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## QUALITY POLICY

It is the policy of Navarre London Ltd to provide a reliable and efficient fitting out and refreshment service to its clients, whilst conforming to the company's long-term objectives, client requirements, and requisite statutory and safety regulations and to maintain client satisfaction at the highest economic level.

In order to achieve this, the company operates a Quality Management System, which includes measurable objectives that are reviewed on a regular basis. The company is committed to meeting all specified requirements and the continual improvement of the management system

Ultimate responsibility for the operation of this quality management system rests with the Managing Director.

The Quality Management System ensures that the company can fulfill contractual obligations by;

- Ensuring that all activities that directly affect the quality of service are carried out under controlled conditions.
- Continuous monitoring and analysis of quality indicators, which provide the feedback to enable quality improvement against client needs and expectations.
- Providing up to date instructions and training to all personnel together with the promotion of quality awareness.
- Undertaking all activities in line with the ISO 9001:2015 (QMS) standard.

The Managing Director ensures that this policy is communicated, understood and implemented at all levels in the organisation.

**Managing Director**  
**Gary Fox**



**Date: 01/01/2021**

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## TRAINING POLICY

### Statement

We are committed to ensuring that all our staff has received adequate training in order to be able to carry out their duties safely and without risk to themselves or others.

We aim to achieve this by providing induction training for all new employees and on-going skills training. The need for training will be determined by the requirements of the individual employee's job role.

We also constantly assess and review the development needs of our employees and actively encourage all staff, regardless of employment status, language skills and grade, to take advantage of all training opportunities available and to communicate their individual needs and requirements.

### Procedures

The following procedures describe the steps that we will take to comply with our obligations to provide adequate training:

All new employees will receive induction training. This training includes Health and Safety, Quality and Environmental management and covers key areas such as fire safety, deliveries and refuse removal, first aid, welfare and any workplace hazards. A signature will be required from the employee to confirm that they have understood the contents. A copy of this form will be kept on their personnel file.

This training will also be provided to other groups who will be working on our premises or on client sites. A Risk Assessment will be used to determine whether any training is necessary in order to carry out the job role safely. Other training needs will be identified by using one, or a mixture of, the following tools and is dependent upon the specific needs of the individual, team or client: -

- Performance Appraisals
- Employee questionnaires
- Key Performance Indicators (KPI)
- Where an employee's job involves the operation of tools or machinery, on-the-job training will be provided by the Site or Area Supervisor. It is the responsibility of the employee's manager to ensure that this is carried out. This training will also be given if an employee changes jobs
- If new machinery or equipment is purchased, further training is likely to become necessary.

In the event of training being required, Staff are expected to find the most cost-effective training available. All reasonable expenses, such as travelling will be reimbursed.

Employees are expected to cooperate with us fully with regard to attending health and safety training courses. We expect that all reasonable effort will be made to attend a course, but if this isn't possible, that we will be notified well in advance.

**Gary Fox**  
**Managing Director**



**01/01/2021**

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## OCCUPATIONAL HEALTH & SAFETY POLICY

Whilst providing a reliable and efficient fitting out and refurbishment service to its Clients, it is the policy of Navarre London Limited to ensure, so far as is reasonably practicable, the health, safety and welfare of its employees and the health and safety of other persons who may be affected by its activities. Navarre London Limited will take steps to ensure that its statutory duties are met at all times.

In order to achieve and maintain an effective Occupational Health & Safety Management System the Company has established measurable objectives that are reviewed at least on an annual basis,

**The Board of Directors, in order to ensure the effective application of health and safety within Navarre London will:**

1. Ensure that they have an understanding of the application of the Health and Safety at Work, etc Act 1974 and other legislation relevant to Navarre London business;
2. Review Navarre London health and safety performance regularly;
3. Be committed to the prevention of injury and ill health;
4. Be committed to the continual improvement of Navarre's Occupational Health & Safety performance;
5. Ensure that management systems provide effective monitoring and reporting procedures;
6. Be kept informed about significant health and safety failures and of the outcome of the investigations into their causes;
7. Ensure that implications in respect of health and safety are addressed in all business decisions;
8. Ensure that risk management systems for health and safety are in place and effective;
9. Ensure this policy is communicated to every employee working under the control of Navarre, with the intention of making them aware of their individual obligations when it comes to Health & Safety;
10. Liaise with the person(s) appointed for health and safety over the full range of his or her individual responsibilities;
11. Ensure that managers and staff are given adequate training in health and safety matters to competently discharge their responsibilities.
12. Make available adequate resources and financial provision for putting the health and safety policy into effect;
13. Undertake all activities in line with the ISO 45001 (H&S) standard.

**Employees must ensure that they:**

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

**Managing Director**  
**Gary Fox**



**Date: 01/01/2021**

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## Information Security Policy

Navarre London Ltd acknowledges the importance of ensuring information security is maintained at the highest economical level.

The objective of our information security management system is to ensure business continuity and to minimise the risk of damage by preventing security incidents and reducing the potential impact of any incident taking into account all legal and regulatory requirements and any contractual requirements.

It is our policy to: -

- Protect all of our informational assets (*including data stored on computers, transmitted over networks, printed or written on paper, stored on disks, tapes or other storage media and discussed during telephone conversations*) against all internal, external, deliberate or accidental threats.

Our Information Security Management System ensure that

- All information security risks are identified and their significance evaluated against defined criteria, which are then related to the establishment of information security objectives which are reviewed by senior management on a regular basis.
- Information will be protected against unauthorised access
- Confidentiality of information will be assured
- Integrity of information will be maintained
- Availability of information for business processes will be maintained
- Legislative, regulatory and contractual requirements related to information security will be met
- Business continuity plans are available and tested.
- Information security training will be carried out for all employees having access to such information.
- We undertake all activities in line with the ISO 27001:2013 (ISMS) standard.

**Managing Director**  
**Gary Fox**



**Dated: 01/01/2021**

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## ENVIRONMENTAL POLICY

Navarre London Ltd acknowledges the importance of supplying a building and office refurbishment service of a consistent and high standard within an environmentally sound framework. Within this framework we have a clear commitment for the protection of the environment which includes the prevention of pollution at all operational levels.

It is our policy to: -

- Minimise waste, and consumption of resources (materials, fuel, water and energy) and ensure that unavoidable waste is, where possible, recycled or disposed of responsibly.
- Foster a sense of responsibility for the environment amongst employees by the provision of information and training.
- Assess, monitor, and where possible reduce the impact of our activities on the local and general environment.
- Take account of the environmental impact of all raw materials, packaging and processes and wherever possible take steps to minimize this through strategic evaluation and planning.
- Maintain and monitor environmental objectives and targets; identify deviations from the stated policy and implement appropriate corrective action.
- Maintain effective systems to prevent pollution.
- Advise customers and other interested parties where appropriate on the best environmental practices associated with the delivery of our services.
- Ensure that all members of staff and our suppliers act in accordance with this policy and our Environmental Management System.
- Strive to continually improve our environmental performance and prevent pollution.
- Comply with all relevant Environmental Legislation and other requirements to which the company subscribes.
- Undertake all activities in line with ISO 14001:2015 (EMS) standard.

**Managing Director**  
**Gary Fox**



**Dated: 01/01/2021**

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# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

## **Policy Statement**

Navarre London Limited has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015.

The Company also expects the same high standards from all its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery and expects that its suppliers will in turn hold their own suppliers to the same standards.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment.

The Company accepts that it has a responsibility through practical and reasonable due diligence processes to ensure that workers are not being exploited, that they are safe, and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

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

## **Responsibility for the policy**

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

Line managers are responsible for ensuring that those reporting to them understand and comply with this policy.

## **Compliance**

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains, whether in the UK or abroad, is the

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responsibility of all those working for the Company or under the Company's control. You are required to avoid any activity that might lead to a breach of this policy.

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

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

### **Training and communication**

Initial issue upon employment as well as regular toolbox talks on this policy, and on the risk that the business faces from modern slavery in its supply chains, will be provided to staff as necessary, so that staff know how to identify exploitation and modern slavery and how to report suspected cases.

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

### **Breach of the policy**

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

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

**Managing Director**  
**Gary Fox**



**Date: 01/01/2021**