

Corporate Compliance Policy

2024



Amendment Record

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**Williams Shipping incorporates the following companies:
Williams Shipping Holdings Ltd, Williams Shipping Marine Ltd, Williams
Shipping Transport Ltd, Williams Marine Lubricants Ltd, Willbox Ltd &
Woodpecker Ltd**

Director's Statement

The policies outlined in this corporate compliance policy are in recognition of our commitment in caring for our employees, customers, all others affected by our activities and for the environment. The aim of this policy is to help us all to follow Williams Shipping's (the company) principles of business conduct in ensuring compliance with all necessary legal requirements, internal policies, voluntary commitments and ethical principles.

Integrity is one of the key elements of our culture and provides the foundation for this policy. However, it is not enough to simply take note of the policies; what matters is that we take these compliance principles to heart and, above all, that we live by them; that applying these principles becomes second nature to us.

We would particularly like to emphasize that, to us, this policy is not simply a question of formal compliance with legal requirements, rules and regulations, or avoiding possible penalties. What counts is that each of us is truly convinced of the importance of always acting in accordance with these principles. Let us work together to successfully ensure these policies are effective.

Dated: 24th January 2024



**Philip Williams
(Managing Director – Marine)**



**Jonathan Williams
(Managing Director – Logistics)**



**Christopher Williams
(Managing Director – Willbox)**

HEALTH & SAFETY POLICY

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WILLIAMS SHIPPING

HEALTH & SAFETY POLICY STATEMENT

This 'Health & Safety Policy' follows the requirements of the 1999 Management of Health & Safety Regulations and 1992 Workplace Health Safety & Welfare Regulations.

These, and indeed other existing Health & Safety regulations within the 1974 Act, require the identification, assessment, and control of risks. Williams Shipping fully support this approach as it is in the best interests of the company, its employees, contractors, customers and those who may be affected by their work activities. The company will fully comply with the duties placed upon it within the requirements of all relevant statutory legislation and approved guidance. This includes legislation produced by the Maritime and Coastguard Agency.

Williams Shipping are fully committed to the prevention of injury and ill health and to continually improve health and safety management and performance. The company adopts the HSE's 'Managing for Health and Safety' (HSG65) guidance and the Plan, Do Check, Act approach. To this end it has established systems to set, achieve and review measurable health and safety objectives.

Williams Shipping accepts its responsibilities to ensure, so far as is reasonably practicable, the health and safety of all of its employees whilst at work. Health and Safety will always be given the highest priority across the business.

The Policy sets out the following three main objectives:

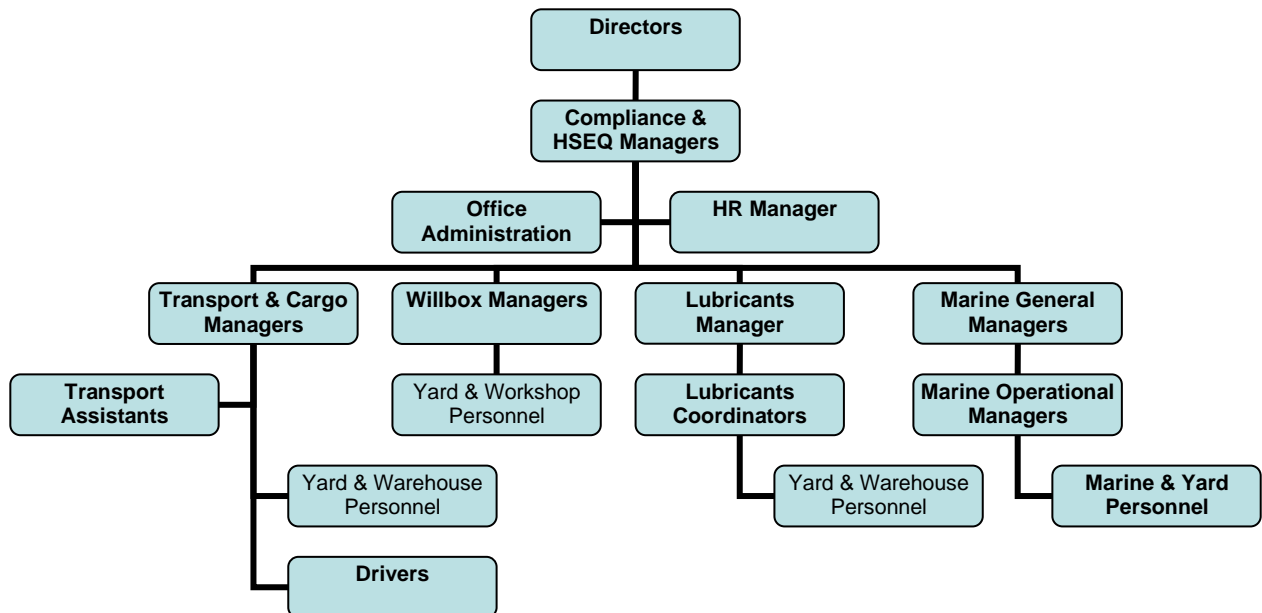
1. To provide the framework for developing a safety culture within the company including adequate financial resources. This will include information, instruction & training, adequate supervision, safe working environments and practices, carrying out suitable risk assessments and consultation with employees. Also facilitate the continuous improvement of safety management skills, including emergency preparedness, both ashore and aboard ships
2. To specify management / supervisor and employee responsibilities which include safety responsibilities to themselves and to others who may be affected by their acts or omissions. To co-operate with their employer in complying with their statutory duties under sec.7 1974 Health & Safety at Work Act. And to take necessary steps to ensure that all risks are adequately controlled 'so far as is reasonably practicable'
3. To secure the co-operation of clients, suppliers, contractors and the involvement of all employees in achieving safe working environments incorporating safe systems of work leading to control of potential accidents

Employees must also refer to the appropriate company health and safety and operational information relating to their work activities. This information is contained in the employee handbook.

The company is committed to meeting the requirements of ISO45001:2018, the ISM Code, all relevant regulatory requirements and guidance and will continue to review opportunities to improve systems and operations to ensure that there is continual improvement.

2.0 Organisation & Responsibilities

2.1 Health & Safety Organization Chart



2.2 The Directors

- Initiate the company's policy for the promotion of good health, the prevention of injury to the workforce and the public including damage and wastage to property.
- Ensure that the Policy is applied and arrange for funds and facilities to meet the requirements of the policy.
- Ensure that all levels of staff receive adequate and appropriate training.
- Ensure that arrangements are made for the provision of adequate manning, welfare facilities and equipment to ensure the implementation of the company's policy for all work activities.
- Institute proper reporting, investigation and costing of injury, damage loss, promote action to preclude and initiate analysis to discover accident trends.
- Ensure that any member of staff failing to discharge satisfactorily the responsibilities to him is reprimanded.
- Set a personal example, including the wearing of or use of personal protective equipment.

2.3 Managers

Managers of all functions are responsible for ensuring that the policy is extended into more detailed arrangements. They should provide adequate resources to meet the health and safety programme and support all persons carrying it out.

Directors and managers having responsibilities for functions, work areas or employees, will be responsible for all health and safety matters within those functions and areas. Where there are exceptions or additions to this requirement they will be specified and notified to those concerned. It is the responsibility of all managers to advise the particular director to whom they are responsible, of any instance where they or their staff, for any reason, are prevented from carrying out their responsibilities in this field, or where their instructions are being ignored by those responsible to them.

MANAGERS MUST:-

- a) Ensure that all personnel, for whom they have a responsibility, know and accept their involvement as stated in this policy
- b) In co-operation with the compliance managers, plan and implement a health and safety programme with the object of upgrading health and safety performance
- c) Ensure all tasks and activities undertaken in their department are adequately risk assessed. Managers can undertake the risk assessments themselves or ask for assistance from a compliance manager
- d) Ensure that all employees are properly trained and that new employees receive adequate, initial safety training and induction prior to starting work in their department
- e) Ensure that within their function all work is carried out in compliance with statutory requirements, codes of practice and company rules
- f) Ensure that consideration is given to matters relating to health, safety and fire precautions in all operations, methods of work, plant and equipment
- g) Monitor the work of all subordinate supervisory staff and stimulate their interest and involvement in health and safety
- h) Ensure that the appropriate supervisory staff are available for, and involved with, safety inspections
- i) Ensure that all personal injury accidents and dangerous occurrences are dealt with as detailed in this policy
- j) Take part in particular investigations of hazards and accidents, as required, and implement action to prevent these occurring in future
- k) Ensure that a system for reporting hazards is implemented and monitored at regular intervals
- l) Encourage the constructive participation of employees in health and safety activities
- m) Consult at an early stage with a compliance manager when working on new projects / contracts or planning proposed installations, including new equipment, so that suitable advice can be given on health and safety matters

MANAGERS MUST also ensure that their staff:-

- a) Have received initial safety training and are familiar with the health and safety policy
- b) Are adequately trained and fully aware of any hazards in the department
- c) Know what to do in the event of a fire and other emergencies
- d) Know the whereabouts of first aid facilities and the procedure for reporting accidents, dangerous occurrences and hazards.
- e) Continually develop safe practices in their department, to ensure maximum safety for all persons.
- f) Report all accidents and "near misses" and involve the safety manager as well as report to directors
- g) Maintain a high standard of good housekeeping in their department at all times

2.4 General Employees

Employees at all levels have a personal or legal responsibility for their own safety and that of others. Everyone is expected to be involved in the maintenance and improvement of health and safety standards within the company. Such involvement will vary, depending on the individual's position and duties. However, minimum requirements are as follows:

EMPLOYEES MUST:

- a) Comply with appropriate legal requirements and company health and safety rules and co-operate with the company on all health, safety and environmental matters
- b) Inform their manager of any disability or illness which could prevent them safely carrying out certain operations or the job role they are employed in
- c) Work in the interests of both themselves and any other persons who may be affected by their actions
- d) Wear and use protective clothing and equipment provided by the company, use appropriate safety devices at all times and adhere to safe systems of work procedures where required
- e) Report to their manager all accidents, damage and/or "near misses" - whether or not there are any personal injuries, in order that remedial action can be taken immediately
- f) Report unsafe conditions to their manager
- g) Be fully aware of, and comply with, all rules, regulations and codes of practice affecting health and safety
- h) Apply good housekeeping in the area in which they work

- i) Maintain an interest in the efforts of the company compliance managers and in any other initiatives designed to improve safety
- j) Attend safety training in accordance with the company's requirements
- k) Attend periodic employee health & safety meetings
- l) Not undertake any activity unless they have suitable training or experience to perform the task safely and carry out all activities in accordance with relevant risk assessments and method statements
- m) Adhere to all procedures and rules outlined in the employee handbook

3.0 Arrangements

Williams Shipping operates a safety management system (SMS) to assist in the implementation of this policy. The SMS incorporates all legal, mandatory and functional requirements as outlined in ISO 45001:2018 and the ISM Code (2014 Edition) and all other relevant regulations, guidance and standards.

3.1 Safety Consultation

Williams Shipping recognises the requirements of The Safety Representatives and Safety Committees Regulations 1977 as amended and supports the appointment of safety representatives and, if necessary, the establishment of a safety committee or other means to comply with The Health and Safety (Consultation with Employees) Regulations 1996.

Williams Shipping believe that safe working cannot be achieved without management and employee participation in matters relating to health and safety. Therefore, observance of the Consultation with Employees Regulations 1996 is incorporated. Consultation with employees is direct with the exception of LGV drivers who have an elected representative. Regular periodic employee health and safety meetings are held throughout the year.

3.2 Inspections and Audits

Regular safety inspections are necessary to ensure safe operations in the workplace. A report should be produced by the compliance manager and sent to the director responsible for the location. Supervisory staff carry out safety inspections of the working areas under their control, accompanied, where appropriate, by the compliance manager.

Regular internal audits against ISO45001:2018 and the ISM Code will be carried out throughout the year on a minimum annual basis. However, a compliance manager may decide to carry out additional audits depending on needs and circumstances.

3.3 Safe Operating Procedures

A permit to work system will be used for all enclosed spaces, hot works and fuel transfer work. Other permits to work will be used where appropriate. Safe

operating procedures are established across all divisions of the business. All operating procedures are incorporated into work manuals and other relevant documents.

3.4 Accident Reporting, Investigation and Prevention

Regular and systematic consideration of matters concerned with the prevention of accidents is essential. This will include statistical analysis, highlighting trends, identifying particular hazards and implementing recommendations for preventative action.

Reporting of and an investigation of all accidents, dangerous occurrences and "near misses" will be carried out via the Incident Report form. Any serious / major injuries will be thoroughly investigated using the 'Serious & Major Injury Report and Investigation Form.' All accidents will be recorded in the Accident Record Book.

Investigation and reporting of such incidents is vital to the elimination of injuries, property damage and any consequential losses. The co-ordination of such investigations is the responsibility of the compliance manager who will ensure that proper records are produced and maintained. The compliance manager will also ensure that any incidents that are reportable to the HSE or the MAIB are promptly reported within the timeframe specified within the regulations.

3.5 Procedures for New Employees

Williams Shipping will ensure that all new employees are fully inducted before they commence work and the induction will include the following:

- Briefed on what he/she will be required to do and to whom he/she will be directly responsible to
- Be made aware of his/her responsibilities and read the Health & Safety Policy
- Issue a copy of the Operations Handbook (where applicable) to read during induction
- Read all relevant risk assessments and safe systems of work pertinent to their job role
- Ascertain if new employee has any disability or illness which could prevent him/her safely carrying out certain operations/job role they are being employed to do and determine if additional protective measures are required
- Inform new employee of any prohibited actions in the workplace, e.g. entering specific areas without safety clothing, operating machinery unless authorised and so forth
- Issue any protective clothing or safety equipment required for their job role
- Carry out a full site induction and highlight first aid arrangements, fire prevention, emergency procedures, accident and near miss procedures and

incident reporting

- Undertake a vehicle / vessel induction prior to working on that vessel / vehicle

3.6 Employees Under 18 Years of Age

In accordance with the Management of Health & Safety Regulations 1999, Williams Shipping will carry out a separate young persons' risk assessment for any employee under the age of 18. The risk assessment should take into account the potential limitations of a younger worker including their lack of experience, absence of awareness of existing or potential risks and a lack of maturity.

3.7 General Fire Protection and Maintenance

Williams Shipping appreciates the importance to ensure that no person is at risk due to fire or explosion. There will always be adequate protection against these hazards. The fire alarm system, the means of escape and equipment provided to fight a fire, will be fully maintained, regularly inspected and tested, with records being kept in accordance with legislation. Compliance with the 'Regulatory Reform (Fire Safety) Order 2005' will be observed which requires all organisations to carry out their own Fire Risk Assessment.

The most important facet of our fire prevention policy is training in fire prevention itself. To this end Williams Shipping requires all levels of management and employees to become thoroughly familiar with the requirements of fire prevention and fire fighting and to have an understanding of the causes and nature of fire. Fire drills will be carried out and the results will be recorded and appraised.

3.8 Health and Hygiene

Williams Shipping will promote high standards of health and hygiene at the place of work and will implement the appropriate Health Safety & Welfare legislation, codes of practice or guidelines concerning health, hygiene and appropriate food hygiene.

The company recognises that certain work activities have the potential to cause adverse long term health issues. All such hazards will be assessed and appropriate control measures established to ensure no employee is at risk of any occupational health related illness from their work activities whilst employed at Williams Shipping. If required, health surveillance arrangements will be put in place for employees where exposure times exceed certain levels. This will be identified in the activity risk assessment.

3.9 Noise

Williams Shipping is aware of the problems associated with excessive workplace noise and occupational hearing loss issues. The company will implement the requirements of the Noise at Work Regulations 2005 and associated guidance. The methods will include assessments of noisy areas and control by the following hierarchy of control measures: Firstly at source; secondly by isolation and enclosure or; finally through limitation of exposure time and the use of ear protection.

3.10 Display Screen Equipment (DSE)

Williams Shipping will ensure that employees use of display screen equipment does not adversely affect their health. All workstations will be assessed to determine the comfort level of all D.S.E. users. Information & Instruction, eye tests, corrective spectacles and other equipment will be provided for all DSE users as necessary.

3.11 Smoking, Alcohol & Drugs

Smoking is discouraged for obvious health reasons. Smoking is not permitted in any company property. This includes all vehicles and marine vessels.

Williams Shipping recognises the impact that both alcohol and drugs may have upon an individual's ability to work safely and correctly and as such, aims to ensure a working environment free from the inappropriate use of substances, where employees are able to carry out their duties in a safe and efficient manner. As such, Williams Shipping does not condone or tolerate its employees being under the influence of alcohol and/or drugs whilst representing the company in any way.

Staff must not drive for work, operate vessels or work equipment if their ability to do so safely is impaired by alcohol, drugs or medicine. Failure to comply with the policy will be regarded as a serious disciplinary matter. Acceptable maximum blood alcohol levels are established by the HSE and MCA for driving, operating plant and working on ships. All employees must ensure they are within these levels whilst working for Williams Shipping.

All employees must:

- be aware that they may still be over the limit, or affected by alcohol the morning after they have been drinking
- be aware that prescription drugs or over-the-counter medicines can affect driving and operating equipment and can cause sleepiness
- report to their manager any use of prescription drugs or over-the-counter medicines that can affect driving and operating equipment and that can cause drowsiness/sleepiness
- report to their manager any drug and/or alcohol dependency problems
- report to their manager any police cautions, summons or convictions for alcohol and/or drug related offences
- co-operate with monitoring, reporting and investigation procedures

To assist in the successful implementation of this alcohol and drug policy, the company reserves the right to have tests carried out on employees on a random basis and following any incident, where there is reasonable suspicion that alcohol and/or drug use may have been a contributory factor. The company also reserves the right to have tests carried out when a company manager or supervisor has reasonable cause to suspect that a Williams Shipping employee is under the influence of alcohol and/or drugs and/or their work performance is impaired as a result of using alcohol and/or drugs.

If an employee is tested for drugs or alcohol outside of the employment context and the results indicate a violation of this policy, or if an employee refuses a request to submit to testing under this policy, the employee may be subject to appropriate disciplinary action, up to and possibly including dismissal from employment.

3.12 Tools and Equipment

Williams Shipping employees are only allowed to operate tools and equipment that they have been authorised to use. Any equipment that is found to be faulty should not be used and reported to the department manager immediately. The manager will ensure the equipment is repaired / replaced promptly. Employees are responsible to ensure all equipment is used in the manner it was designed to be used.

Department managers and compliance managers will monitor and review the suitability of work equipment to ensure that all equipment is the most suitable for the given task. Williams Shipping will ensure all equipment is maintained, serviced and is compliant with current regulation. All work equipment is to be inspected on a regular basis and check sheets, where appropriate, submitted to the office. All portable electrical equipment will undergo regular portable appliance testing (PAT).

All lifting equipment and accessories are subject to thorough examination and inspection regimes as required by relevant statutory instruments and Williams Shipping safe systems of work. All operatives who use this equipment will carry out checks prior to each use and relevant documentation is completed to confirm such equipment is safe to use.

3.13 Personal Protective Equipment (PPE)

At their induction employees will be issued with all the necessary PPE required for the tasks they will be undertaking. Compliance managers will monitor and review, on a regular basis, the effectiveness and suitability of all PPE. Employees are encouraged to provide feedback and suggestions related to the use of PPE. It is a condition of employment for employees to wear PPE as directed by the company. Any PPE that is lost, no longer fit for use or defect in any way will be replaced.

3.14 Control of Substances Hazardous to Health (COSHH)

Some materials used and stored by Williams Shipping are hazardous and call for special precautions to use and store.

The company will provide a COSHH assessment and/or a material safety data sheet for all such products. A copy of the assessments and/or data sheet will be available at the location they are used and stored and appropriate PPE will be worn when working with or handling them. Employees must comply with the guidelines set out in the COSHH assessment sheet/and or the material data safety sheet.

First aid arrangements will be established to respond to any incidents involving COSHH products.

3.15 First Aid, Health and Medical Services

Industrial nursing and/or first aid services to the statutory standard will be provided through access to occupational health services and trained first aiders, ensuring that all workplaces have adequate facilities available to enable first aid to be rendered to any injured person. In the case of ill health or injury, the company reserves the right, when necessary, to refer an employee to a company appointed doctor or occupational therapist.

Williams Shipping will provide adequate and appropriate trained first aiders and first aid provisions across all workplaces commensurate with the workplace environment and to the minimum requirements established in the relevant first aid regulations and guidance (The Health and Safety (First Aid) Regulations 1981 – as amended 2015).

Williams Shipping will maintain qualified mental health first aiders. If any employee is concerned about stress in the workplace, or have any mental health or anxiety concerns, they are encouraged to talk in confidence with a mental health first aider. Company mental health first aiders will maintain confidence at all times and treat employees with compassion and care.

3.16 Welfare

Williams Shipping observe the Workplace Health, Safety and Welfare regulations 1992 emphasis on Regulation 25 (1), (2), (3), (4) and (5). Also ACOPs on Facilities for Pregnant Women and Nursing Mothers, the Prevention of Discomfort Caused by Tobacco Smoke, and Schedule 1 Regulations 10 and 20 Part -1-Space (1), (2) and (3), Part 2 - Number of Sanitary Conveniences (4), (5) and (6).

3.17 Training

Induction training will be provided for all new employees and will include instruction designed to acquaint all newly employed, temporary staff and transferred employees with those general aspects of health and safety required of them in their job (see section 'Procedure for New Employees' – 3.5 of this policy).

Job training will be provided against relevant job specification. The nature and level of training will be determined by appropriate risk assessments for the tasks related to the job, relevant regulatory requirements and Williams Shipping best practise. A training matrix will be maintained and regularly reviewed for all Williams Shipping employees. Compliance managers will consult with managers and employees about the effectiveness of all training and the future training requirements for each division of Williams Shipping. Feedback from employees will be sought for all external training. All training will be undertaken during work time.

Williams Shipping recognises as fundamental to the process of this health and safety policy that all management should receive the training necessary for them to be able to become aware of hazards in the areas which they control and to institute and monitor the procedures necessary to deal with these hazards.

The training and experience of the compliance managers should include a suitable level of training to enable him/her to give adequate on site day to day advice and to develop the Williams Shipping health and safety management system. Membership of a recognised safety organisation will be maintained. Compliance managers will pursue CPD (continued professional development) and be associated with a recognised Health & Safety organisation.

3.18 Marine Vessel Management

Williams Shipping will maintain all marine vessels to a very high standard. All vessels will operate according to the MCA 'Safety of Small Workboats & Pilot Boats' code of practice and all other MCA regulatory requirements. Williams Shipping operates a safety management system to meet the requirements of health and safety standards and codes including ISO45001:2018, ISM Code (2014 edition) and Code of Safe Working Practices for Merchant Seafarers (2015 edition).

Daily checks and a fault reporting system will be used to ensure this standard is met. A database of all certification dates including all lifesaving appliances (LSA) will be kept to ensure no certification expires. All crew members are issued with an operatives' handbook with all company rules and procedures clearly outlined for operating company vessels.

3.19 Large Goods Vehicles (LGV) Management

Transport managers will ensure that all LGV's and trailers are safe for use on a daily basis. All drivers will complete a daily vehicle inspection sheet and return to the traffic office. A database of all servicing and inspections will be maintained. Drivers are responsible for ensuring safe operating procedures for all work involving their vehicle and trailer. All drivers can decline a request for loading / unloading their goods on the grounds of health and safety and seek immediate advice from the traffic office. Transport managers will ensure that all operations will take place in compliance with all relevant transport regulation.

A lifting & load restraint policy is established to ensure such equipment is always safe to use. All drivers are issued with an Operations Handbook with all company rules and procedures clearly outlined for operating company vehicles.

3.20 Contractors

Contractors working on Williams Shipping premises or property will be required to comply with statutory requirements, safety standards and site rules established by Williams Shipping. A copy of the safety rules for contractors and self-employed persons will be provided to and signed for by the contractor.

All contractors engaged to carry out work on behalf of Williams Shipping will be required to supply all necessary documentation outlining their safe systems of work and control of hazards for the work they will engage in. This documentation will be approved by the manager engaging the contractors or a company compliance manager prior to the contractor commencing work. If the proposed safe system of work is inadequate, the contractor will not be permitted to commence work.

Before commencement of work, contractors will be made aware of the company's attitude to health and safety through an induction meeting, during which any Williams Shipping site rules, risk assessments and method statements will be fully explained by the manager engaging such contractors. Where appropriate, permits to work will be issued.

When engaging contractors, managers should bear in mind vicarious liability if the procedures are not followed. To ensure this does not happen all contractors will be monitored

3.21 Agency/Temporary Personnel

Managers engaging agency/temporary personnel should ensure that they are adequately trained for the duties they are required to undertake. Should these employees require PPE for their work it will be provided on site before they commence work. All temporary staff will receive an induction applicable to their work task and read and sign the company health and safety policy and (when applicable) the operations handbook and or the relevant safe systems of work.

3.22 Visitors and Customers

It is our duty to ensure the health and safety of visitors and customers to our premises. All staff are responsible for their own visitors and must brief them on evacuation in case of an emergency and should escort (or request a colleague to escort) them to the assembly point.

All visitors will be signed "in" and "out". Most visitors will be accompanied at all times by the person they are visiting. In the case of a visitor not being accompanied during their time on the premises, at the time of their signing in they will be briefed in the emergency procedures (including site assembly point) and any relevant hazards.

3.23 Stress

Williams Shipping recognise that workplace stress is a health and safety issue and acknowledge the importance of identifying and reducing workplace stressors. The Health and Safety Executive defines stress as "the adverse reaction people have to excessive pressure or other types of demand placed on them". This makes an important distinction between pressure, which can be a positive state if managed correctly, and stress which can be detrimental to health.

Stress can have an adverse effect on an individual which will often be manifested by ill health. The company recognises that depression, anxiety and many other mental health issues can result from chronic stress. The company encourages all employees, who feel that stress in the workplace is affecting their health, to speak openly and in confidence with a director about the matter. The company will provide all possible assistance to assist any employee experiencing health issues due to stress in the workplace.

The company will identify any workplace stressors and if necessary conduct risk assessments to eliminate stress or control the risks from stress. The company will provide adequate resources to implement any required stress management strategy. Individual cases of workplace stress will be assessed and if required necessary action will be taken to reduce the causes of stress.

3.24 Lone Working

In general, there is no requirement for lone working across all of Williams Shipping activities. With hazardous tasks, certain work locations or with certain personnel involved, lone working is not permitted. In such cases, the work activity is risk assessed and arrangements are established to ensure no worker is alone for the duration of the task/activity.

A risk assessment will be completed in the case where a task or activity can be carried out alone or on a remote site. Necessary control measures will be established ahead of any such lone working activities.

3.25 Fatigue

Williams Shipping operate machinery/equipment and engage in activities that have the potential for serious negative consequences if carried out by an operative in fatigued or tired state. We recognise that fatigue, and a general feeling of tiredness will result in a reduced ability to perform work effectively and therefore safely.

The company will establish arrangements to ensure all statutory requirements for rest periods are established and monitored. Employee work hours are monitored on a daily/weekly basis and control measures are established to ensure all employees get sufficient rest periods. If there is any issue with a fatigued employee, action will be taken immediately to ensure the employee receives sufficient rest/sleep until they have recovered.

All employees have a responsibility to ensure they get sufficient rest ahead of any work period. Employees are required to report to their manager if, due to their work shift/pattern, they are feeling fatigued and require temporary adjustments to their work schedule to allow additional rest time/sleep. They are also required to inform the company of any health issues that are causing them to be fatigued or that is resulting in them feeling tired and not able to perform safely on a continuous basis.

3.26 Bullying, Harassment and Victimisation

The company will not tolerate, under any circumstances, bullying, harassment or victimisation of any kind. Any incidence of such will be dealt with promptly and any employee found to have engaged in such will be subject to disciplinary action. The company will not tolerate bullying or harassment by any 3rd party toward an employee regardless of relationship to the company.

All employees are encouraged to report any bullying, harassment or victimisation whether they are the victim of or the witness of such. They can speak to a director, in confidence, at any time if they have been subject to any bullying, harassment or victimisation in the workplace. All such cases will be handled with discretion and all necessary action will be taken to prevent any further occurrence.

The company recognise that cyber bullying is a growing problem which may affect their employees and third parties. Cyber-bullying is an aggressive, intentional act carried out by a group or individual using electronic forms of contact.

By cyber-bullying, we mean bullying by electronic media:

- Bullying by texts or messages or calls on mobile phones
- The use of mobile phone cameras to cause distress, fear or humiliation
- Posting threatening, abusive, defamatory or humiliating material on websites, to include blogs, personal websites, social networking sites
- Using e-mail to message others
- Hijacking/cloning e-mail accounts
- Making threatening, abusive, defamatory or humiliating remarks in chat rooms

The company has an equality policy which endorses *The Equality Act 2010* and serves to protect employees against discrimination by way of bullying, harassment and victimisation in relation to the protected characteristics contained within the equality act. However, the company recognises that bullying, harassment and victimisation can be manifested in many ways and is not limited to the areas outlined in the equality act.

ENVIRONMENTAL POLICY

Williams Shipping is an environmentally conscious company. As a multi disciplined organisation we recognise the impact of our operations on the environment and therefore strive to achieve a high standard of environmental performance and to be committed to continual improvement. Priority will be given to preventing and reducing pollution, emissions and waste to their lowest practicable levels and we will promote and maintain correct waste collection, disposal and recycling arrangements across our operations.

To assist in achieving this objective Williams Shipping has implemented and maintains a documented Integrated Management System. This has introduced systems that will set, achieve and review measurable environmental objectives.

The company will fully comply with the duties placed upon it within the requirements of statutory legislation and approved guidance. This takes into consideration legislation produced and enforced by the Environment Agency, the Maritime and Coastguard Agency and any other relevant stakeholders.

All employees will be provided with the necessary resources, equipment, instruction and training to carrying out their duties with concern for the environment. This Policy is communicated to all staff (and sub-contractors) through e.g. notice boards, staff induction and training. All sub-contractors are expected to comply with this policy and co-operate fully with all company arrangements for the protection of the environment. This policy is available to all stakeholders through the website.

All environmental incidents/accidents at a work location will be fully reported, investigated and submitted to the board of directors for appropriate corrective and preventive action to be agreed and implemented.

The Directors have overall responsibility for all environmental matters and are committed to meeting the requirements of all environmental legislation, ISO14001:2015 and applicable industry guidance. The company will continue to review opportunities to improve systems and operations to ensure that there is continual improvement.

QUALITY POLICY

Williams Shipping aims to develop and maintain an effective and efficient service that satisfies the needs of the most exacting client/customer in a timely and cost effective manner. This is achieved by consistently conforming to agreed requirements, policies and procedures.

It is the policy of the company to provide and maintain safe and healthy working conditions, equipment and systems of work for all employees and such information, training and supervision as may be needed. In doing so the company will endeavour to meet clients'/customers' expectations and where possible, respond to unplanned requirements as quickly as possible.

The SHEQ Manual describes the quality system in operation at Williams Shipping. It explains the way in which the system is operated and defines those employees responsible for the performance of quality related tasks within the company.

The quality system is the means by which the company supports its policy of providing to its customers a high quality service in accordance with all relevant standards and customer requirements and to provide these products on time.

It is company policy to review the suitability of the quality system to ensure it reflects current operations, and where necessary to implement additional changes.

The company is committed to meeting the requirements of ISO9001:2015 and will continue to review opportunities to improve systems and operations to ensure there is continual improvement.

EQUALITY POLICY

Williams Shipping is committed to an active equality policy from recruitment and selection, through training and development, appraisal and promotion to retirement. It endorses and promotes the requirements of *The Equality Act 2010* and all other relevant legislation and guidance.

It is also our policy to promote an environment free from discrimination, harassment and victimisation where all our employees, customers, contractors, visitors and 3rd party suppliers, regardless of any of the following protected characteristics of:

- age
- disability
- sex
- race
- gender reassignment
- marital status
- sexual orientation
- religious or philosophical belief and lack of belief
- pregnancy and maternity

receive equal treatment. Williams Shipping believe that it is in the best interests of the company, and all who work in it, to ensure that all the human resources, talents and skills available are considered when employment opportunities arise.

To this end, within the framework of the law, Williams Shipping is committed, wherever practicable, to achieving and maintaining a workforce that broadly reflects the local community in which it operates.

Williams Shipping is opposed to all forms of unlawful and unfair discrimination. We recognise that the cultivation of a diverse workforce and the provision of equality in the workplace is not only good management practice; it also makes sound business sense. Our intention is that all employees, without exception, are treated with dignity and respect.

The company will not tolerate discrimination on any of the following grounds, whether it is an employee, customer, visitor or 3rd party supplier:

- Direct or indirect discrimination because of a protected characteristic an individual has, or is thought to have (perceptive discrimination) or because an individual associates with someone who has a protected characteristic (associative discrimination)
- By expecting an individual solely on the grounds of a protected characteristic to comply with a requirement(s) for any reason whatsoever related to their employment, which is different to the requirements of others

BRIBERY AND CORRUPTION POLICY

Under no circumstances or at any time will bribery or corruption be tolerated within Williams Shipping. It is one of the company's guiding principles that it will never engage in bribery and corruption. The company's growth and success will never be a result of bribery and corruption. The company will establish arrangements to monitor and manage any incident of bribery and corruption by any employee.

All Williams Shipping employees are not permitted to accept any bribe, gift or hospitality from any customer, supplier or any other person without first seeking permission from a company director.

Offering a bribe, gift or hospitality to obtain business is strictly prohibited under any circumstances by all employees. Any business gifts or invitations to hospitality that are issued must always be agreed, in advance, by a company director.

Any employee found to have accepted or given a bribe will face disciplinary action which could result in dismissal for gross misconduct. All employees are responsible to report immediately to a director any suspicion of bribery or corruption within Williams Shipping.

CORPORATE SOCIAL RESPONSIBILITY POLICY

Williams Shipping adopt the following corporate social responsibility policy:

- We recognise that we must integrate our business values and operations to meet the expectations of our stakeholders. They include customers, employees, investors, suppliers, the community and the environment
- We recognise that our social, economic and environmental responsibilities to these stakeholders are integral to our business. We aim to demonstrate these responsibilities through our actions and within our corporate policies and maintaining accreditation to the following standards: ISO 9001, ISO 14001 & ISO 45001
- We take seriously all feedback that we receive from our stakeholders and, where possible, maintain open dialogue to ensure that we fulfil the requirements outlined within this policy
- The company directors are responsible for the implementation of this policy and will make the necessary resources available to realise our corporate responsibilities. The responsibility for our performance on this policy rests with all employees throughout the company

Our Focus:

We shall provide, and strive to maintain, a clean, healthy and safe working environment in line with our health and safety policy and safe systems of work

We shall operate an equal opportunities policy for all present and potential future employees and will offer our employees clear and fair terms of employment and provide resources to enable their continual development

We shall provide safeguards to ensure that all employees of whatever nationality, colour, race or religious belief are treated with respect and without sexual, physical or mental harassment

We shall support and encourage our employees to help local community organisations and activities in our region, particularly our company chosen charity

We shall support young workers by promoting and facilitating apprentices

We shall maintain a clear and fair employee remuneration policy and shall maintain forums for employee consultation and business involvement

We shall encourage suppliers and contractors to adopt responsible business policies and practices

We will register and resolve customer complaints in accordance with our Quality Management System

MEDIA POLICY

This policy sets protocols for dealing with the media and responding to all media enquiries. Williams Shipping recognize they have a responsibility to be open and responsive to all information requests because the media are among the many ways our customers and business partners build their individual perceptions of Williams Shipping and the work we do.

This policy exists to assure that information disclosed by Williams Shipping is timely, accurate, comprehensive, authoritative and relevant to all aspects of our activities. Adherence to this policy is intended to provide an effective and efficient framework to facilitate the timely dissemination of information.

Employees are not permitted to initiate contact with the media unless authorised by a company director. All requests for information from any media outlet will be immediately referred to a company director. Employees are not permitted to engage with a media outlet unless authorised by a company director. The company may choose, at any given time, to engage a public relations organisation to handle communications with the media.

The company at times may enter a non-disclosure agreement with a customer. In such cases the company will fully comply with the agreement with regarding to media contact and disclosures.

SOCIAL MEDIA POLICY

Social media is an interactive online media that allows users to communicate instantly with each other or to share data in a public forum. It includes social and business networking websites such as Facebook, Twitter, Whatsapp, LinkedIn ect. Social media also covers video and image sharing websites such as Youtube, Flickr, Instagram, TikTok, as well as personal blogs. This policy applies to all existing social media sites and any future sites that become available.

Employees are not permitted to upload any company or work related content, including photos, to any social media sites or personal accounts. This restriction also applies when working on a third party site. An employee will require permission from a company director prior to uploading any work related content to a social media site.

Williams Shipping may use social media outlets to share information and for marketing purposes. All such engagement will be carried out by the company marketing department and will be authorised by a company director. Employees are not permitted to publically add to or comment on any material posted by the company on a social media outlet.

The company at times may enter a non-disclosure agreement with a customer. In such cases the company will fully comply with the agreement with regard to social media use.

MODERN SLAVERY POLICY

Williams Shipping recognizes that the Modern Slavery Act 2015 defines modern slavery as slavery; servitude and forced or compulsory labour; and human trafficking. The Modern Slavery Act 2015 requires commercial organisations who supply goods or services and have a minimum total turnover of £36 million per year to prepare a slavery and human trafficking statement for each financial year.

The Williams Shipping group annual revenue is less than £36 million and whilst we do not produce such a statement we are committed to ensuring there is transparency in our business and in our approach to modern slavery throughout our supply chain. We expect the same high standards from all our contractors, suppliers, and other business partners.

We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to ensure that modern slavery is not taking place anywhere in our business.

All of our business centres are located in the United Kingdom. We do not operate from any business centres overseas.

Upon recruitment all employees receive an induction with a senior company manager and the new starter is required to produce a passport and where appropriate a UK driving licence. New employees are also required to provide a P45 from their previous employer or else complete a P46 for tax purposes.

Salary payment is made direct to an employee through their personal bank account and never to a third party.

ETHICS POLICY

Williams Shipping Ethics Policy sets out the basis of the Group's relationship with customers, suppliers, staff and the law.

The main elements are:

1. Two-way loyalty of staff to management and management to staff
2. Commitment to quality service and a willingness to go the extra mile
3. Valuing of people: demonstrating care for the interests of customers and all who do work for Williams Shipping
4. Building enduring relationships with customers and suppliers through long term commitments
5. Honesty in communication with customers and all who do work for Williams Shipping
6. Compliance with all relevant laws, regulations and internal Williams Shipping Group policies

Williams Shipping's customers can expect Williams Shipping employees to do all within their power to meet their needs and exceed their expectations. Williams Shipping's customers can expect all Williams Shipping employees to deal honestly with them and not commit any crime at their behest. Williams Shipping's customers can expect Williams Shipping employees to work to create enduring and positive relationships with them.

People who undertake work for Williams Shipping do so cooperatively in a spirit of trust built on honest communication, professional conduct, fairness in business dealings and in full compliance with all laws and regulations. The Williams Shipping Group values highly the cultural diversity of all who undertake work for Williams Shipping and nurtures their willingness and capacity to work together to achieve common goals.

Williams Shipping employees ensure that workplace health and safety standards and practices are given priority and extend to all who undertake work for Williams Shipping. Williams Shipping managers support the honest efforts of all staff to improve themselves and make provision for training and professional development to ensure staff are appropriately equipped for the jobs they are required to do on behalf of customers.

Williams Shipping managers recognise that all who undertake work for Williams Shipping are connected to families and that the well-being of the family has an impact on their ability to work effectively.

Williams Shipping employees will neither attempt to use their standing as employees of Williams Shipping to derive a private business advantage for themselves, any associate or family member nor engage in any other activity which constitutes a conflict of interest between their private and professional roles.