Anti-bribery and corruption Policy Statement

MacInnes Bros Ltd is committed to applying the highest standards of ethical conduct and integrity in its business activities. Every employee and individual acting on behalf of MacInnes Bros Ltd is responsible for conducting company business honestly and professionally.

MacInnes Bros Ltd considers that bribery and corruption has a detrimental impact on business by undermining good governance and distorting free markets.

MacInnes Bros Ltd does not tolerate any form of bribery by, or of, its employees or any persons or companies acting for it or on its behalf. The Managing Director and senior management are committed to implementing and enforcing effective systems to prevent, monitor and eliminate bribery, in accordance with the Bribery Act 2010.

Employees and others acting for or on behalf of MacInnes Bros Ltd are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments. As part of its anti-bribery measures, MacInnes Bros Ltd is committed to engage only in transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure.

A breach of company policy by an employee will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct and immediate dismissal. Employees and other individuals acting for MacInnes Bros Ltd should note that bribery is a criminal offence that may result in up to 10 years' imprisonment and/or an unlimited fine for the individual and an unlimited fine for MacInnes Bros Ltd.

The success of MacInnes Bros Ltd anti-bribery measures depends on everyone playing their part in helping to detect and eradicate bribery. Therefore, all employees and others acting for, or on behalf of, MacInnes Bros Ltd are encouraged to report any suspicious activity in confidence to the Managing Director who will support any individuals who make such a report in good faith.

Ewen P MacInnes
Managing Director
On behalf of MacInnes Bros Ltd
18th January 2021

(Review date 17/01/2022)

Business Continuity Plan

MacInnes Bros Ltd is a building and civil engineering contractors with its head office in Uachdar, Isle of Benbecula.

Fortunately, due to the nature of our business most of our works are external, and our work force is predominately mobile, there are systems in place on sites in the event of disruption.

Detailed below are the perceived risks to our business with details of how these will be managed.

Perceived Risk	Action to be taken
Premises – should relocation be necessary	We have office and storage containers at our disposal, and these would be located at the East Camp Trust site.
Loss of power	We have 2no standby generators to provide us with power.
Impact on communications – Loss of use of Phones & Computers	We have a BT mobile wi-fi hub with unlimited data which will work anywhere in Uist and allow us to use the office mobile and our computers. Our data is backed up daily and or server is administered by our IT consultants SFG Software Ltd. If use of a landline was necessary, there are spare office facilities within the East Camp site we could utilise.

We have insurance cover in place for alternative mobile premises in the event of disruption to our business; an alternative site has been sourced at East Camp, Balivanich, Isle of Benbecula.

The above procedures would ensure the continued operation of our business.

Ewen P MacInnes
Managing Director
On Behalf of MacInnes Bros Ltd
18th January 2021

(Review date 17th January 2022)

Child Labour Policy Statement

MacInnes Bros Ltd does not employ any person below the age of sixteen years at the workplace. MacInnes Bros Ltd prohibits the use of child labour and forced or compulsory labour at all its depots and those who supply or sub-contract for us. No employee is made to work against his/her will or work as bonded/forced labour, or subject to corporal punishment or coercion of any type related to work.

Children must not be involved in any part of MacInnes Bros Ltd supply chain and MacInnes Bros Ltd will not contract with any supplier who is actively using child labour.

Ewen P MacInnes
Managing Director
On behalf of MacInnes Bros Ltd
18th January 2021

(Review date 17/01/2022)

Commercial Social Responsibility Policy Statement

- Waste, rubbish & litter should not be allowed to accumulate. Dust operations should be managed to prevent any inconvenience to others.

- Damage caused by our Operations/Working Activities are be rectified quickly.

Consideration:

- Everyone affected by the Contract/Project should be advised before work starts.

- Nuisance caused by deliveries, traffic & parking should be minimised.

- Diversions should be clearly signed with special attention paid to the needs of the Local Community & those with sight, hearing & mobility difficulties.

Environment:

- The potential environmental & ecological effects of the Project & Working Operations should be identified & evaluated, with appropriate action taken to minimise all forms of pollution.

- Every effort should be made to reduce, reuse & recycle waste. Materials will be obtained from sustainable sources, & local resources used where possible.

- The Contract/Project should aim to make a positive contribution to the natural surrounding environment.

Good Neighbour:

- The Workforce will be encouraged to have a positive influence on the Local Community.

- The Contract/Project Agent/Manager is to interact proactively with local residents, businesses, schools, etc throughout the Contract/Project to inform them about Working Activities & to pre-empt & avoid complaints.

- Any complaint should be logged & handled positively to achieve a satisfactory outcome for all concerned.

Respectful:

- Everyone involved with the Contract/Project should help to create a positive image & maintain respectable & safe standards of dress & behaviour whilst at work.

- Improper conduct & language should be subject to severe disciplinary action.

- Pride in the management & appearance of the Contract/Project, its temporary facilities & the surrounding area should be shown at all times.

Responsible:

- The Workforce will be made aware of their obligations to personnel, to act in a professional & conscientious manner, & play a part in the development of the Companies future workforce & commitments/objectives.

Commercial Social Responsibility Policy Statement

Safety:

- Systems are to be in place so that Working Activities are carried out with due care & consideration for the safety of the public as well as for those visiting & working on the Contract/Project.
- No Working Activity should be a risk or hazard to others.
- All employees & staff have a "***Duty of Care***" to protect third parties & their properties from negligible/accidental damage or injury occurring.

We will also register & resolve any Client or Customer complaints in accordance with our standards of service.

We will also support & encourage our employees & business parties to help local community organisations & activities in our area, particularly our employee chosen charities.

MacInnes Bros Ltd are committed to working with local schools, colleges & training providers to assist young people in choosing their future careers, being an advocate for our industry.
MacInnes Bros Ltd operates an Equal Opportunities Policy for all present & potential future employees & will offer our employees clear & fair terms of employment & provide resources to enable their continual development & enhancement.

We shall also maintain a clear & fair employee remuneration policy & shall operate an open door policy for employee consultation & business involvement.

MacInnes Bros Ltd are committed to provide safeguards to ensure that all employees of whatever nationality, colour, race or religious belief are treated with respect & without prejudice, or sexual, physical & mental harassment in-line with the Modern Slavery & Human Act 2015.

We shall provide, & strive to maintain, a clean, healthy & safe working environment in line with our Health, Safety & Environmental Policy, combined with our Safe Systems of Work.

MacInnes Bros Ltd is conscious for the need to instigate & further develop Environmental Policies with achievable objectives, which may also include the incorporating of Local Biodiversity Action Planning as part of the business & operational cycle process, relating to our projected activities.

We also aim to mitigate our impact on the Natural & Historical Heritage found here in the Western Isles of Scotland. Thereby future generations can gain a better advancement in knowledge, experiences & a fundamental understanding of the local lifestyle & historical past of this unique island culture.

MacInnes Bros Ltd achievements have been recognised by a multitude of business supporting organisations & rewarded with such accreditations as:

SNIPF – Scottish & Northern Ireland Plumbing Employers' Federation; Licensed Business.
Constructionline – PPQ Approved; Reg No: 3626.
CHAS – Contractors Health & Safety Scheme; Reg No: 197464.
Achilles – UVDB Supplier; Reg No: 199049.

Ewen P MacInnes
Managing Director
On behalf of MacInnes Bros Ltd
18th January 2021

(Review date 17/01/2022)

Confidential Document Disposal Statement

MacInnes Bros Ltd currently has secure locked premises for storage of the above.

Document time scales are monitored and any documents selected for disposal are signed off by our Managing Director prior to disposal.

The documents are then put onto a pallet and shrink wrapped within our premises and transported to our Inverness Depot where they are collected by Ord Storage Services Ltd for disposal.

On completion we are issued a certificate from the supplier confirming the documents have been shredded.

Ewen P MacInnes
Managing Director
On behalf of MacInnes Bros Ltd
18th January 2021

(Review date 17/01/2022)

Critical Processes for Quality Contract Delivery

MacInnes Bros Ltd is committed to ensuring that the following processes are adhered to & also ensuring that we deliver a result on site that meets with the requirements & expectations. Our aim & overall objective is to ensure that we deliver a consistent level of quality throughout all operational processes Contracts/Projects. In order to do this the following Critical Processes are instigated & are to be adhered too:

Contract Review:

When the contract is awarded, management record & review the Contract Conditions to establish the Client's requirements & ensure conditions are adequately defined. Any variations to the Contract are documented & agreed prior to going on site to ensure that no ambiguity exists.

Planning the Contract:

MacInnes Bros Ltd will plan the resources that will apply to the Projects aims & objectives; labour, materials, tools & equipment.

A Programme of Works is then created with careful planning, this is a key issue, thereby ensuring that a quality result is delivered. Examples of this include:

- Ensuring that we have the correct personnel on site for that particular job by checking similar experience, training received etc. It is our aim to ensure that all personnel are trained & experienced to the extent necessary to undertake their assigned activities & responsibilities effectively.
- We actively recruit employees capable of meeting the technical, skill, experience & educational requirements of the company's activities. Full records are maintained of all training undertaken by employees.
- Ensuring that the materials required for the job are ordered timeously and are fit for purpose as specified, data sheets & testing certificates are obtained to ensure compliance with contract specifications.
- Ensuring that all equipment & tools are fit for purpose e.g calibration certificates, maintenance carried out on plant.

Information & Documentation on Site:

On commencement on site a copy of all current documentation goes to site. This will include, (but not be restricted to); Drawings, Specification, Variations, Site Instructions, Operating Procedures, Health & Safety Plan, Method Statements & Risk/COSHH Assessments.

Documentation Control:

The documentation must be controlled to ensure that the appropriate personnel as the correct & most up to date information. Revisions are issued & obsolete versions removed. The distribution of standard documents is controlled & recorded on Distribution Lists, which also indicate the current issue status. The Distribution Lists are reviewed & updated as & when changes occur.

All changes to documents are reviewed & approved by the person responsible for the original issue &, where appropriate, the nature of the change is indicated on the document. Master copies of the revised documents are retained as records of the changes & renewed as necessary to ensure clarity & conformity.

Each Contract/Project has a Portfolio which contains all relevant information. Information is also held on the Company's IT System for ease of access & manipulation.

Documenting events on site: This is achieved by checking this against the client's requirements & recording the results by means of:

Site Diary, Confirmation of Verbal/Written Instructions/Requests & Events is maintained, including communications with clients, sub contractor's, inspections, suppliers.

Site checklists detailing specific items to be inspected at appropriate stages are utilised & completed inspections.

Critical Processes for Quality Contract Delivery

Site reports are prepared, distributed, maintained, promulgated & retained.

Process Control:

All work is planned & undertaken in accordance with the Company's Policies & Procedures, The CDM 2015 & the Contract/Project Specification(s). Work instructions are issued. Project administration processes are carried out in accordance with the Contracts/Projects requirements; e.g: preparation of Plant & Labour Returns to the client or customer.

Supervision of Work on Site:

All work on site is supervised to ensure that the performance of work is to the industry, regulatory & client's requirements & specifications.

Receipt of materials:

All materials received on site are checked to ensure compliance with the specification, correct quantities & any signs of damage. All stores areas are maintained as secure as practical.

Non-Conformance Preventive & Corrective Action:

Any areas of non-conformance are identified & the extent of non-conformity is documented in order to establish trends & identify possible areas for improvement.

The corrective action required to prevent recurrence is evaluated, documented, & its effective implementation is monitored.

All rectification is subsequently re-inspected to ensure client satisfaction. All employees are encouraged to suggest improvements in methods, materials, suppliers, & sub-contractors.

Dealing with unsatisfactory work:

Notice is communicated to the appropriate person & corrective action taken.

Acting on findings:

Improving on how & what we do.
Assess, monitor & identify ways we can improve in these areas.
Revise systems & operations as required achieving the aims & objectives expected by all parties.

Completion and Handover:

Preparation for practical completion is carried out in accordance with the Contract/Project requirements. An inspection procedure for practical completion identified & communicated to the client & also applied on site.

Handover procedures identified & carried out in accordance with the client's specified requirements.

Management review:

Internal analysis reviews & audits are conducted to identify the key performance, suitability & effectiveness of the Critical Process Procedure(s) which will ultimately demonstrate our committed obligation to the Production Quality Effectiveness to both our clients & customers alike.

Ewen P MacInnes
Managing Director
On behalf of MacInnes Bros Ltd
18th January 2021

(Review date 17/01/2022)

Commercial Social Responsibility Policy Statement

MacInnes Bros Ltd recognises that we must integrate our business values & diverse operations to meet the expectations of our business parties; clients, customers, employees, suppliers, the local community and the environment.

MacInnes Bros Ltd also recognises that our social, economic & environmental responsibilities to these business parties, which is also an integral objective to our business core. We also aim to demonstrate these responsibilities through our actions & within our Company Policies.

MacInnes Bros Ltd takes seriously all feedback that we receive from our business parties &, where possible, maintain open dialogue to ensure that we fulfil the requirements outlined within the Policy.

We shall be open & honest in communicating our strategies, targets, performance & governance to our business parties, through our continual commitment to sustainable development.

The Managing Director of MacInnes Bros Ltd, Mr Ewen P MacInnes, is responsible for the implementation of the policy & will make the necessary resources available to realise our business responsibilities.

The responsibility for MacInnes Bros Ltd performance on this policy rests with all employees, & sub-contractors, throughout the Companies scope of business related aims & goals.

MacInnes Bros Ltd Business Aims & Focus:

We shall ensure a high level of business performance while minimising & effectively managing risk ensuring that we uphold the values of honesty, openness & fairness in our relationships with all our business parties.

We shall support the development of our external business parties through training courses & further personal development aims, by using our gained fundamental achievements for all our business associates to share in our developed skills, knowledge & varied experiences from past activities.

Our Contracts/Projects will clearly set out the agreed terms, conditions & the basis of our relationship & will operate in a way those safeguards against unfair business practices.

We shall encourage our business related suppliers & sub-contractors to adopt responsible business policies & practices in-line with our own formal procedures, these may consist of, (but not be restricted to):

Accountability:

- The Workforce are continually encouraged to promote the Companies aim of improving the image of all developments & infrastructure changes, combined with the construction activities & that of the Client's or Customer's potential aims & ultimate objectives.
- Everyone associated with the Contract/Project Planning & Execution should understand & comply with this "***Code of Conduct***".
- Training & further development needs for all employees' & staff participating in such activities & roles will be identified, assessed, addressed & implemented.

Appearance:

- The Development/Project should be aiming to create an image of which the Company can be proud.
- The Project/Works Perimeter & all Welfare Facilities should be clean, tidy & well presented, & all materials stored neatly.

Equality Action Plan

Mr Ewen P MacInnes, Managing Director, (or his Deputies/Appointed Person), is responsible for the Equality Policy & for putting the Equality Action Plan into practice.

We will circulate our Equality Policy & complaints procedure to all workers, their representatives, & will also display them on the Company Notice Boards, (where possible).

We will provide guidance for Managers, Supervisors & other relevant Staff on the Companies Equality Policy, & on their respective duties, combined with their responsibilities in relation the current Legislation & Regulations.

Our aim at MacInnes Bros Ltd is to employ a diverse workforce.

We will regularly review & revise the company's policies, practices & procedures, to ensure sure they are not discriminatory in any way, shape or form.

If people from a ethnic background are under-represented, we will endeavour to include a statement in our job advertisements, positively encouraging them to apply:

Consult with specialist Agencies such as Job Centre Plus, for advice & guidance.

Ensure the Company advertises jobs as widely as possible & by utilising a multitude of available communication assets & processes.

Ensuring that the criteria for selection are entirely job & employment related.

Monitor the ethnic backgrounds of all works, job applicants & use the information to improve opportunities at all levels in the Companies Structure & Diversity.

Our aim is to serve all members of the communities we work with & for. If people from some racial groups are under-represented among our customers, we will develop marketing & other strategies to reach them.

Ewen P MacInnes
Managing Director
On behalf of MacInnes Bros Ltd
18th January 2021

(Review date 17/01/2022)

Equality Policy Statement

The purpose of this Policy Statement is to ensure that equality for all workers, job applicants, clients & customers, irrespective of age, disabilities, race, religion & belief, sex, sexual orientation, pregnancy or gender reassignment meets with their expectations & approval

We value a diverse Client, Customer Base with the individuality & creativity that every worker potentially brings to the workforce, workplace or business operations.

Operating Principles:

Workers, job applicants, visitors, clients, customers will be treated fairly, openly & honestly, with dignity & due respect.

No job applicant or worker will receive less favourable treatment on the grounds of age, disabilities, race, religion & belief, sex, sexual orientation, pregnancy or gender reassignment.

Equality is about good employment practice & makes sound business sense.

Steps will be taken to make sure all business practices ensure equality.

Recruitment, training & appointment/promotion opportunities will be made as widely available as possible.

Selection criteria for employment, training & appointment/promotion opportunities will be entirely related to the job.

Employment decisions on recruitment, appointment/promotion & training will be made solely on the basis of merit.

Everyone has the right to work & do business in an environment free of unlawful discrimination & harassment. We will not tolerate such behaviour under any circumstances.

Disciplinary action, including dismissal, may be taken against any worker found responsible for harassment or discrimination.

Any worker or trainee who believes he or she is being discriminated against, victimised or harassed should raise the matter through the company's complaints procedure.

This policy is fully supported by Ewen P MacInnes & the Management Team. We will ensure that all our workers, customers and clients are aware of the policy, and that they understand that they are responsible for observing it.

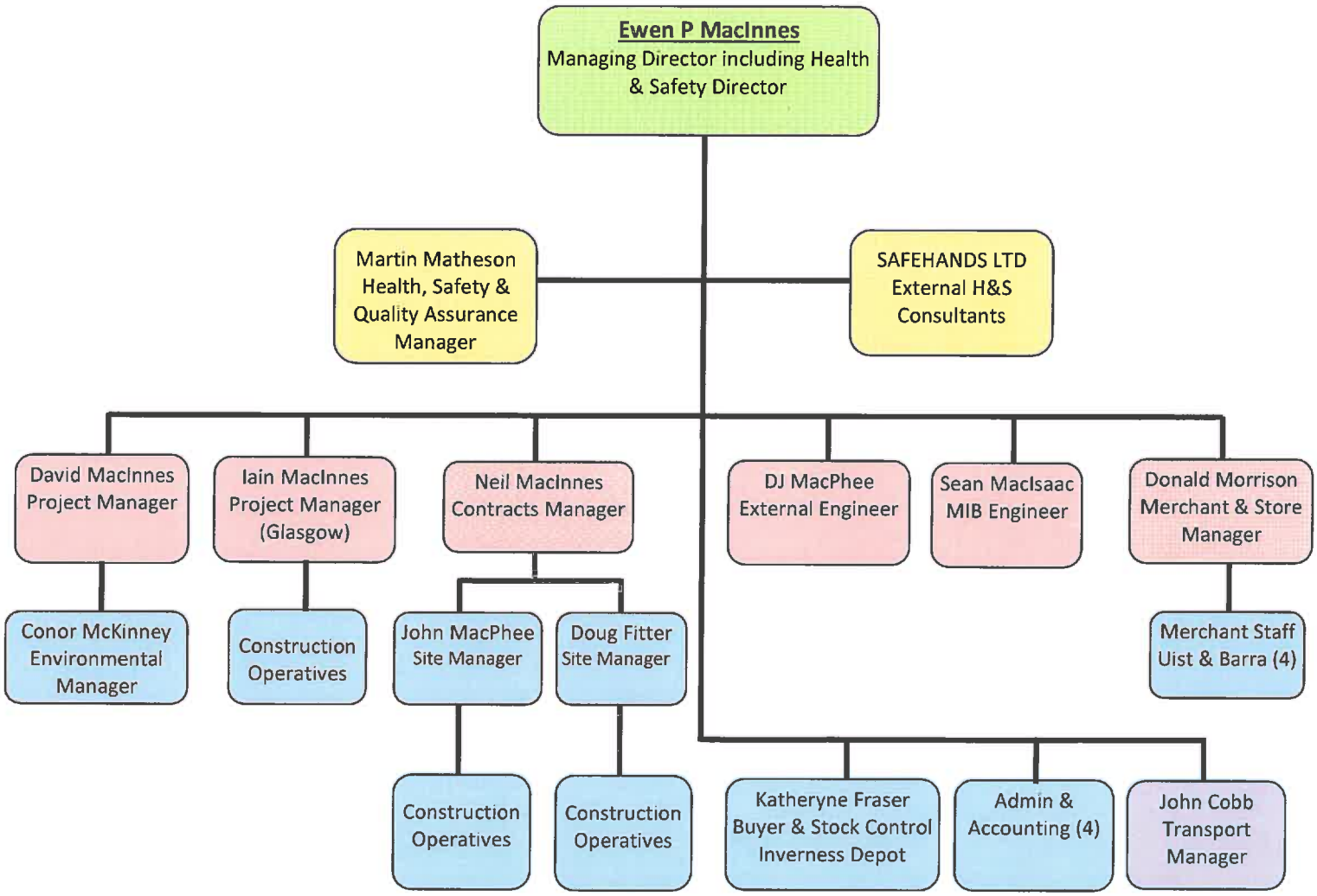
Our equal opportunities action plan outlines the steps we will take to give effect to this policy.

We will monitor the action plan & review the progress we have made each year, to make sure the policy is achieving its aims & ultimate objectives.

Ewen P MacInnes
Managing Director
On behalf of MacInnes Bros Ltd
18th January 2021

(Review date 17/01/2022)

MacInnes Bros Ltd
Organogram 2021



Ewen P MacInnes
Managing Director
On behalf of MacInnes Bros Ltd
18th January 2021
(Review date 17/01/2022)

Whistle Blowing Policy

MacInnes Bros Ltd have an internal procedure in place in order to professionally identify and act upon any misconduct within the company and to allow any concerns to be communicated in the greater interest of both personnel and the organisation.

MacInnes Bros Ltd welcomes and encourages the reporting of any concerns from all personnel within the company. Any concerns or suspicions regarding bullying/harassment, breach of safe working practices and any general misconduct within the working environment are encouraged to be brought to the attention of our Managing Director, Ewen P. MacInnes.

Any voicing of concerns to Ewen P. MacInnes will be treated with the utmost confidentiality and anonymity. We aim to achieve the highest possible standard of equality, honesty and transparency throughout the entire organisation. We believe this creates a healthy work culture and motivational workplace.

Ewen P. MacInnes has the overall responsibility for the wellbeing of all employees and will decide the best course of action to be taken.

Ewen P MacInnes
Managing Director
On behalf of MacInnes Bros Ltd
18th January 2021
(Review date 17th January 2022)