



PROFESSIONAL CONSTRUCTION
STRATEGIES GROUP LIMITED

COMPANY
POLICY MANUAL
2020

V1 PRODUCED 19/11/2019

DOCUMENT CONTROL

Approvals Table

	Name	Role	Date
Authored By:	Joanne Hunt	Standards & Policies Editor	01/11/19
Reviewed By:	Ian Blackman	Director	11/11/19
Approved By:	Katherine Bew	Managing Director	19/11/19

Revision History

REVISION NO.	Status	Date	By Whom	Comment
V1	Approved	19/11/19	Katherine Bew	Document created from existing policies which have all been updated and are effective immediately.

Future Planned Revisions

As a minimum, all company policies will be reviewed and updated during the fourth quarter of each year.

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1 INTRODUCTION

This Company Policy Manual brings together all the policies of Professional Construction Strategies Group Limited (PCSG). Having all our policies in one document will help to make it easier to refer to multiple policies at once, to remind employees of all their obligations and the standards expected of them in relation to our policies and to communicate with our partners, suppliers and clients. All policies will be reviewed at least annually and updated to reflect regulations, legal and ethical best practice as well as continuous improvement.

ABOUT PCSG

Formed originally in 2000, PCSG is a niche SME consultancy business with bases in the UK and Australia and a branch office in Hong Kong.

With a background firmly based in the construction industry we operate in the public and private sectors both on the client side and the supply side with clients including HM Government and major blue chip companies.

We employ a team of dedicated specialists in the fields of leading edge built environment related digital technology, the design, construction and operation of built assets and holistic sustainability (financial, social and environmental).

We provide a diverse range of services geared towards delivering targeted improvements and building the short, medium- and long-term resilience of our clients' organisations. This includes, for example, working in partnership with clients to solve their business issues and create value through their information and data.

We also work with construction companies from the biggest companies to SME contractors to help them bid for and win major infrastructure and building projects. We are then often engaged to support the mobilisation of the projects they win.

Clients also engage us to support the delivery of innovative transformation and change programmes which often involves the development of new strategies, management systems, processes, tools and procedures including achieving certification to recognised industry standards.

OUR MISSION, VISION AND VALUES

Working internationally, our mission is to apply our expertise and unrivalled depth of experience in support of successful outcomes for our clients.

We are passionate about using our expert knowledge to help the organisations we work with to more effectively deliver, operate and optimise built assets and to deepen their understanding of how the built environment can sustainably meet the needs of the people it serves.

Whether we are providing advice and services, solutions, systems or data our end-goal is the same: To work collaboratively with our clients to achieve their objectives and ultimately to flourish in this fast-paced, highly competitive 21st century world.

We encapsulate this aim in our company vision of: **Infinitely Smarter Futures.**

Everything we do is guided and shaped by our values of **excellence, integrity, flexibility and partnership.** We aim to ensure our company policies reflect these strongly held values.

2 HEALTH & SAFETY POLICY

The health, safety, and well-being of our staff and associates is of primary importance to us.

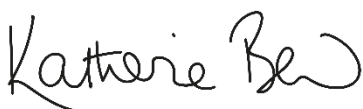
All our staff must understand that they are responsible for their own safety and be alert to safety issues or concerns for the people around them. The company's Health and Safety Policy is to ensure we support our staff in this by:

- ▶ Providing adequate control of the health and safety risks arising from our work activities.
- ▶ Consulting with our employees on matters affecting their health and safety.
- ▶ Ensuring the wellbeing of our staff and that they recognise their personal contribution is highly valued.
- ▶ Providing and maintaining safe equipment.
- ▶ Ensuring safe handling and use of substances.
- ▶ Providing information, instruction, and supervision for employees.
- ▶ Ensuring all employees are competent to do their tasks, and to give them adequate training.
- ▶ Preventing accidents and cases of work-related ill health.
- ▶ Maintaining safe and healthy working conditions.
- ▶ Making the necessary resources available to implement this policy.
- ▶ Being fully committed to the planning, regular review and development of this policy.

The implementation of this Health & Safety Policy is set out in our company Health & Safety Plan and it is the responsibility of the Directors to ensure it is adhered to.

A copy of the Health & Safety Plan is issued to each new member of staff and associates and is readily available on our company portal.

Signed:

A handwritten signature in black ink that reads 'Katherine Bew'.

*Katherine Bew, Managing Director
Professional Construction Strategies Group Ltd*

3 QUALITY POLICY

Excellence is one of PCSG's core values and the quality of our work is central to our success and resilience as a business.

Our objective is to satisfy our clients' requirements and to meet or exceed their expectations each and every time, whilst ensuring job satisfaction for our staff and associates.

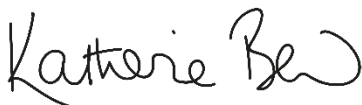
This Quality Policy outlines the fundamental principles against which PCSG operates and which will support our business objectives. This policy forms the basis for our Quality Management System and is binding on all staff, associates and subcontractors.

We are committed to ensuring that this policy and the requirements of ISO 9001 are understood and implemented by our staff safely, in line with legislation, regulations, and codes of practice. PCSG's Quality Policy is to:

- ▶ Apply the principles of our approach to quality management to all our activities
- ▶ Set measurable quality objectives and monitoring the quality of work of our staff, associates and subcontractors.
- ▶ Undertake management peer reviews of work and performance data, including client feedback and audits.
- ▶ Focus our efforts on ensuring that all clients are completely satisfied with the services we provide to them, seeking feedback to confirm their satisfaction with our work.
- ▶ Develop, document, and operate processes and objectives which will allow us to provide consistently high quality products and services.
- ▶ Invest in training our staff in areas which enhance the quality of our services.
- ▶ Monitor the performance of our processes and objectives through audits and peer reviews to provide a basis for their improvement.
- ▶ Ensure all employees are involved in the drive for excellence in our business, as we believe that the abilities, knowledge, and experience of our staff are our most valuable resource.
- ▶ Keep continuous improvement at the heart of our business and share Learning from Experience across the business.

We have established a Quality Management System which complies with the requirements of ISO 9001:2015 and provides a framework for measuring and improving our performance. Although the Managing Director has ultimate responsibility for Quality, all employees have a responsibility within their own areas of work to help ensure that Quality is embedded within the whole of the company.

Signed:

A handwritten signature in black ink that reads 'Katherine Bew'.

*Katherine Bew, Managing Director
Professional Construction Strategies Group Ltd*

4 ENVIRONMENTAL POLICY

PCSG is committed to protecting the environment, including prevention of pollution, and continually improving and developing our Environmental Management System to enhance the way we go about our business to minimise our environmental footprint and where possible enhance where we have been.

We conduct all activities in an environmentally responsible way and we actively encourage our clients, associates and subcontractors to do the same. We have identified the most significant environmental impacts of our activities to be carbon emissions from travel, waste, the supply chain, and our ability to influence our clients' environmental performance and this policy prioritises these aspects.

All staff and associates are made aware of the aims and objectives of our Environmental Management System and associated operating procedures. They are expected to adhere to its requirements and are encouraged to suggest ways in which these can be improved.

We are committed to delivering a positive environmental impact through five key action areas:

Smarter futures: We manage and promote positive environmentally related behaviours of our staff; for example, choices over modes of transport and remote attendance at meetings when appropriate.

We also inspire clients to develop their awareness and understanding of sustainability issues and increase engagement with sustainable business practices.

Carbon neutrality: We minimise our carbon footprint and identify ways to offset any remaining emissions.

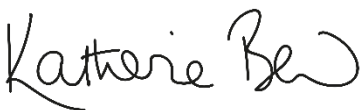
Minimal waste: At all of our offices we follow the established waste hierarchy within the premises and offer the building's management team suggestions for improvements when they are identified.

Sustainable procurement: We follow our Sustainable Procurement Code when making purchases to minimise our environmental impact.

Compliance with legal and other obligations: We identify relevant legal and other obligations related to our operations and confirm compliance through regular audits.

The Directors of PCSG are responsible for regularly reviewing and setting environmental objectives and targets to ensure proactive and ongoing development of our Environmental Policy and Management System.

Signed:

A handwritten signature in black ink that reads 'Katherine Bew'.

*Katherine Bew, Managing Director
Professional Construction Strategies Group Ltd*

5 EQUALITY & DIVERSITY POLICY

PCSG is committed to providing a working environment in which employees are able to realise their full potential and to contribute to its business success irrespective of their gender, race (including colour, nationality, ethnic or national origin), disability, sexual orientation, marital status, employment status, age, religion or belief, rehabilitation of offenders, and trade union membership. This is a key employment value to which all employees are expected to give their support.

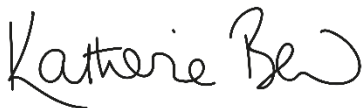
In order to create conditions in which this environment can be realised, we are committed to identifying and eliminating unlawful discriminatory practices, procedures and attitudes throughout the organisation. We expect employees to support this commitment and to assist in its realisation in all possible ways.

All allegations of unlawful discrimination or harassment will be treated seriously in accordance with the grievance procedure which is set out in the Staff and Associate Handbooks.

The Managing Director is responsible for overseeing and implementing this policy and monitoring and reviewing its operation.

Equality and Diversity practice is developing constantly as social attitudes and legislation change. We will keep this policy under review and will implement changes where these could improve equality of opportunity. This commitment applies to all our employment policies and procedures, not just those specifically connected with equal opportunities.

Signed:

A handwritten signature in black ink that reads 'Katherine Bew'.

*Katherine Bew, Managing Director
Professional Construction Strategies Group Ltd*

6 ETHICS, ANTI-BRIBERY AND COUNTER FRAUD POLICY

One of PCSG's core values is integrity and central to living this value is to uphold responsible and fair business practices. We are committed to promoting and maintaining the highest level of ethical standards in relation to all our business activities. Our reputation for maintaining lawful business practices is of paramount importance and this Policy is designed to preserve our values.

In keeping with our core values and to maintain excellent client and partner relationships, it is our policy that we:

- ▶ Operate with inherent transparency in all our operations.
- ▶ Hold early open discussions to address any issues that give any cause for ethical concern and take professional advice if we are unsure.
- ▶ Declare any conflicts of interest or, if any doubt exists, potential conflicts of interest as soon as they are identified.

We have a zero tolerance policy towards bribery, fraud and corruption and are committed to acting fairly and with integrity in all of our business dealings and relationships and implementing and enforcing effective systems to counter bribery and fraud.

This policy applies to all permanent and temporary employees (including any of our intermediaries, subsidiaries or associated companies).

This Policy also applies to any individual or corporate entity associated with PCSG or who performs functions in relation to, or for and on behalf of, PCSG, including, but not limited to, Directors, agency workers, casual workers, contractors, consultants, seconded staff, agents, suppliers and sponsors ("associated persons").

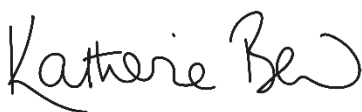
To meet our goals, we will:

- ▶ Comply with any anti-bribery and anti-corruption legislation that applies in any jurisdiction in any part of the world in which they might be expected to conduct business.
- ▶ Act honestly, responsibly and with integrity.
- ▶ Safeguard and uphold PCSG's core values by operating in an ethical, professional and lawful manner at all times.

PCSG's rules and procedures developed to counter fraud and bribery are detailed in PCSG's Terms of Employment, set out in the Staff and Associate Handbooks which are given to each new member of staff and associates. The Handbooks are also readily available on our company intranet.

The Managing Director is responsible for overseeing and implementing this policy. This policy will be reviewed annually to ensure that it is effective, consistently implemented and continually improved.

Signed:

A handwritten signature in black ink that reads 'Katherine Bew'.

*Katherine Bew, Managing Director
Professional Construction Strategies Group Ltd*

7 MODERN SLAVERY & HUMAN TRAFFICKING POLICY

PCSG is committed to ensuring that no staff or suppliers are exploited or mistreated especially with respect to modern slavery or human trafficking in any part of our business or supply chain.

This Policy statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place.

Employees are expected to report concerns and management are expected to act upon them.

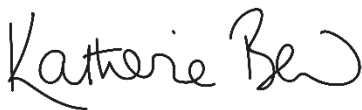
To achieve our objectives in this regard, PCSG's policy is that we will:

- ▶ Engage only with those who share our values and comply with the law.
- ▶ Undertake due diligence of potential partners/vendors to assess any risks. Where risks are identified we will verify that the vendor has compliant governance in place to manage the risks prior to appointment.
- ▶ Only permit our suppliers to sub-contract work with our approval to ensure this policy flows through our supply chain.
- ▶ Use UK based suppliers who align to our values to purchase office supplies and equipment.
- ▶ Monitor compliance of purchasing products in line with our Procurement Code Guidelines.
- ▶ Provide communication and training regarding this policy statement and the expected behaviours to our employees, vendors and suppliers.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.

The Directors are committed to ensuring that this policy is understood and adhered to by staff and associates. It will be reviewed annually to ensure it is effective and continually improved.

Signed:

A handwritten signature in black ink that reads 'Katherine Bew'.

*Katherine Bew, Managing Director
Professional Construction Strategies Group Ltd*

8 COMMUNICATIONS POLICY

This Communications Policy aims to ensure that content which is shared externally to the PCSG organisation using all channels including company websites, the Press, Yammer, Twitter, LinkedIn and Instagram is fit for purpose and consistent with the PCSG brand, policies and ethics. Examples of communications covered by this policy are website blogs, press releases, articles, and papers.

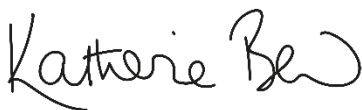
To achieve this objective, it is our policy that:

- ▶ Employees take due care when posting any information relating to PCSG. Postings should not disclose any information that is confidential or proprietary to the company or to any third party that has disclosed information to PCSG. They should seek guidance from their Line Manager or, if in doubt, a Director.
- ▶ Employees shall ensure all content is proof read and approved by a Director/Associate Director before it is published. Only official company postings may include the PCSG logo.
- ▶ Social media postings should not be defamatory or derogatory in any way of PCSG, its employees or clients. If employees comment on any aspect of the company's business, they should clearly identify themselves as a PCSG employee and include a disclaimer that the views are their own and not those of PCSG.
- ▶ Social media tools are fast moving and well-suited to tasks such as the live-blogging of events and it may not always be possible to find someone to double-check content. Employees must satisfy themselves that their posts are fit for purpose and do not have the potential to put employees or PCSG in a difficult position.
- ▶ Employees are legally responsible for their postings and may be liable if postings include confidential or copyrighted information belonging to third parties. All such postings are prohibited under this policy.

The policy applies to all employees (permanent and temporary) and any associates who have access to PCSG websites and social media.

The Directors of PCSG are committed to ensuring that this policy is understood and adhered to by staff and associates. It will be reviewed annually to ensure it is effective and continually improved.

Signed:

A handwritten signature in black ink that reads 'Katherine Bew'.

*Katherine Bew, Managing Director
Professional Construction Strategies Group Ltd*

9 ICT ACCEPTABLE USAGE POLICY

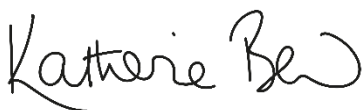
PCSG's ICT Acceptable Usage Policy is designed to protect the confidentiality, integrity and availability of our business information. It is also designed to protect the significant investment we make in Information & Communication Technology (ICT) by setting out what constitutes appropriate and authorised use of ICT systems.

This ICT Acceptable Usage Policy, which applies to all staff (permanent and temporary) and any associates that may need to use PCSG's ICT, is as follows:

- ▶ The ICT systems and internet shall not be used to store, display, generate and/or pass on to others any material that may be regarded as offensive, discriminatory and/or which is actually or potentially defamatory.
- ▶ PCSG reserves the right to monitor use of all company owned ICT by anyone without further notice.
- ▶ All ICT is primarily for business use. Limited personal use, including internet and email use, is only acceptable subject to the PCSG ICT rules as detailed in the PCSG Staff Handbook.
- ▶ All corporate data must be securely backed up.
- ▶ All ICT equipment remains the property of PCSG and must only be used by authorised users.
- ▶ All staff and associates must ensure ICT equipment is not put in danger of being damaged or stolen; any incidence of damage or theft must be reported immediately to the Line Manager or Director.
- ▶ All ICT equipment must be protected by a suitable password, in accordance with the PCSG ICT rules, that is periodically changed.
- ▶ ICT must not be used in a way that violates any laws or regulations.
- ▶ Email and other forms of electronic messages must be treated as business correspondence with the weight of a legal document, as they can be disclosable in the course of legal proceedings.
- ▶ ICT equipment must not be tampered with and all PCSG security measures must be complied with.
- ▶ Authorisation for new software installations is required from a PCSG Director.
- ▶ Intentional or negligent failure to follow this policy may lead to disciplinary or legal action being taken; in some cases, this may constitute gross misconduct.
- ▶ ICT services may be suspended, if necessary, to contain any system or network overload, or malware.
- ▶ Staff or associates using a client's ICT equipment must seek guidance on and adhere to the client's policy and procedures relating to the use of the equipment.

The Directors are committed to ensuring that this policy is understood and adhered to by staff and associates. The Technical Director is responsible for implementing this policy and for monitoring and reviewing its operation. This policy will be reviewed annually to ensure the management of ICT systems and equipment use is effective, consistently implemented, regularly reviewed, and continually improved.

Signed:

A handwritten signature in black ink that reads 'Katherine Bew'.

*Katherine Bew, Managing Director
Professional Construction Strategies Group Ltd*

10 INFORMATION SECURITY POLICY

PCSG is committed to managing its information assets in accordance with current legislation and best practice, by maintaining accreditation to Cyber Essentials and using the guidance provided in ISO 27001:2013.

It is acknowledged that information exists in many forms: it may be printed or written on paper, stored electronically, transmitted by post or using electronic means, shown on media, or spoken in conversation.

Appropriate protection is required for all forms of information to ensure business continuity and to avoid breaches of the law and statutory, regulatory and contractual obligations.

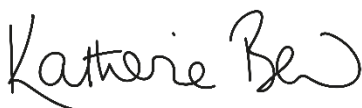
Our overarching policy is to treat information appropriately and in accordance with the risks associated with it. To achieve this, PCSG's Information Security Policy is:

- ▶ Provide a robust IT system where data is backed up, so that we continue to deliver our mission in the event of a failure of part of our IT system or the loss of the use of one of our offices.
- ▶ Maintain a PCSG ICT environment design, including firewall rules and approved exceptions, where changes to the design have a clear business case and are approved by the Technical Director prior to configuration changes being built, tested and implemented.
- ▶ Maintain a schedule of administration privileges which is subject to approval and periodic review by the Technical Director.
- ▶ Protect information from unauthorised access.
- ▶ Assure the confidentiality of information and maintain integrity of information.
- ▶ Make information available to authorised persons.
- ▶ Ensure we meet regulatory and legislative requirements.
- ▶ Produce, maintain and test business continuity plans.
- ▶ Ensure information security training is delivered to all staff.
- ▶ Ensure all breaches of information security, actual or suspected, are reported, investigated and satisfactorily resolved.

This policy applies to all employees and associates that use PCSG's ICT.

The Directors are committed to ensuring that this policy is understood and implemented by our staff safely, in line with legislation, regulations and codes of practice.

Signed:

A handwritten signature in black ink that reads 'Katherine Bew'.

*Katherine Bew, Managing Director
Professional Construction Strategies Group Ltd*