

Ethical and Legal Policies

GLOBAL IMPLEMENTATION



WaveTel ApS

www.wavetel.net

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Corporate and Social Responsibility Policy

Corporate

We recognize the importance of the part we play in matching talented people to exciting vacancies in successful, flourishing organizations. We never lose sight of the fact that our achievements are based on the success of our clients and candidates.

We are proud to have a European team of talented employees who are passionate for success, who comply with the highest standards of moral conduct that we set, and who embrace the challenge of making us the best in the business. We ensure that they are generously rewarded, highly stimulated and their personal goals and ambitions are achieved. In return our corporate objectives are realized.

Our culture is one of professionalism, achievement, friendliness, care and understanding, motivation, and ambition, which are of utmost importance to ensure our continued growth and success.

Social

As a professional recruitment services and solutions company, we recognize the important role we play in working with our clients to ensure that vacancies are appropriately filled and our candidates to secure continuity of employment, and the resultant positive impact this has on society. We offer choices to both parties and understand that the ultimate decision rests with them.

We welcome the increasing focus on a healthy work-life balance, and accept our responsibility in ensuring that our candidates and clients achieve success through a harmonious and diverse working environment by recruiting the right people and finding the right jobs.

Ethical Policy

As an international organization operating in several different countries, WAVETEL ApS recognizes that local knowledge is key to the success of integrating well into the local culture and environment. We therefore respect and comply with all local laws. As an equal opportunities employer, we ensure that the principle of Equal Opportunities is applied when working with clients and candidates, both contract and permanent. Please read our Equal

Professional Conduct Policy

WAVETEL ApS is determined to continue providing only the highest standards of service that our clients, candidates and employees have all come to expect from us. Our clients are innovative organizations with exacting requirements, and we are proud of our success in providing first-class candidates and solutions to meet their evolving recruitment and resourcing needs. With our team of dedicated and highly experienced professionals, we work in partnership with our clients to provide comprehensive, effective recruitment solutions. As a long-standing member of the Recruitment and Employment Confederation, we are proud to abide by the following Standards of Professional Conduct:

- We maintain high standards in everything that we do. We act fairly, honestly and courteously at all times, and do not engage in any activities, which would bring the recruitment industry into disrepute.
- We ensure that we continuously update our professional knowledge in relation to recruitment and commit to the requisite levels of continuous professional development per year.
- We seek to provide the best possible recruitment solutions to the identified needs of our clients at all times and do all that is reasonably practicable to achieve this.
- We seek to provide the best possible recruitment solutions to the identified needs of our candidates at all times and do all that is reasonably practicable to achieve this.
- We always comply with legislation and regulation as it affects the process of recruitment and do not assist or act in collusion with clients to knowingly circumvent the law or standards of ethical recruitment practice in any way.
- We act at all times with integrity, honesty and due diligence and behave in a manner that is appropriate and that should be reasonably expected of recruitment professionals.
- We promote at all times fair recruitment practices that are in accordance with all anti-discrimination law and that is in place in each of the countries in which we operate.
- We respect confidentiality at all times in relation to clients, candidates and staff.
- We exercise due diligence and high standards of timeliness, accuracy of information and advice given to both clients and candidates.
- We do not undertake tasks that are outside our personal levels of skills, competence and qualifications.

The above is a non-exhaustive list of the standards that we uphold. It is intended to provide a framework and a foundation upon which professionalism and quality of service can be built.

Anti-Bribery Policy

Introduction

One of our core values 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 of our business activities. Our reputation for maintaining lawful business practices is of paramount importance and this policy is designed to preserve these values. We therefore have a zero tolerance policy towards bribery 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.

Purpose and Scope of Policy

This policy sets out our position on any form of bribery and corruption and provides guidelines aimed at:

- ensuring compliance with anti-bribery laws, rules and regulations, not just within the DK but in any other country within which we may carry out our business or in relation to which our business may be connected;
- enabling you and persons associated with us to understand the risks associated with bribery and to encourage you to be vigilant and effectively recognize, prevent and report any wrongdoing, whether by yourself or others;
- Providing suitable and secure reporting and communication channels and ensuring that any information that is reported is properly and effectively dealt with;
- creating and maintaining a rigorous and effective framework for dealing with any suspected

instances of bribery or corruption.

This policy applies to all of our permanent and temporary employees (including any who may work for any intermediaries, subsidiaries or associated companies). It also applies to any individual or corporate entity associated with us or who performs functions in relation to, or for and on behalf of, us, including, but not limited to, directors, agency workers, casual workers, contractors, consultants, seconded staff, agents, suppliers and sponsors ("associated persons"). You and all associated persons are expected to adhere to the principles set out in this policy.

Legal Obligations

The Denmark legislation on which this policy is based is the Bribery Act 2010 and it applies to our conduct both in the Denmark and abroad. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

It is an offence in the Denmark to:

- offer, promise or give a financial or other advantage to another person (i.e. bribe a person), whether within the DK or abroad, with the intention of inducing or rewarding improper conduct;

- request, agree to receive or accept a financial or other advantage (i.e. receive a bribe) for or in relation to improper conduct;
- bribe a foreign public official.

You can be held personally liable for any such offence.

It is also an offence in the Denmark for you or an associated person to bribe another person in the course of doing business intending either to obtain or retain business, or to obtain or retain an advantage in the conduct of business, for us. We can be liable for this offence where we have failed to prevent such bribery by associated persons. As well as an unlimited fine, we could suffer substantial reputational damage.

Policy Statement

You and all associated persons are required to:

- comply with any anti-bribery and anti-corruption legislation that applies in any jurisdiction in any part of the world in which you might be expected to conduct business;
- act honestly, responsibly and with integrity;
- safeguard and uphold our core values by operating in an ethical, professional and lawful manner at all times.

Bribery of any kind is strictly prohibited. Under no circumstances should any provision be made, money set aside or accounts created for the purposes of facilitating the payment or receipt of a bribe.

We recognize that industry practices may vary from country to country or from culture to culture. What is considered unacceptable in one place may be normal or usual practice in another. Nevertheless, a strict adherence to the guidelines set out in this policy is expected of all employees and associated persons at all times. If you are in any doubt as to what might amount to bribery or what might constitute a breach of this policy, then please refer the matter to your line manager or Line Director.

For our rules and procedures in relation to the receipt of business gifts from third parties and corporate hospitality offered to or received from third parties, please refer to our Gifts from Clients/Suppliers Policy. It forms part of our zero tolerance policy towards bribery and it should be read in conjunction with this policy.

The giving of business gifts to clients, customers, contractors and suppliers is not prohibited provided the following requirements are met:

the gift is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision

- or retention of business or a business advantage;
- it complies with local laws;
- it is given in our name, not in the giver's personal name;
- it does not include cash or a cash equivalent (such as gift vouchers);
- it is of an appropriate and reasonable type and value and given at an appropriate time;
- it is given openly, not secretly;
- it is approved in advance by a Director.

In summary, it is not acceptable to give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given, or to accept a payment, gift or hospitality from a third party that you know or suspect is offered or provided with the expectation that it will obtain a business advantage for them.

Any payment or gift to a public official or other person to secure or accelerate the prompt or proper performance of a routine government procedure or process, otherwise known as a "facilitation payment", is also strictly prohibited. Facilitation payments are not commonly paid in the DK but they are common in some other jurisdictions.

Responsibilities and Reporting Procedure

It is the contractual duty and responsibility of all employees and associated persons to take whatever reasonable steps are necessary to ensure compliance with this policy and to prevent, detect and report any suspected bribery or corruption in accordance with the procedure set out in our Whistleblowing Policy. You must immediately disclose to a Director any knowledge or suspicion you may have that you, or any other employee or associated person, has plans to offer, promise or give a bribe or to request, agree to receive or accept a bribe in connection with our business. For the avoidance of doubt, this includes reporting your own wrongdoing. The duty to prevent, detect and report any incident of bribery and any potential risks rests not only with our Directors but equally to all employees and associated persons.

We encourage all employees and associated persons to be vigilant and to report any unlawful conduct, suspicions or concerns promptly and without undue delay so that investigation may proceed and any action can be taken expeditiously. In the event that you wish to report an instance or suspected instance of bribery, you should follow the steps set out in our Whistleblowing Policy. Confidentiality will be maintained during the investigation to the extent that this is practical and appropriate in the circumstances. We are committed to taking appropriate action against bribery and corruption.

This could include either reporting the matter to an appropriate external government department, regulatory agency or the police and/or taking internal disciplinary action against relevant employees and/or terminating contracts with associated persons.

We will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are also committed to ensuring nobody suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or corruption offence has taken place or may take place in the future.

Sanctions for Breach

A breach of any of the provisions of this policy will constitute a disciplinary offence and will be dealt with in accordance with our Disciplinary Procedure. Depending on the gravity of the offence, it may be treated as gross misconduct and could render you liable to summary dismissal.

As far as associated persons are concerned, a breach of this policy could lead to the suspension or termination of any relevant contract, subcontract or other agreement.

Guidance for the Group Accountant

All accounts, receipts, invoices and other documents and records relating to dealings with third parties must be prepared and maintained with strict accuracy and completeness. No accounts must be kept “off the record” to facilitate or conceal improper payments.

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Guidance for Line Managers / Line Directors

As a line manager, it is your responsibility to ensure that your staff comply with this policy. You are responsible for monitoring its effectiveness and should immediately report any risk of breach wrongdoing to a Director in this regard to the Directors who have overall responsibility for ensuring this policy complies with our legal and ethical obligations. We will review its contents on a regular basis.

Privacy Policy

WAVETEL APS is respecting the Data Protection Act 1998, and are currently in process of implementing the new GDPR Legislation, in order to be GDPR compliant in March 2018 We are committed to preserving and protecting the personal information that you have provided to us. Please read the following privacy policy to understand how we use and protect the information that you provide to us.

By registering on our website, you consent to the collection, use and transfer of your information under the terms of this policy.

Information That We Collect From You

When you visit and register on our website you may be asked to provide certain information about yourself including registration data (your name, address, email address, phone number, title etc) and your CV. We may also collect information about your usage of our website as well as information about you from messages you post to the website and email or letters you send to us.

The information that we collect from you is to enable us to assist you in finding the position that most suits you. As an Employment Agency and Employment Business we may record and store notes of any telephone calls or other written correspondence you have with our staff within our candidate management system for record keeping and quality control purposes. We are also required to take up references from previous employers or clients.

Disclosure of Your Information

Where necessary we may pass data to third parties that help us to process data and to prospective or intended employers or customers for the purposes of recruitment. Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

Security and Data Retention

We employ security measures to protect your information from access by unauthorised persons and against unlawful processing, accidental loss, destruction and damage. We will retain your information for a reasonable period or as long as the law requires.

Accessing and Updating

You are entitled to see the information held about you and may ask us to make any necessary changes to ensure that it is accurate and kept up to date. If you wish to do this, please contact us. We are entitled by law to charge a fee of DKK 200 to meet our costs in providing you with details of the information we hold about you.

Changes to Our Privacy Policy

Any changes to our privacy policy in the future will be posted to the site and, where appropriate, through email notification.

Contact

All comments, queries and requests relating to our use of your information are welcomed and should be emailed to info@wavetel.net

Equal Opportunities Policy

The Company has no political or religious bias.

We are an equal opportunities employer. As such we are determined that no job applicant or employee will receive less favorable treatment because of a protected characteristic ('unlawful grounds'). The protected characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including color, nationality and ethnic or national origins), religion or belief, sex or sexual orientation. We are opposed to all forms of unlawful and unfair discrimination and recognize that the provision of equal opportunities in the workplace will help all employees to develop to their full potential and as such the talents and resources of all employees will be fully utilized to maximize the efficiency and performance of the Company.

All full-time and part-time employees and job applicants, whether permanent, temporary, casual, part-time, on fixed-term contracts and/or members of trade unions, will be treated fairly. This policy also applies to ex-employees, to job applicants and to individuals such as agency staff, consultants and volunteers who may not be our employees, but who nonetheless work at, or are engaged by, the Company.

This policy applies to recruitment and selection for employment, training, career development and promotion, which will be solely on the basis of aptitude and ability. This policy also applies to conditions of service, pay and benefits, grievance and disciplinary procedures and termination of employment, including selection for redundancy.

We will take appropriate steps to accommodate the requirements of workers' religions, cultures and domestic responsibilities. Our policies on parental rights and flexible working should be consulted for specific guidance on our approach to these issues and your entitlements.

We, as a company, will adopt the same approach when working with clients and candidates, both contract and permanent, and ensure that the principle of equal opportunities is applied in every case.

We will also take all reasonable steps to provide a work environment in which all workers are treated with respect and dignity and that is free from harassment and bullying based upon age, disability, gender reassignment, race (including color, nationality and ethnic or national origins), religion or belief, sex or sexual orientation. These are known as the "anti-harassment protected characteristics". You are responsible for conducting yourself in accordance with this policy. We will not condone or tolerate any form of harassment, whether engaged in by workers or by outside third parties who do business with us, such as clients, candidates, contractors and suppliers.

You have a duty to cooperate with us to make sure that this policy is effective in ensuring equal opportunities and in preventing discrimination, harassment or bullying. Action will be taken under our Disciplinary Policy against any employee who is found to have committed an act of improper or unlawful discrimination, harassment, bullying or intimidation. Serious breaches of this policy will be treated as potential gross misconduct and could render the employee liable to summary dismissal.

You should also bear in mind that you can be held personally liable for any act of unlawful discrimination or harassment. You may also be guilty of a criminal offence if you commit serious acts of harassment.

You should draw the attention of your line manager to suspected discriminatory acts or practices or suspected cases of harassment or bullying. You must not victimize or retaliate against a colleague who has made allegations or complaints of discrimination or harassment or who has provided information about such discrimination or harassment. Such behavior will be treated as potential gross misconduct in accordance with our Disciplinary Policy. You should also bear in mind that you can be held personally liable for any act of unlawful discrimination or harassment. You may also be guilty of a criminal offence if you commit serious acts of harassment.

You should draw the attention of your line manager to suspected discriminatory acts or practices or suspected cases of harassment or bullying. You must not victimize or retaliate against a colleague who has made allegations or complaints of discrimination or harassment or who has provided information about such discrimination or harassment. Such behavior will be treated as potential gross misconduct in accordance with our Disciplinary Policy. You should support colleagues who suffer such treatment and are making a complaint. In addition, line managers who had knowledge that such discrimination or harassment had occurred in their departments but who had taken no action to eliminate it will also be subject to disciplinary action under our Disciplinary Policy.

We will also take appropriate action against any third parties who are found to have committed an act of improper or unlawful harassment against our workers.

We will always take a strict approach to serious breaches of this policy.

Direct Discrimination

Direct discrimination occurs when, because of one of the protected characteristics, a job applicant or worker is treated less favorably than other job applicants or workers are or would be treated.

The treatment will also amount to direct discrimination if it is based on the protected characteristic of a third party with whom the job applicant or worker is associated.

In addition, it can include cases where it is perceived that a job applicant or worker has a particular protected characteristic when in fact they do not.

We will take all reasonable steps to eliminate direct discrimination in all aspects of employment.

Indirect Discrimination

Indirect discrimination can occur when there is a condition, rule, policy or even a practice that applies to everyone but particularly disadvantages people who share a protected characteristic.

We will take all reasonable steps to eliminate indirect discrimination in all aspects of employment.

Anti-Bullying and Harassment in the Workplace

We are committed to ensuring that you work in a safe and productive environment and that the workplace is happy and healthy.

This policy also covers bullying and harassment in any work-related setting outside the workplace, for example, during business trips and at workrelated social events.

Harassment is any unwanted conduct related to an anti-harassment protected characteristic, and the conduct has the purpose or effect of violating the other person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that other person. A worker also harasses another person if they engage in unwanted conduct of a sexual nature, and the conduct has the purpose or effect of violating the other person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that other person.

Finally, a worker harasses another worker if they or a third party engage in unwanted conduct of a sexual nature or related to gender reassignment or sex, the conduct has the purpose or effect of violating the other worker's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that other worker, and because of that other worker's rejection of or submission to the conduct, they treat that other worker less favourably than they would treat them if they had not rejected, or submitted to, the conduct. Harassment takes the form of behavior that a reasonable person would realize would be likely to offend someone without the need for that person having to make it clear that such behavior is unacceptable; for example, touching someone in a sexual way. With other forms of behavior, it may not always be clear in advance that it will offend a particular person, for example, office banter and jokes. In these cases, the behavior will constitute harassment if the conduct continues after the person has made it clear, by words or conduct, that such behavior is unacceptable to him or her. A single incident can amount to harassment if it is sufficiently serious. All staff should consider whether their actions could be offensive to others.

Bullying and harassment may be verbal, non-verbal, written or physical. Examples of unacceptable behavior include, but are not limited to, the following:

- unwanted physical contact, ranging from touching or brushing against another person's body to assault or coercing sexual relations;
- unwelcome sexual advances, propositions or pressure for sexual activity;
- continued suggestions for social activity in or outside the workplace after it has been made clear that such suggestions are unwelcome;
- subjection to obscene or other sexually suggestive or racist comments or gestures, or other derogatory comments or gestures related to an anti-harassment protected characteristic;
- offensive or intimidating comments;
- questions about a worker's sex life;
- the use of nick names related to an anti-harassment protected characteristic;
- suggestions that sexual favors may further an employee's career or refusal of sexual favors may hinder it;

- the display of pictures, objects or written materials that may be considered pornographic or offensive to particular ethnic or religious groups;
- conduct that denigrates or ridicules a worker because of an anti-harassment protected characteristic including abuse or insults about appearance or dress;
- insensitive jokes or pranks;
- shunning a worker, for example, by deliberately excluding him or her from social activities or relevant work-related matters because of an antiharassment protected characteristic.

The list is not exhaustive and other behaviour may also constitute harassment.

The unwanted conduct will still amount to harassment if it is based on the anti-harassment protected characteristic of a third party with whom the worker is associated and not on the worker's own anti-harassment protected characteristic, or if it was directed at someone other than the worker, or even at nobody in particular, but they witnessed it. In addition, harassment can include cases where the unwanted conduct occurs because it is perceived that a worker has a particular anti-harassment protected characteristic, when in fact they do not.

Conduct may be harassment whether or not the person intended to offend. Something intended as a "joke" or as "office banter" may offend another person. This is because different people find different levels of behavior acceptable and everyone has the right to decide for themselves what behavior they find acceptable to them.

Bullying is offensive, intimidating, malicious or insulting behavior, an abuse or misuse of power that undermines, humiliates, denigrates or injures a colleague. Bullying does not include legitimate and constructive criticism of your performance or behavior, an occasionally raised voice, or an argument.

Examples of bullying include ridiculing or demeaning others, particularly junior colleagues, overbearing supervision and unjustifiably excluding colleagues from meetings/communications.

It is important that if you have a complaint regarding bullying or harassment that this is raised with us in order that it can be dealt with as quickly as possible to avoid any further distress caused by such behavior. You should raise the matter through our Grievance Policy.

As a general principle, the decision to progress a complaint rests with you. However, as your employer we have a duty to protect all workers and we may pursue a complaint independently if we consider it is appropriate to do so in all the circumstances.

We consider bullying and harassment in the workplace unacceptable. If it is found that such behavior is occurring, then this will be dealt with as a disciplinary matter, and will be subject to our Disciplinary Policy.

Workers who, in good faith, make complaints of bullying and harassment will be protected from intimidation or victimization in connection with their involvement. If you have been subjected to any such intimidation or victimization, you may raise a complaint in writing under the grievance procedure. Workers who, after investigation, are found to have given information falsely and in bad faith will however be subject to action under the Disciplinary Policy.

Dignity at Work

You should not have to suffer from any act, omission or conduct that causes you to be alarmed or distressed. This includes, but is not limited to, abusive, offensive, malicious, insulting or intimidating behaviour; repeated unjustified criticism; punishment imposed without reasonable justification; or detrimental changes in your duties or responsibilities without reasonable notice and explanation.

Any conduct on unlawful grounds affecting your dignity, including the conduct of superiors and colleagues, is unacceptable if:

- such conduct is unwanted, unreasonable and offensive to you;
- if your rejection or submission to such conduct is used as a basis for a decision affecting your job prospects;
- the conduct creates a hostile, intimidating or humiliating working environment for you.

In the event that you feel aggrieved by any such conduct then you should raise the matter through our Grievance Policy.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure.

If it is found that such behaviour is occurring, then this will be dealt with as a disciplinary matter, and will be subject to our Disciplinary Policy.

Disability Discrimination

If you are disabled, or become disabled in the course of your employment with us, you are encouraged to tell us about your condition. This is to enable us to support you as much as possible. You may also wish to advise us of any reasonable adjustments to your working conditions or the duties of your job that you consider to be necessary, or that would assist you in the performance of your duties.

We may wish to consult with you and with your medical adviser(s) about possible reasonable adjustments. Careful consideration will be given to any such proposals and they will be accommodated where possible and proportionate to the needs of your job. Nevertheless, there may be circumstances where it will not be reasonable for us to accommodate the suggested adjustments and we will ensure that we provide you with information as to the basis of our decision not to make any adjustments.

Victimization

If you feel that you are the subject of victimization, then you should immediately raise the matter through our Grievance Policy. We regard the victimization of employees as a serious disciplinary breach and we will automatically instigate an investigation. If it is found that victimization is occurring, then disciplinary action will be taken, which may result in dismissal in accordance with our Disciplinary Policy.

False allegations of a breach of this policy that are found to have been made in bad faith will, however, be dealt with under our Disciplinary Policy.

Monitoring Equal Opportunity and Dignity at Work

We will regularly monitor the effects of selection decisions and personnel and pay practices and procedures in order to assess whether equal opportunity and dignity at work are being achieved. This will also involve considering any possible indirectly discriminatory effects of our working practices. If changes are required, we will implement them. We will also make reasonable adjustments to our standard working practices to overcome substantial disadvantages caused by disability.

Health and Safety Policy

This policy applies to all individuals working for us at all levels and grades, whether they are senior managers, directors, employees, contractors, trainees, home-workers or agency staff (collectively known as “workers” in this policy).

Statement of Intent

This is a statement of policy about our intentions, organization and arrangements for ensuring the health and safety at work of our employees, visitors and contractors, whilst at work on our premises.

Supplementary to this general policy statement, as necessary, there will be specific policies and procedures describing, in detail, health and safety provisions in each part of the Company.

It is our policy to ensure, so far as is reasonably practicable, the health, safety and welfare of our employees while they are at work and of others who may be affected by their undertakings, and to comply with the Health and Safety at Work etc Act 1974 and all other legislation as appropriate.

Objectives

In order to achieve compliance with the statement of policy, we have set the following objectives:

- To set and maintain high standards for health and safety at our offices.
- To identify risks and set in place programmes to remove or reduce these risks.
- To ensure that these standards are communicated to all workers.
- To ensure that all personnel are given the necessary information, instruction and training to enable them to work in a safe manner.
- To ensure the dissemination and discussion of relevant information on safety and health issues.
- To develop promotional campaigns and otherwise to encourage safety and health awareness of all workers.
- To monitor and review our operation in each part of the Company.

You are therefore asked to note the following:-

- It is your responsibility to take care of your own health and safety at work and that of others who may be affected by your acts. You should cooperate
 - with management in complying with health and safety obligations, particularly by reporting promptly any defects or potential hazards; and
 - A First Aid Box is located with the First Aider for each office. If you require any assistance, you should consult the First Aider who will give you
 - what you need and will ensure the Box is fully stocked. You should report all accidents, incidents, hazards or near misses, however minor and
 - whether or not personal injury results, to your local First Aider, who will maintain an Accident Book kept in the First Aid Box.

- You should not attempt to repair faulty equipment yourself, but report it without delay to the ICT Manager or Health and Safety Manager.
- You should refer to our Office Security Policy which provides further details on office security and safety.
- You should refer to our Fire Policy which provides instructions on what to do in the event of a fire.

If you have any suggestions about health and safety matters please contact the Health and Safety Manager.

Responsibilities

To ensure the prevention of ill health and the avoidance of accidents, and the promotion of safe and healthy workplaces, the following responsibilities have been established:

Chief Executive Officer

The Chief Executive Officer has overall responsibility for health and safety within the organization and as such gives his/her full support to the contents of this policy.

Health and Safety Manager

The Health and Safety Manager has established the overall health and safety policy. The Health and Safety Manager has responsibility for implementing and monitoring the policy principally through the Line Directors.

The planning and implementation of the policy within the Company is the direct responsibility of the Health and Safety Manager who will ensure that Managers at all levels and all workers fulfil their duties to cooperate with it.

In addition s/he is also responsible for:

- practical implementation of our Health and Safety policy, the Health and Safety at Work etc. Act 1974, and other relevant legislation;
- carrying out periodic workplace inspections to identify unsafe equipment, working conditions, practices and fire hazards, make reports of
- findings and recommendations to the CEO regarding the remedying of any defects;
- ensuring that risk assessments are carried out in accordance with legislation;
- ensuring that accident investigation is carried out;
- consulting with managers on all issues of health and safety.

Line Directors

The Line Directors are responsible for:

- keeping our health and safety policy under review, in conjunction with the Health and Safety Manager, and ensuring that it is revised as and when necessary;

- reporting on progress to the Health and Safety Manager;
- bringing to the Health and Safety Manager's attention any faults or areas of weakness in the policy or its implementation;
- ensuring that the operations under their control are, as far as is reasonably practicable, conducted without detriment to the health and safety of
- workers or others who may be affected by their activities;
- ensuring that their area of responsibility is subject to risk assessment, regular inspections and audits;
- ensuring that all accidents, incidents and near misses, within their area of responsibility, are reported, with copies kept by each business and
- a further copy sent to the Health and Safety Manager. Reviewing all such reports and ensuring that a full investigation is carried out and
- appropriate remedial action taken, where necessary;
- communicating policy on all health and safety matters within their work areas;
- encouraging all personnel to be involved in matters of health and safety.

Individual Responsibilities

Workers have a statutory duty to take reasonable care for their own safety and for that of other persons who may be affected by their acts or omissions at work. Therefore, all workers are required to:

- take reasonable steps to ensure the health and safety of yourself and that of others who may be affected by your behavior and activities at work;
- refrain from doing anything that constitutes a danger to yourself or others;
- cooperate fully with us to ensure that any duties or requirements imposed by or under any relevant health and safety legislation, related codes
- of practice and safety instructions can be complied with and/or carried out;
- immediately bring to the attention of their line manager any situations or practices that are noted which might lead to injuries or ill health;
- ensure that any safeguards, protective clothing and equipment issued to them, or for which they are responsible,
- maintain good standards of housekeeping, tidiness and cleanliness, especially within your own working area; this includes closing filing cabinet
- and cupboard doors when not in use and keeping all floor and walkway areas free of obstruction;
- adhere to any risk assessment and safety procedures and comply with any relevant information provided by the assessment;
- report all accidents, incidents, dangerous occurrences and near misses, in accordance with Company policy;
- refrain from intentional or reckless interference with anything provided in the interest of health and safety or to misuse anything so similarly provided;
- assist, where required, in the investigation of all significant accidents and incidents in order to discover the cause and prevent any recurrence;

- advise your line manager if you become aware of any change in your personal circumstances that could result in your being at increased risk.

This could include medical conditions, permanent or temporary disability, taking medication and pregnancy.

Arrangements

Consultation and Communication

We recognize that your involvement in health and safety in the workplace is an integral part of ensuring that high standards are reached and maintained and therefore we are committed to involving employees at all levels in the maintenance of health and safety standards.

This policy is displayed on the Health and Safety notice boards and issued to all employees by way of this Handbook. Health and Safety notice boards are positioned in each office. These notice boards will contain general information appertaining to health and safety.

General advice and information is available from the Health and Safety Manager. External health and safety consultants will be used to provide professional health, safety and occupational advice, as required.

The name of the person designated with the responsibility for health and safety on our premises is to be prominently displayed on the Health and Safety notice board for the information of all workers.

Training

Training will be conducted in a planned manner as follows:

- Line Directors will be trained to equip them with an understanding of health and safety legislation and their responsibilities under this policy.
- Health and Safety Manager will be provided with a thorough training programme so that s/he understands health and safety legislation and so
- that s/he is able to fulfil his/her responsibilities under this policy.
- ICT Manager will be provided with a thorough training programme specific to his/her role so that s/he understands the appropriate areas of
- health and safety legislation.
- Workers will be provided with adequate information, instruction and training in respect of health and safety. Training e.g. display screen equipment training, will always be given to workers and wherever possible, within 1 week of joining.

Risk Assessments

Risk assessments will be carried out regularly and also when required under health and safety legislation and will include display screen equipment, lone working, pregnant workers, young persons, manual handling and COSHH (Control of Substances Hazardous to Health). Risk assessments carried out will be recorded in writing and monitored.

Fire Precautions and Emergency Arrangements

Each office will establish a Fire Precautions Plan with the objective of guarding against the outbreak of fire and to ensure, as far as reasonably practicable, the safety of persons on the premises in the event of fire.

The Fire Precautions Plan will include:

- identification and installation of appropriate fire detection and fire fighting equipment e.g. fire alarm system and fire extinguishers, including procedures for its regular testing and servicing;
- a Fire Evacuation Plan to be used in the event of fire or other emergencies;
- nominated individuals with responsibility with respect to fire evacuation;
- arrangements for training for those with responsibility for fire safety and fire evacuation;
- procedures for handling other emergencies e.g. bomb evacuation.

The Fire Precautions Plan will be posted on the Health and Safety notice board and brought to the attention of workers.

First Aid

We make provision for first aid in accordance with the Health and Safety (First Aid) Regulations 1981. The offices will ensure that a risk assessment is made of the environment and work activities and that the relevant requirements are made for providing first aid.

All workers will be shown the location of the first aid box and will be given the names of the designated first aid personnel. This information is also displayed on the Health and Safety notice board.

All injuries, however small, sustained by someone at work must be reported to their line manager or the Health and Safety Manager and recorded in the accident book. Accident records are crucial to the effective monitoring of health and safety procedures and must therefore be accurate and comprehensive. The Health and Safety Manager will inspect the accident book on a regular basis and all accidents will be investigated where necessary and a report prepared, with any appropriate action being taken to prevent a recurrence of the problem.

Occupational Health

Occupational health is the surveillance, diagnosis and treatment of health conditions related to work. You must notify the Health and Safety

Manager if there is any health and safety issue at work that may affect your health.

Non-Employees on Premises

Safety and security arrangements for our premises will be brought to the attention of visitors.

Contractors

All contractors working on our premises are required to comply with appropriate rules and regulations governing their work activities. Where necessary, they will be required to provide relevant information relating to health and safety e.g. Permit to Work. Contractors are legally responsible for their own workforce and for ensuring that their work is carried out in a safe manner.

Policy Review

The effectiveness of this General Policy Statement and other specific policies in use throughout the Company will be regularly reviewed and revised as and when necessary.

Consultants

WAVETEL APS provides consultants on a permanent, contract or interim basis, and we undertake to fulfill our statutory obligations under the Conduct of Employment Agencies Regulations and other statutory articles as may be appropriate to ensure that their health and safety is provided for whilst at work on client sites.

Responsibility

Our clients carry the prime responsibility for the health and safety of our consultants when working on their premises or using their equipment. It is the responsibility of WAVETEL APS to pass on all relevant health and safety information provided by our clients to our consultants prior to them beginning their assignments.

Arrangements

When briefing us, before the assignment, clients will be required to inform us of any specific risks or hazards identified by their own routine risk assessments, any requirements for working long or unusual hours, and the specific skills, knowledge requirements or regulatory approvals for the works to be performed.

Our clients will also be required to provide a copy of their own written Health and Safety Policy Statement prepared for their own employees insofar as it relates to the work performed by our consultant.

We will then pass on the information to the consultant and ensure that s/he is suitable for the assignment.

A written procedure is followed by our compliance team to ensure that the necessary documentation is obtained from the client and passed on to the consultant. Through this process, each party is fully aware of their own and each other's obligations.

Risk Management Policy

Purpose

This policy sets out the framework for managing risk within WAVETEL ApS. In prioritizing WAVETEL ApS's approach to risk management, it is our primary objective to identify, assess and manage each specific area of our business that has the potential to seriously damage our financial position, reputation and relationships with key stakeholders.

Policy

Key elements of our risk management practices are:

- Identifying the threats to the achievement of our business objectives;
- Controlling and managing our exposure to risk by appropriate risk reduction and mitigation actions;
- Regularly reviewing our exposure to all forms of risk and reducing it as far as reasonably practicable or achievable;
- Educating and training our managers in risk management;
- Identifying cost-effective risk treatment options.

Our Board of Directors is ultimately responsible for ensuring that the Company's risk management practices are sufficient to mitigate to the most cost-effective extent possible the risks present in the Company's business.

Objectives

Taking and managing risk is an integral part of our business, and we believe that without risk, there are few opportunities. Our objectives for risk management include:

- maintaining and improving stakeholder confidence in our ability to deliver our commitments, thereby maintaining and improving our reputation in
- the marketplace, through reducing the chance of major surprise;
- improving our competitive advantage by actively demonstrating to our clients our ability to manage risk effectively;
- improving the balance of risk and return by developing and maintaining a proactive, risk aware culture across the business;
- enabling us to further develop our business as a result of our increased ability to assess, report and manage risk.

This policy sets out the framework for managing risk within WAVETEL ApS. In prioritizing WAVETEL ApS's approach to risk management, it is our primary objective to identify, assess and manage each specific area of our business that has the potential to seriously damage our financial position, reputation and relationships with key stakeholders.

Areas of Ongoing Risk to WAVETEL APS

- Technology risks from internal and external computerised systems;
- Economic risks, including interest rate and foreign exchange fluctuations, market conditions, and costs of doing business;
- Market structure and regulation risks, the emergence of competitors from related fields, and regulatory initiatives;
- Operational risks, including transaction processing errors and related business process failures;
- Compliance risks, including issues with regulators having power over licenses required by the Company to do business;
- Business continuity risks, including planning for fire, terrorism, and other events that require disaster management;
- Human resource risks, including succession planning, recruitment, compensation, and retention issues;
- Capital adequacy risks, including access to debt and equity resources necessary to operate and expand Company businesses and compliance
 - with financier's required covenants;
 - Accounting and financial control risk.

Reporting

The Senior Managers have responsibility to inform the Board of identified risks by way of a monthly written report. The reports are discussed and appropriate action plans agreed and documented at monthly Board and General Management meetings. The Board works with management on an ongoing basis to mitigate the risks to the Company's business as they evolve over time.

Environmental Policy

Although WAVETEL APS is not a manufacturing entity and does not generate by-products the Environmental Policy covers all aspects of WAVETEL APS's operations – from good housekeeping measures, such as using both sides of paper prior to recycling, to ensuring that investments made are environmentally sound. The Policy commits us to promoting suppliers and services that adhere to environmentally sound ways of operating.

WAVETEL ApS practises the principles of the 3Rs by:

- Reducing waste where possible by thinking about what we buy and how we use it. Non-essential documents and emails will not be printed. We will annually review which internal documents and external publications are essential; if they are not, they will be cancelled thus reducing waste and saving money. We will endeavour to avoid disposable cups and food packaging bought by the office and for events. We will ensure that all of our printing and photocopying is done double-sided.
- Reuse wherever possible by trying to find a second life for items especially paper and office stationery. Scrap paper will be used in printers, fax machines, for taking messages and for writing notes or draft copies of documents. We are committed to the reuse of envelopes and packaging where possible.
- Recycling all paper, card, glass and tin. Toner cartridges and inkjets will also be recycled. If office furniture or IT equipment is being replaced then WAVETEL ApS will seek to have those items reused or recycled. We will use / support social economy organisations to recycle materials as appropriate.
- We will endeavour to switch all publications and general office papers to 100% post-consumer waste recycled papers; any additional purchasing costs will be balanced against reduced consumption. When purchasing other items of office equipment, recycled options will be considered.
- WAVETEL ApS will seek to purchase fair-trade and environmentally sound goods. In particular, sourcing of refreshments for meetings, training and events should, wherever possible, be purchased from local suppliers to reduce food miles (preferably within the social economy). If possible food should be organic, fruit and vegetables should be in season and tea, coffee and other products should be fair-trade.
- WAVETEL ApS will promote the use of cycling and walking as the main means of travel, and use public transport where systems allow efficient use. For journeys that require the use of a car, car sharing will be encouraged. (Where personal mobility or access issues present an excluding difficulty,
- WAVETEL ApS will cover costs of taxi or other appropriate transport in line with our Equal Opportunities Policy and practice).
- WAVETEL ApS will seek to minimise the use of energy in its activities. For example, lights and equipment will be switched on only when needed and not out of routine.

All staff have access to this Environmental Policy by way of the Company Intranet. The Environmental Policy will be regularly referred to in decision making and through team meetings. It is to be included during the induction of new staff. It shall be reviewed annually by the Management Team.

Sustainability Policy

WAVETEL ApS is committed to promoting sustainability. Concern for the environment and promoting a broader sustainability agenda are integral to WAVETEL ApS's professional activities and the management of the organization. We aim to follow and to promote good sustainability practice, to reduce the environmental impacts of all our activities and to help our clients and partners to do the same.

Principles

Our Sustainability Policy is based upon the following principles:

- To comply with, and exceed where practicable, all applicable legislation, regulations and codes of practice.
- To integrate sustainability considerations into all our business decisions.
- To ensure that all staff are fully aware of our Sustainability Policy and are committed to implementing and improving it.
- To minimize the impact on sustainability of all office and transportation activities.
- To make clients and suppliers aware of our Sustainability Policy, and encourage them to adopt sound sustainable management practices.
- To review, annually report, and to continually strive to improve our sustainability performance.

Practical Steps

In order to put these principles into practice we will:
for travel and meetings

- walk, cycle and/or use public transport to attend meetings, site visits etc, apart from in exceptional circumstances where the alternatives are
- impractical and/or cost prohibitive;
- travel to mainland Europe within a 500km radius normally will be undertaken by train;
- include the full costs of more sustainable forms of transport in our financial proposals, rather than the least cost option which may involve
- travelling by car or air. Where the only practical alternative is to fly, we will include costs for full air fares rather than budget airlines in our financial proposals, and appropriate offsets;
- avoid physically travelling to meetings etc where alternatives are available and practical, such as using teleconferencing, video conferencing or web cams, and efficient timing of meetings to avoid multiple trips. These options are also often more time efficient, while not sacrificing the
- benefits of regular contact with clients and partners;
- reduce the need to travel to meetings and elsewhere, and facilitate regular client contact, by providing a web cam to clients free of charge for the duration of a project where appropriate;

- reduce the need for our staff to travel by supporting alternative working arrangements, including home working etc, and promote the use of public transport by locating our offices in accessible locations.

For the purchase of equipment and consumption of resources

- minimise our use of paper and other office consumables, for example by double-siding all paper used, and identifying opportunities to reduce waste;
- arrange, as far as possible, for the reuse or recycling of office waste, including paper, computer supplies and redundant equipment;
- reduce the energy consumption of office equipment by purchasing energy efficient equipment and good housekeeping;
- purchase electricity from a supplier committed to renewable energy. Seek to maximise the proportion from renewable energy sources, whilst also supporting investment in new renewable energy schemes;
- ensure that timber furniture, and any other timber products, are recycled or from well-managed, and sustainable sources.

Waste Management Policy

As a business, WAVETEL ApS has a duty to ensure that any waste is handled safely and within the law of the Environmental Protection Act 1990 and the Environmental Protection Act (Duty of Care) Regulations 1991.

WAVETEL ApS does not import or dispose of waste. It is a business that transfers waste to others to deal with on their behalf. We only work with contractors who are legally authorized to transport and dispose of waste and ensure that all appropriate documentation is completed and certificates are produced to ensure full compliance with this legal requirement. We pass our waste to waste contractors or recycling companies.

WAVETEL ApS is aware that the duty of care has no time limit. It extends until the waste has either been finally disposed of or fully recovered.

WAVETEL ApS's duty of care ensures that :

- we store and dispose of all our waste responsibly.
 - our waste is only handled or dealt with by people or businesses that are legally authorized to do so.
 - we keep records of all waste that we transfer or receive for at least two years.
- The responsibility we abide by :
- stop anyone storing, disposing of or recovering our waste unless they have an environmental permit (Denmark) or an exemption.
 - Check their permit or exemption to make sure that they are within its conditions.

- package all waste materials appropriately and robustly to stop them escaping from our, or anyone else's control.
- ensure that our waste is only transferred to a person or business authorized to deal with our particular type of waste.
- ensure that the waste being transferred is accompanied by a written description that will enable anyone receiving it to dispose of it or handle it safely and appropriately.

Storing and Disposing of Our Waste Responsibly

All waste has the potential to pollute the environment if we do not handle or store it properly.

Storing Waste

- WAVETEL ApS store all waste materials safely and securely in suitable containers such as, wheeled bins and skips.
- We ensure that any containers we use are in good condition and that they are clearly labelled. If containers are reused we make sure that you remove any old labelling.
- We ensure that waste materials cannot blow away and that pollutants cannot leach from the waste into the ground. The waste that is stored in skips or other similar containers are covered or netted where necessary to prevent loose and lightweight material from blowing away.
- WAVETEL ApS ensure that our storage facilities are secure against vandalism or other outside interference.

Handling Waste

- WAVETEL ApS ensure all employees and contractors working on our premises instructions about how to handle and dispose of each type of waste that might be produced. We regularly check that our employees and contractors are following these instructions.

Waste Carriers and Management

- Our waste carriers are registered carrier's and are able to produce a certificate of registration or a certified copy. This certificate will show when their registration expires and we ask to see the original or a certified copy which a photocopy is taken for our records, with a record of the date to ensure we have seen the original.
- WAVETEL ApS ensure that anyone who treats, stores or disposes of our business waste has an appropriate environmental permit or exemption certificate.
- We repeat checks regularly to ensure registrations and authorizations are not expired or have been revoked.

Records for Receiving and Transferring Waste

- WAVETEL ApS will ensure that a Waste Transfer Note (WTN) is accompanied with any transfer of waste between different holders. This is to allow other people who handle our waste to know what they are dealing with, so that they can manage it safely and properly.
- We create a WTN for each load of waste that leaves our site.
- Our WTN contains enough information about the waste to enable anyone coming into contact with it to handle it safely, and either dispose of it or allow it to be recovered within the law.
- On all Waste Transfer Notes, we describe the quantity and types of each different waste being transferred on the WTN.
- The WTN includes details of how the waste is contained, ie whether it is loose or packaged. If the waste is packaged, then the WTN should include details of the type of container.
- WAVETEL ApS ensures that they will be in the best position to describe our waste accurately. It is not acceptable to use non-specific terms, e.g. 'general waste' or 'inert waste'.
- Both WAVETEL ApS and the waste carrier must sign the WTN before the waste leaves our site.

Waste Carriers, Brokers and Dealers

WAVETEL ApS keep copies of all WTNs for at least two years. This is our record of the type and quantity of waste we transferred, how it was packaged, when it was transferred, where it went and who we transferred it to.

Complaints Policy

WAVETEL ApS is committed to providing a high level of service to our customers. If you do not receive satisfaction from us, we would ask you to tell us about it. This will help us to improve our standards.

Complaints Procedure

If you have a complaint, please address this in writing to Jan Henriksen, Managing Director. You can write to him at WAVETEL ApS, Grant Thornton, Stockholmsgade 45, 2100 København Ø, Denmark. or by email at jh@Wavetel.net

Next steps

1. We will send you a letter within 5 working days acknowledging your complaint and asking you to clarify or provide further details. We will also let you know the name of the person who will be dealing with your complaint.
2. We will record your complaint in our central register within 2 days of receiving it.
3. When we receive the requested details from you (if applicable), we will then investigate your complaint. This will normally involve the following steps:
 - We will consider your complaint and review all relevant paperwork and documentation;
 - We will speak to the relevant members of staff who dealt with you;
 - We will carefully examine all available information in order to reach our decision.
4. We will write to you with our formal response and any solutions or outcomes that have been agreed within 15 working days of receiving all information.
5. At this stage, if you are still not satisfied, you may write to us again. Another Director of the Company will review the original decision.
6. We will let you know the outcome of this review within 10 working days of receiving your letter. We will write to you confirming our final position on your complaint and explaining our reasons. If we have to change any of the time-scales above, we will let you know and explain the reasons why.

Contact Information

Office Denmark: +45.332.334.93 (Head office)

Office Spain: +34.971.721.210

Office Portugal: +351.214.397.622

Please refer to the Contact Us pages on our website for more information.