacy of the policy in response to an event such as an instance of bribery.

This policy has been endorsed by Mr Steve Cameron (Director), and has the full support of the management / board.

The policy was approved on **2<sup>nd</sup> January 2026** following consultation with senior managers, workers, workers' representatives, and trade unions.

Overall responsibility for the effectiveness of the policy lies with Mr Steve Cameron.

For more information, please contact:

Mr Steve Cameron  
Director  
CW Duke and Sons LTD,  
53 Newfoundland Circus,  
Bristol  
BS2 9AP



S Cameron  
Director



J Porter  
Director

# Conflicts of Interest Policy

## **Summary / Background**

CW Duke expects all employees to act with the highest ethical standards of conduct. Business activities or business relationships that create or appear to create a conflict between the business interests of CW Duke and those of an employee must be managed appropriately. A conflict of interest is a set of circumstances that creates a risk that an individual's ability to apply judgement is, or could be, impaired or influenced by a secondary interest. Those interests may compete or differ from those of CW Duke, but in some cases, they may also align. Conflicts of interest include both those situations where an actual conflict of interest occurs or could occur, and those that could give rise to a perception of a conflict of interest. This policy sets out CW Duke arrangements to deal with any actual or potential conflicts of interest. This both upholds CW Duke integrity and protects employees from the negative impact that an undisclosed conflict of interest can have.

## **What is the requirement?**

All employees of CW Duke (including temporary staff) must disclose any potential conflicts of interest to their line manager).

## **Why is it important?**

It is important to manage any actual or potential conflicts of interest to maintain confidence in the business decisions we make. Any conflict of interest that is not managed appropriately could impair the decision-making process and potentially result in an outcome that is sub-optimal for CW Duke, and from a personal perspective, undermine confidence and trust. Such loss of confidence and trust could occur even where an employee and CW Duke's interests are aligned, but where a conflict hasn't been disclosed. It is important for your own protection to disclose an actual, potential, or perceived conflict of interest.

CW Duke is committed to providing a working environment that upholds our values. All employees are required to support our values in the way that we operate.

We rely on every person at CW Duke to do the right thing. This requires a few simple commitments.

## **Senior management:**

Members of senior management are required to promote a culture where employees are encouraged to report any actual or potential conflicts of interest whether it relates to their own circumstances or where an employee may have identified a potential conflict of interest relating to another employee.

## **All employees:**

Employees are responsible for identifying potential conflicts of interest on an ongoing basis. Employees must:

- Immediately disclose actual or potential conflicts of interest and in any case before such conflicts of interest impact any activities at CW Duke. Conflicts must be disclosed through line management or director level.

- Avoid situations that may give rise to actual or potential conflicts of interest.
- Withdraw from a situation that may give rise to or trigger a conflict of interest until that has been resolved.
- Comply with any controls imposed relating to a disclosed conflict of interest.
- Continue to monitor any actual or potential conflicts of interest and update the Management.

The policy was approved on **2<sup>nd</sup> January 2026** following consultation with senior managers, workers and workers' representatives.

For more information, please contact:

Mr Steve Cameron (Director)

CW Duke & Sons Ltd, 53 Newfoundland Circus, Bristol, BS2 9AP

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Steve Cameron  
Director

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J Porter  
Director



## Corporate Social Responsibility Policy

CW Duke carry out our business with integrity, aspiring to the highest standards of health and safety and managing our environmental impacts. We believe that through positively influencing our stakeholders and surrounding environment, we will be able to deliver sustainable construction whilst recognising our corporate responsibilities.

We are a small but important part of the local and regional economy and understand our responsibilities to the smaller tertiary employers that form part of our supply chain. From the ethical way we manage our supplier relationships to the sourcing of sustainable timber we aim to ensure that our practices leave our customers feeling satisfied with our approach to business. We work closely with our customers, designers and the local community to protect the environment by reducing carbon dioxide, preventing pollution, reducing energy used and water requirements. Our purchasing decisions wherever possible are environmentally focused for recyclable products and sustainable materials.

### Stakeholders:

- **Employees**  
We aim to create a working environment that is safe for all our employees and stakeholders. Our planning and procurement always make the safe completion of works the most important consideration. We aim to foster an environment where our people feel empowered to make decisions on the basis of health and safety, the quality of these decisions is directly related to competence and the level of training provided.
- **Equality and Diversity**  
CW Duke is committed to building an organisation that makes full use of the talents, skills, experience, and different cultural perspectives available in a multi-ethnic and diverse society, and where people feel they are respected and valued, and can achieve their potential regardless of race, colour, nationality, national or ethnic origins, sexual orientation, gender, disability or age. We strictly adhere to our Equal Opportunities Policy at all times.
- **Training**  
CW Duke invest heavily in training and employee development. We believe in giving back to local communities by employing where possible a number of apprentices every year from local schools, we also take on work experience students and placement students from local universities. We encourage up-skilling and have provided a significant number of our employees with additional training and education at college or university.
- **Health, Safety & Wellbeing**  
Health and Safety is a main priority for CW Duke, we have an excellent safety record with an extremely low incident rate due to the quality and level of H&S training provided, the openness of management and the thoroughness of our planning. We are committed to maintaining and improving upon these high standards to ensure that all employees, subcontractors and those affected by our works remain safe at all times.

- Clients

CW Duke will work in partnership with our clients to deliver quality products on time with a due regard for safety and our environment. We will work with clients to develop sustainable practices to meet requirements and will endeavour to beat any environmental targets set to us by our clients. Our aim is to exceed expectations and forge long-term, trusting relationships with our clients.

- Community

CW Duke aim to build excellent community relations on every site, with minimum disruption to local people and businesses. We endeavour to be a positive influence on the community and to give back where possible. We subscribe to the Considerate Constructors Scheme and register a number of our sites with the scheme.

- Suppliers

CW Duke have a long-established integrated supply chain built upon years of trading with other local companies. The supply chain encourages best practice, a safe working environment and we aspire to improve upon environmental practices at all levels within the chain.

- Environmental

We are fully committed to achieving the goals of our Environmental Policy and comply with government legislation at all times. We consistently seek to find alternative, eco-friendly solutions in all areas of our business. We divert a large majority of our waste from landfill, where possible we re-use materials to minimise and curtail creating waste. Whenever practicable we use materials and products from sustainable sources and we reduce carbon dioxide emissions wherever we can.

This policy has been endorsed by Mr Steve Cameron (Director), and has the full support of the management / board. The policy was approved on **2<sup>nd</sup> January 2026** following consultation with senior managers, workers, workers' representatives, and trade unions.

Overall responsibility for the effectiveness of the policy lies with Mr Steve Cameron.

For more information, please contact:

Mr Steve Cameron  
Director  
CW Duke and Sons Ltd  
53 Newfoundland Circus,  
Bristol  
BS2 9AP

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S Cameron  
Director

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J Porter  
Director

## Data Protection Policy

CW Duke work at all times with integrity, aspiring to the highest standards at all times. The business adheres to the Data Protection Act 1998 activities and strictly complies with all legislation and regulations.

Any information CW Duke gather is:

- Processed fairly and lawfully
- With permission to do so or sought with permission granted
- Obtained & used only for specified and lawful purposes
- Adequate, relevant and not excessive
- Accurate, and where necessary, kept up to date
- Kept for no longer than necessary
- Processed in accordance with the individuals rights (as defined)
- Kept secure at all times

Any data viewed by CW Duke employees that is not in the public domain will be treated as confidential and stored securely at all times.

Any information given to CW Duke by clients that is of a sensitive nature is also treated as confidential and stored securely at all times. The company has registered with the Information Commissioners Office (ICO) to demonstrate the company's compliance with the Data Protection Act.

Marketing; CW Duke will only market to our clients and contacts under the clause 'legitimate interest'. We will contact individuals with relevant and required information only. We are not a 'hard sell' business. We will seek the permission to do this, we will not rely on implied consent, inactivity, silence or unticked boxes.

Should we receive a request to withdraw client, or contact information we will delete the record entirely not archive, within 24 hours of receiving the request. We will inform all parties involved that the request has been received and the action taken. We are aware that every individual has 'the right to be forgotten'.

CW Duke hold limited data about their staff, in order to carry out their normal administration. This means they collect and store the data for any purposes connected to their work. To comply with statutory and government requirements CW Duke occasionally must provide relevant data (which may include contact details) to other organisations such as Council Tax Registration Officers, the Student Loans Company and the Child Support Agency or to agents acting on their behalf).

When members of staff commence their employment with CW Duke, CW Duke ask them to give details for an Emergency Contact. This data will be used or disclosed only in case of emergency. The employee must ensure that the contact is notified of the disclosure of their details to the business.

This policy has been endorsed by Mr Steve Cameron (Director), and has the full support of the management / board.

The policy was approved on **2<sup>nd</sup> January 2026** following consultation with senior managers, workers, workers' representatives, and trade unions.

Overall responsibility for the effectiveness of the policy lies with Mr Steve Cameron. Amanda Gale is the lead on storing and processing of data.

For more information, please contact:

Mr Steve Cameron  
Director  
CW Duke and Sons Ltd  
53 Newfoundland Circus,  
Bristol  
BS2 9AP

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S Cameron  
Director

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J Porter  
Director

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# GDPR Policy

## 1. Introduction

CW Duke is committed to protecting the privacy and data rights of our employees, clients, and supply chain partners. This policy outlines our commitment to complying with the United Kingdom General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

## 2. Scope

This policy applies to all personal data processed by CW Duke in the course of our business operations. It covers employees' data, client data, and data related to our supply chain partners.

## 3. Data Protection Principles

CW Duke adheres to the following data protection principles:

3.1. Lawfulness, Fairness, and Transparency: We process personal data lawfully, fairly, and transparently, ensuring data subjects understand how their data is used.

3.2. Purpose Limitation: We collect and process data only for specific, legitimate purposes and do not use it for incompatible purposes.

3.3. Data Minimization: We only collect data that is necessary for the intended purpose and ensure it is accurate and up to date.

3.4. Storage Limitation: We retain personal data for no longer than necessary for the purposes for which it is processed.

3.5. Integrity and Confidentiality: We implement appropriate security measures to protect personal data against unauthorised access, disclosure, alteration, or destruction.

## 4. Data Processing

4.1. Consent: Where required, we obtain clear and explicit consent from data subjects before processing their personal data.

4.2. Legitimate Interests: We process personal data based on legitimate interests, ensuring that the rights and freedoms of data subjects are not compromised.

4.3. Data Access: Data subjects have the right to access their personal data held by CW Duke and request corrections or deletions when necessary.

4.4. Data Portability: Upon request, we provide data subjects with a copy of their data in a structured, commonly used, and machine-readable format.

## **5. Data Security**

5.1. CW Duke maintains appropriate technical and organisational measures to protect personal data against data breaches, including encryption, access controls, and regular security assessments.

## **6. Data Sharing**

6.1. We may share personal data with trusted third parties, such as service providers and supply chain partners, only when necessary and with appropriate data processing agreements in place.

## **7. Data Breach Reporting**

7.1. In the event of a data breach, CW Duke will promptly report the breach to the Information Commissioner's Office (ICO) and affected data subjects, as required by law.

## **8. Data Protection Officer**

8.1. CW Duke has appointed a Data Protection Officer (DPO) responsible for overseeing data protection activities and ensuring compliance with the UK GDPR.

## **9. Training and Awareness**

9.1. We provide regular data protection training to our employees to ensure they understand their responsibilities in protecting personal data.

## **10. Compliance Monitoring**

10.1. We regularly review and update this policy to ensure ongoing compliance with the UK GDPR.

## **11. Contact Information**

For any questions or concerns regarding this policy or the processing of personal data, please contact our Data Protection Officer at [stevecameron@cwduke.co.uk](mailto:stevecameron@cwduke.co.uk)

By implementing and adhering to this GDPR policy, CW Duke aims to protect the privacy and data rights of all individuals associated with our business operations. We are committed to continuous improvement in our data protection practices ensuring full compliance with UK GDPR and related regulations.

For more information, please contact:

Mr Steve Cameron, Director, CW Duke, 53 Newfoundland Circus, BA2 9AP  
BS2 9AP

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S Cameron  
Director  
2<sup>nd</sup> January 2026

## Environmental Policy and Green Code of Conduct

CW Duke recognise that our activities have an impact on the environment. We are committed to improving our environmental performance wherever possible, minimising the harmful effects through caring policies and effective management.

We accept and acknowledge our obligations and responsibilities under legislation and guidance dealing with environmental issues that affect or arise in consequence of our business.

In overall recognition of our commitment we have achieved a ISO: 14001 accreditation.

We will continuously identify and determine environmental issues requiring attention and will implement measures to achieve continuous improvement. In particular, we will:

- Establish sound environmental awareness through the implementation of our existing Quality System and training all our staff on company policies, objectives and targets as appropriate.
- Encourage environmental awareness, responsibilities and understanding of our aims amongst suppliers and sub-contractors, providing training as necessary and encouraging them to adopt sound environmental practices and make it part of the way we do business together.
- Ensure that staff consider all environmental aspects and potential impacts of their work and ensure the availability of a platform for discussion and suggestion of environmental concerns and initiatives
- Promote waste minimization by recycling and /or finding other uses for redundant and waste product whenever economically viable and environmentally sound to do so.
- Promote the use of materials and products from sustainable sources.
- Meet all relevant legislative, regulatory and environmental codes of practice
- Foster the commitment of all management and staff to continually improving the environmental performance of the company and in their domestic activities
- Develop objectives that target environmental improvements and monitor performance by regular review, consider environmental issues within the organisations strategic decision making process
- Control the emission of pollutants, noise and dust, and the use of potentially harmful substances and treatments during construction activities in line with regulatory obligations.
- Conserve energy through sensible selection, use and management of resources, equipment, plant and transport.
- Cooperate with the communities in which we operate, government, regulatory bodies and interested parties with the shared vision of being a good and trusted neighbour

The requirements of this policy will be achieved by continually monitoring practices and carrying out regular management reviews.

This policy has been endorsed by Mr Steve Cameron (Director) who has overall responsibility for the effectiveness of it. It has the full support of the management / board.

The policy was approved on **2<sup>nd</sup> January 2026** following consultation with senior managers, workers and workers' representatives.

For more information, please contact:

Mr Steve Cameron  
Director  
CW Duke and Sons Ltd  
53 Newfoundland Circus,  
Bristol  
BS2 9AP

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S Cameron  
Director

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J Porter  
Director



# Equal Opportunities and Diversity Policy

## General Statement of Policy

C W Duke & Sons Ltd. is committed to eliminating discrimination and encouraging diversity so that each employee feels respected and able to give all of their best.

The company acknowledges and promotes the differences between individuals and values a diverse contribution of skills, abilities and experience.

To that end the purpose of this policy is to provide equality and fairness for all in our employment and business operations, and not to discriminate on grounds of gender, marital status, race, ethnic origin, colour, nationality, national origin, disability, sexual orientation, religion or age.

We oppose all forms of unlawful and unfair discrimination.

It is Company policy that all members of the public, business partners, and staff, whether part-time, full-time or temporary, are treated fairly and with respect.

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.

The Directors will:

- Create an environment in which individual differences and the contributions of all our staff are recognised and valued.
- Provide employees with a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated and be dealt with as a serious matter under our disciplinary procedures. Employees are encouraged to report any such incident to Management.
- Make training, development and progression opportunities available to all staff.
- Recognise that equality in all aspects of CWD's activity is good management.
- Practice and makes sound business sense.
- Review all our employment practices and operational procedures to ensure fairness.
- Ensure that the Company observes as far as possible all relevant codes of practice and complies with its obligations under current regulations and legislation.

**Breaches of our equality policy will be regarded as misconduct and could lead to disciplinary proceedings.**

This policy has been endorsed by Mr Steve Cameron (Director) who has overall responsibility for the effectiveness of it. It has the full support of the management / board.

The policy was approved on **2<sup>nd</sup> January 2026** following consultation with senior managers, workers and workers' representatives.

For more information, please contact:

Mr Steve Cameron  
Director  
CW Duke and Sons Ltd  
53 Newfoundland Circus,  
Bristol  
BS2 9AP

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S Cameron  
Director

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J Porter  
Director

## Humans Rights Policy

This global Human Rights Policy applies to all CW Duke employees, those doing business with, or for, CW Duke and others who may act on CW Duke's behalf. This policy applies to all CW Duke office and site locations and wherever CW Duke business is conducted.

### **CW Duke commitments**

CW Duke is committed to human rights in the workplace. This commitment includes respecting the dignity and worth of all employees, encouraging all employees to reach their full potential and providing equal opportunities to all employees. CW Duke is an equal opportunity employer and recruits, hires, trains, promotes, compensates and administers all personnel actions without regard to any legally protected status. In addition, CW Duke:

Recognises its responsibilities with regards to workplace health and safety, employee privacy and freedom of association;

Prohibits the use of forced labour and child labour;

Does not tolerate any form of harassment or discrimination; and

Works to ensure compliance with applicable labour and employment laws, including those regulating wages and hours.

CW Duke respects international human rights principles. We are committed to the principles outlined in the United Nations Global Compact and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

CW Duke is also committed to a diverse workplace. Our teams are composed of individuals from different geographies, cultures, ethnicities, religions, races, genders, sexual orientations, abilities, and generations. We are committed to fostering diversity, inclusion, and engagement across all aspects of our business. We are also committed to integrity and operating at the highest ethical standards.

### **Our shared responsibility**

All employees are responsible for ensuring compliance with this policy. Employees are encouraged to raise any concerns with their manager, Human Resources or the office of the Ombuds.

### **Employment**

CW Duke as part of its employment process will vet the status of employment for all potential employees, UK Nationals will have to provide evidence by way of official documentation presentation (e.g. an 'in-date' British Passport). Non-UK nationals will have their employment status & documents verified by using the [www.gov.uk/legal-right-to-work-in-the-uk](http://www.gov.uk/legal-right-to-work-in-the-uk). And/or by obtaining a 'share code' provided by the potential employee to verify their status. All records of checks will be kept securely in accordance with The Data Protection Act 2018.

CW Duke will investigate any alleged violations of this policy and take appropriate corrective action, as necessary. Furthermore, we will regularly monitor our human rights commitments to ensure that we are continuously promoting human rights within the communities in which we operate.

The policy was approved on **2<sup>nd</sup> January 2026** following consultation with senior managers, workers and workers' representatives.

For more information, please contact:

Mr Steve Cameron (Director)

CW Duke & Sons Ltd, 53 Newfoundland Circus, Bristol, BS2 9AP

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Steve Cameron  
Director

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J Porter  
Director

## Sustainable Procurement & Materials Policy

CW Duke work at all times with integrity, aspiring to the highest standards of health and safety and managing our environmental impacts wherever we can. We believe that through positively influencing our stakeholders and surrounding environment, we will be able to deliver sustainable construction whilst recognising our corporate responsibilities.

This policy supports our Environmental Policy and sets a framework for our materials procurement. We are committed to responsibly choosing materials and components using sustainable and environmentally friendly choices sources where practicable. We will reduce waste and consumption of energy and raw materials and maximise opportunities to re-use and recycle wherever possible.

We will accomplish this by:

- Complying with all applicable environmental and health and safety legislation.
- Procuring materials from local, sustainably-managed renewable sources that can be composted (or fed to livestock) when their usefulness has been exhausted.
- Endeavouring to use less material, fewer materials (making it easier to recycle) and if possible avoiding toxic substances and choosing renewable or recycled/recyclable.
- Reducing waste levels and actively recycling waste materials for re use.
- Carefully monitoring scrap materials in accordance with our quality procedures.
- Making sure energy use is monitored through a programme of improvement to ensure maximum efficiency.
- Not using any timber from species prohibited under CITES or from illegal sources. Procuring timber from verified legal sources. Products should be certified under Forest Stewardship Council (FSC) or the Programme for the Endorsement of Forest Certification (PEFC) Schemes. Both schemes are approved for the purposes of both 'Legal Timber' and 'Sustainable Timber'.
- Suppliers and subcontractors shall, as far as is reasonably practicable, minimise the concentrations of heavy metals and brominated fire retardants in products and packaging being supplied as well as keep details on the substances and materials associated with products and services supplied.
- Encouraging the use of materials with recycled content as well as supporting the use of products that are designed with minimal packaging and which can either be reused or recycled. Suppliers and subcontractors shall maximise the use of recycled content in products and packaging.
- Aiming to deliver zero waste projects where no waste is sent directly to landfill. Where practicable, all products will be able to be reused, recycled or recovered. Suppliers and subcontractors shall where required contribute to the development and compliance with any Site Waste Management Plan (SWMP).
- Minimising the use of primary, secondary and tertiary packaging, and where this is unavoidable, ensuring it is made from materials that can be reused, recycled, or recovered by commonly available methods in the UK.

This policy has been endorsed by Mr Steve Cameron (Director), and has the full support of the management / board.

The policy was approved on **2<sup>nd</sup> January 2026** following consultation with senior managers, workers, workers' representatives, and trade unions.

Overall responsibility for the effectiveness of the policy lies with Mr Steve Cameron.

For more information, please contact:

Mr Steve Cameron  
Director  
CW Duke & Sons Ltd,  
53 Newfoundland Circus,  
Bristol  
BS2 9AP

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S Cameron  
Director

A handwritten signature in black ink, appearing to read 'J Porter'.

J Porter  
Director

# Building Safety Act Policy Statement

## **Introduction-**

CW Duke is committed to the general principles of improving building safety, following the introduction of the Building Safety Act 2022 and its full implementation in October 2023, we acknowledge our responsibility and our duty as a Principal Contractor. As a competent contractor we understand the impact of our actions and also the limitations of our expertise and when to utilise the support of others to ensure that any building works carried out meets the requirements of regulations.

This policy statement outlines the standards that we will remain committed to in association with the Building Safety Act in addition to other legislation and regulation governing the work we undertake.

## **Scope-**

This policy applies to all activities undertaken by the company in our role as Principal Contractor, as defined. It covers the activities and that of contractors under our supervision.

## **Commitment-**

CW Duke are committed to the following principles in respect of all building work:

- To plan, manage and monitor the building work and understand the requirements of building regulations and other relevant legislation.
- To cooperate, communicate and coordinate our work with other duty holders.
- To liaise and, where necessary, work with all stakeholders who impact on the design, construction planning, construction and handover phases on matters affecting the lifetime safety and related quality assurance of the building work.
- To plan and coordinate the building work to allow time for delivery of a technically compliant and safe building, including the surrounding environment for the occupants.
- To use reliable and nationally recognized sources of industry information and standards in decision-making.
- To professionally lead and develop the competences of those under our control and provide encouragement and clear, proportionate guidance to the supply chain
- To recognise the limit of our own competences and of those under our control.
- To determine when to engage with experts holding such specialist skills, knowledge, experience and behaviours and to assist them in demonstrating their compliance.

- Manage project budgets without compromising the safety of people in and around the building.
- To procure appropriately quality assured materials, products and building systems that are suitable for their intended purpose and remain safe for their anticipated lifetime.
- To manage and maintain all relevant information relating to the building, including records of work, inspections and tests to demonstrate compliance in accordance with appropriate codes of practice and guidelines
- To manage the flow of information derived from the design and construction processes and maintain its passage to the Client or other duty holders and the Licensed Accountable Person.

This policy has been endorsed by Mr Steve Cameron (Director), and has the full support of the management / board. The policy was approved on **2<sup>nd</sup> January 2026** following consultation with senior managers, workers, workers' representatives, and trade unions.

Overall responsibility for the effectiveness of the policy lies with Mr Steve Cameron.

For more information, please contact:

Mr Steve Cameron  
Director  
CW Duke,  
53 Newfoundland Circus,  
Bristol  
BS2 9AP

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S Cameron  
Director

A handwritten signature in black ink, appearing to read 'J Porter'.

J Porter  
Managing Director



# Construction Products Regulations (CE Marking) Statement

The government made legislation in March 2019 which came into effect on 1 January 2021 to make arrangements for the regulation of construction products after EU Exit.

All existing harmonised European standards became UK 'designated standards'. This means that immediately after the end of the transition period, harmonised European standards and UK designated standards will be identical.

Under the terms of the Withdrawal Agreement, goods lawfully marked with the CE mark and placed on the EU market before the end of the transition period can continue to circulate until they reach their end user, whether they are in the UK or the EU. This includes requirements that they:

- are covered by a harmonised European standard, which is the same as a UK designated standard (as noted above)
- are affixed with CE marking
- are accompanied by a manufacturer's declaration of performance
- have been assessed by an EU-recognised notified body, where third party assessment is required.

From 1 January 2021, UK notified bodies operating under the EU Construction Products Regulation 2011 (EU Regulation No. 305/2011) and based in the UK were granted new UK 'approved body' status and listed in a new UK database (the [UK Market Conformity Assessment Bodies database](#)). Notified bodies established in the UK were contacted in December 2020 with further details on their approved body status.

To ensure CW Duke are compliant with these new regulations we ensure all products used, inclusive of PPE, are included in this database and / or possess the appropriate markings as laid out by the government guidance.

This statement was approved on **2<sup>nd</sup> January 2026** following consultation with senior managers.

For more information, please contact:

Mr Steve Cameron (Director)  
CW Duke,  
53 Newfoundland Circus,  
Bristol  
BS2 9AP



# Whistle Blowing Policy

## Introduction

CW Duke expects the highest standards of conduct and business integrity from every colleague. However, from time-to-time things can go wrong. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them whenever they occur. Speaking Up to disclose any form of suspected wrongdoing or unacceptable behaviour is always the right thing to do.

This policy is intended:

- to encourage colleagues to promptly report suspected wrongdoing, in the knowledge that their concerns will be taken seriously and investigated, and that their confidentiality will be respected;
- to provide colleagues with guidance as to how to raise those concerns;
- to reassure colleagues that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken; and
- to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace, including clarifying the roles and responsibilities for reporting and investigating allegations of wrongdoing.

## What is the requirement?

We expect our colleagues to speak up and report any suspected wrongdoing or breaches of the law or internal policy. When there is a reason to believe that misconduct may have occurred, we will conduct an appropriate investigation. If we determine that misconduct has occurred, then we will address it appropriately. Managers should create an environment that encourages compliance with this policy. They should encourage others to report concerns and to ask questions regarding these issues.

An appointed Director has day-to-day responsibility for this policy and has oversight of the effective completion of any whistleblowing investigations. The appointed Director has overall responsibility for such allegations in CW Duke, for deciding on any investigative actions to be taken and who will be involved in any investigation. This is necessary to ensure that the investigation is: suitably independent and objective; sufficiently thorough and focused on the correct areas of concern and carried out legally and fairly.

All colleagues are obliged to assist and fully co-operate with any investigations into alleged wrongdoing in the workplace.

## Why is it important?

Management needs to know about concerns, so compliance issues can be addressed quickly and properly. By raising concerns, you help to protect yourself, your colleagues, and the business. If you see something that raises a question or concern, you have an obligation to speak up promptly. Timeliness in reporting is essential so issues can be addressed as efficiently and effectively as possible.

## Raising concerns

We realise that it can be hard to raise concerns. Generally, people don't do so for one of two reasons. First, they may fear retaliation. When you speak up and raise genuine concerns or report suspected wrongdoing, you are doing the right thing and Kier will not tolerate any retaliation against you. If you believe someone has retaliated against you or any other colleague for raising a concern, contact the appointed person as soon as possible. Anyone who retaliates against a person for raising a concern will face action under the CW Duke disciplinary procedures, which may include dismissal. On the other hand, knowingly making false allegations will not be tolerated either. If we conclude that a person has done so, action will be taken under Kier's disciplinary procedures, which may include dismissal.

Another reason people don't raise concerns is that they fear nothing will happen. We can assure you that any time anyone raises a concern about a potential

issue, we will take appropriate action to investigate and respond. We will take any necessary corrective action, including disciplinary action when appropriate, regardless of the seniority of those persons involved. In addition to confidentiality, reporters have the option to make a report anonymously although it is often helpful to have a contact point in case further information is required to help with the investigation.

## What must I do / not do?

You must:

Speak Up where you have reason to suspect wrongdoing or danger at work. Examples include:

- criminal activity e.g. fraud, theft, bribery, corruption;
- failure to comply with any legal obligation or regulatory requirement;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;
- financial fraud or mismanagement;
- negligence;
- abusing a position of authority;
- any victimisation, harassment, discrimination or act of abuse towards any employee;
- potential modern slavery;
- breach of our internal policies and procedures e.g. Conflicts of Interest, Anti Bribery and Corruption etc.;
- conduct likely to damage our reputation;
- unauthorised disclosure of confidential information;
- the deliberate concealment of any of the above matters.

When a colleague or member of your team raises issues of the type noted above you must report that promptly to the appointed Director.

You must not:

- Ignore the issue;
- Delay reporting a concern – this could mean the issue gets more serious for all concerned;
- Try and tackle the issue yourself. This could have several unintended consequences one of which is to tip off the other party that others are aware of their activities and hamper any investigation;
- Raise concerns that you know to be untrue.
- How do I speak up?
- Some concerns can be addressed by speaking to the person whose conduct is the cause for concern. We understand that this is not always possible; if it is not, please speak to your line manager. If, for whatever reason, you do not feel comfortable doing this, you can contact the appointed Director. Alternatively, you may prefer to external third party helpline,
- Speaking up can be a difficult thing to do, so please be assured that all information received will be treated seriously and investigated appropriately. If you act in good faith, believing your information is accurate, we will protect you even if you are mistaken.
- The relevant contact information is:

### Monitoring and Review

The Company is responsible for engaging Internal Audit to independently assess compliance with this policy.

An annual audit will be carried out annually on compliance with this policy to the Senior Management Teams, which will make an independent assessment of the adequacy of the policy and disclose any material non-compliance. The Company may also make an independent assessment of the adequacy of the policy in response to an event such as an instance of bribery.

This policy has been endorsed by Mr Steve Cameron (Director), and has the full support of the management / board.

The policy was approved on **05<sup>th</sup> January 2026** following consultation with senior managers, workers, workers' representatives, and trade unions.

Overall responsibility for the effectiveness of the policy lies with Mr Steve Cameron.

For more information, please contact:

Mr Steve Cameron  
Director  
CW Duke and Sons LTD,  
53 Newfoundland Circus,  
Bristol  
BS2 9AP

A handwritten signature in black ink, appearing to read 'S. Cameron'.

S Cameron  
Director

A handwritten signature in black ink, appearing to read 'J. Porter'.

J Porter  
Director



# Anti-Facilitation of Tax Evasion Policy



It is our policy to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to the facilitation of tax evasion, whether under UK, US, or any other applicable country's law.

As an employer, if we fail to prevent our employees, workers, agents, or service providers from facilitating tax evasion, we can face criminal sanctions including an unlimited fine, as well as exclusion from tendering for public contracts and damage to our reputation. We therefore take our legal responsibilities seriously.

To adhere to our responsibilities and address those risks we ask the following of CW Duke employees and business partners.

## **Who does this policy apply to?**

This policy applies to all persons working for CW Duke in any capacity, including all employees, agency workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located.

## **What is Tax Evasion and Tax Evasion Facilitation?**

Tax evasion means the offense of cheating the public revenue or fraudulently evading UK tax and is a criminal offense. The offense requires an element of fraud, which means there must be deliberate action, or omission with dishonest intent.

Foreign tax evasion means evading tax in a foreign country, provided that conduct is an offense in that country and would be a criminal offense if committed in the UK. As with tax evasion, the element of fraud means there must be deliberate action, or omission with dishonest intent; and

Tax evasion facilitation means being knowingly concerned in, or taking steps with a view to, the fraudulent evasion of tax (whether UK tax or tax in a foreign country) by another person, or aiding, abetting, counselling or procuring the commission of that offense. Tax evasion facilitation is a criminal offense, where it is done deliberately and dishonestly.

## What you must not do

It is not acceptable for you (or someone on your behalf) to:

Engage in any form of facilitating tax evasion or foreign tax evasion;

Aid, abet, counsel or procure the commission of a tax evasion offense or foreign tax evasion offense by another person;

Fail to promptly report any request or demand from any third party to facilitate the fraudulent evasion of tax (whether UK tax or tax in a foreign country), or any suspected fraudulent evasion of tax (whether UK tax or tax in a foreign country) by another person, in accordance with this policy;

Threaten or retaliate against another individual who has refused to commit a tax evasion offense or a foreign tax evasion offense or who has raised concerns under this policy.

## Your Responsibilities

The prevention, detection, and reporting of tax evasion and foreign tax evasion are the responsibility of all those working for or with CW Duke. You are required to avoid any activity that *might* lead to, or suggest, a breach of this policy.

You must notify your manager, or the Compliance Director as soon as possible if you believe or suspect that a breach of this policy has occurred or may occur in the future.

Further "red flags" that may indicate potential tax evasion or foreign tax evasion are set out below.

### Potential Tax Evasion Red Flags

The following is a list of possible red flags that may raise concerns related to tax evasion or foreign tax evasion. The list is not intended to be exhaustive and is for illustrative purposes only.

You become aware that a third party has made or intends to make a false statement relating to tax, has failed to disclose income or gains to, or to register with, HMRC (or the equivalent authority in any relevant non-UK jurisdiction), has delivered or intends to deliver a false document relating to tax, or has set up or intends to set up a structure to try to hide income, gains or assets from a tax authority;

You become aware that a third party has deliberately failed to register for VAT (or the equivalent tax in any relevant non-UK jurisdiction) or failed to account for VAT;

A third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;

You become aware that an employee asks to be treated as a self-employed contractor, but without any material changes to their working conditions;

A supplier or other subcontractor is paid gross when they should have been paid net,

A third party requests that payment is made to a country or geographic location different from where the third-party resides or conducts business;

A third party to whom we have provided services requests that their invoice is addressed to a different entity, where we did not provide services to such entity directly;

A third party to whom we have provided services asks us to change the description of services rendered on an invoice in a way that seems designed to obscure the nature of the services provided;

You receive an invoice from a third party that appears to be non-standard or customised;

A third party insists on the use of contract amendments or refuses to put terms agreed in writing or asks for contracts or other documentation to be backdated;

You notice that we have been invoiced for a commission or fee payment that appears too large or too small, given the service stated to have been provided;

A third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us.

## **How to Raise a Concern about Tax Evasion**

You are encouraged to raise concerns about any issue or suspicion of tax evasion or foreign tax evasion at the earliest possible stage. If you become aware of any fraudulent evasion of tax in the course of your work, or you are asked to assist another person in their fraudulent evasion of tax (whether directly or indirectly), or if you believe or suspect that any fraudulent evasion of tax has occurred or may occur, the methods for raising a concern are noted below:

Your manager

Company Director



If you are unsure about whether a particular act constitutes tax evasion or foreign tax evasion, raise it with your Manager or Company Director as soon as possible.

You should note that the corporate offense is only committed where you deliberately and dishonestly take action to facilitate the tax evasion or foreign tax evasion. However, a deliberate failure to report suspected tax evasion or foreign tax evasion, or "turning a blind eye" to suspicious activity could amount to criminal facilitation of tax evasion.

CW Duke has a strict policy of anti-retaliation towards those who raise concerns.

The policy was approved on **2<sup>nd</sup> January 2026** following consultation with senior managers, workers and workers' representatives.

For more information, please contact:

Mr Steve Cameron (Director)

CW Duke & Sons Ltd, 53 Newfoundland Circus, Bristol, BS2 9AP

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Steve Cameron  
Director

A handwritten signature in black ink, appearing to read 'J Porter'.

J Porter  
Director

## Privacy Policy

This privacy policy sets out how CW Duke uses and protects any information that you give CW Duke. CW Duke is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified, then you can be assured that it will only be used in accordance with this privacy policy. CW Duke may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from 01/01/2017.

### What we collect

We may collect the following information:

- Name
- Email Address
- Company Name
- Demographic information such as postcode, preferences and interests
- CV- If you attach your CV we will then hold this information too.

### What we do with the information we gather

We require this information to understand your needs and provide you with a better service, in particular for the following reasons:

- Internal record keeping.
- We may use the information to improve our products and services.
- From time to time, we may also use your information to contact you for market research and feedback purposes.
- We may contact you by, email or phone. We may use this information to customise the website accordingly.

### Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online. CW Duke have a data protection policy, available on request.

### How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.



Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

### **Links to other websites**

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

### **Controlling your personal information**

You may choose to restrict the collection or use of your personal information in the following ways:

- Whenever you are asked to fill in a form on the website, look for the box that you can click to indicate that you do not want the information to be used by anybody for direct marketing purposes.
- If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing us at [sales@cwduke.co.uk](mailto:sales@cwduke.co.uk)

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so.

You may request details of personal information which we hold about you under the Data Protection Act 1998. A small fee will be payable. If you would like a copy of the information held on you please write to CW Duke LTD 52 Newfoundland Circus, Bristol, BS2 9AP.

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect.



This policy has been endorsed by Mr Steve Cameron (Director), and has the full support of the management / board.

The policy was approved on **2<sup>nd</sup> January 2026** following consultation with senior managers, workers, workers' representatives, and trade unions.

Overall responsibility for the effectiveness of the policy lies with Mr Steve Cameron. Amanda Gale is the lead on storing and processing of data.

For more information, please contact:

Mr Steve Cameron  
Director  
CW Duke & Sons Ltd  
53 Newfoundland Circus,  
Bristol  
BS2 9AP

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S Cameron  
Director

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J Porter  
Director