



Anti-Bribery Policy Statement

1. POLICY STATEMENT

The Company gives due consideration to all appropriate legislation with respect to the use and misuse of drugs and alcohol and has adopted a compassionate attitude towards all employees and realizes the possible effects and consequences of the misuse of drugs and alcohol. As such Oliveti Group will endeavour, so far as is reasonably practicable to provide guidance and support as and where necessary through the Companies Mental Health First Aider.

The Company adopts the approach that any employees who develop alcohol, drug related or other additions, could cause harm to both themselves and others. In addition to the general requirements of the above legislation, the Misuse of Drugs Act details our obligation to notify the Police if a member of staff is found to be in possession of drugs or be supplying illegal substances. Employers and employees have a duty to comply with this policy, and ensure that the details are effectively carried out.

2. SCOPE

This policy statement applies to all Oliveti Group employees including Senior Management, sub-contractors and any other individuals working on behalf of Oliveti Group at any time.

This Policy will be communicated to all employees and subcontractors via the Company's Employee Handbook and the Company's Induction process for individuals joining the Company.

All employees and subcontractors who, during the course of their engagement have a duty and responsibility to implement and adhere to the Company's drugs, alcohol and other additions Policy.

3. OBJECTIVES

The Company recognizes that drug and alcohol dependency is primarily a health problem. It is our policy to offer support for the rehabilitation of affected employees that actively seek to overcome these problems.

The Policy is intended to promote awareness about substance misuse and sets out guidelines on how to identify a problem, and how to deal with it in terms of both treatment and discipline. It applies to all members of staff, regardless of length of service or status.

The Company aims to provide a safe working environment for its employees, contractors and visitors, and an efficient service for its customers and other persons who may be affected. With this in mind, the aims of the policy are as follows: -

- To encourage anyone with a drug, alcohol or other addition related problem to come forward and seek help. It is the company's policy to ensure that any member of staff, who informs us to any such problem, will be treated in the same way as any member of staff with a medical condition. This means, sensitively, with respect, and in confidence (within the constraints of any legal requirements). We will support the employee in a rehabilitation program that has the key objective of returning them to effective work.
- To provide employees with general information about the effects of drugs, alcohol and other addictions.
- To eliminate problems at work arising from drug or alcohol misuse by identifying staff or contractors whose performance is impaired by drug or alcohol use, and to take steps to resolve any problem that may arise?
- To make employees and contractors aware that to use, possess, consume, store or sell drugs and/ or Alcohol on company premises and/ or Construction Sites, or, to report for work under the influence of drugs or Alcohol, will be considered to be gross misconduct and will result in disciplinary action with possible termination of employment and involvement of the Police.



- To make employees and contractors aware that the taking of prescribed drugs or over the counter medications may impair their work performance and safety.
- To make employees aware that, if they have been involved in drug or alcohol offences, which may affect the image of the organization, they may be subject to the organization's disciplinary procedure.

Over the counter drugs used for the treatment of common disorders will not be regarded as 'Drugs' except as described below:

- For the purpose of this Policy, the term substance misuse means the illegal use of drugs, and the problematic or inappropriate use, whether deliberate or unintentional, of prescribed drugs or alcohol.
- In addition to this, the company regards the use of solvents, and 'over the counter medications', in such a way that attitude, behaviour or performance at work is likely to be affected, as falling within this definition

4. THE POSSESSION, USE AND/OR SUPPLY OF SUBSTANCE

The possession, use and/or supply of substance of misuse by employees, is prohibited on company premises and on company business, at all times. Any member of staff found in possession of substance of misuse on company premises, or on company business, may be guilty of gross misconduct and could be liable to dismissal. In such circumstances, the company is also required by law to notify the Police.

It should be noted that symptoms that may appear drug related can also be caused by other problems i.e. stress, heat exhaustion, hypothermia, diabetes etc. Therefore, if there is any doubt as to the person's condition or cause of their condition, medical advice should be sought immediately.

5. THE ROLE OF MANAGEMENT:

1. To be responsible for maintaining a safe and healthy working environment.
2. To familiarize themselves with every aspect of this policy and to procedures relating to substance misuse.
3. To ensure that their employees and contractors understand this policy and their responsibility to comply.
4. To be alert and to monitor changes in work performance, attendance, sickness and accident patterns.
5. To take an objective and non-judgmental approach to counselling, or interviewing, a member of staff suspected of substance misuse.
6. To refer the member of staff for appropriate assistance.
7. To identify any aspect of the working environment (such as stressful work situations), which could possibly lead to substance misuse and take measures to address them.
8. To intervene at the earliest opportunity, when there are signs of a problem.
9. To act promptly on information from employees.
10. To refer to the organization disciplinary procedures where appropriate.

6. THE ROLE OF EMPLOYEES:

1. To be responsible for maintaining a safe and healthy workplace.
2. To familiarize themselves with the company's information about substance misuse and its consequences for health and safety.
3. To avoid covering up for, or colluding with colleagues.
4. To urge colleagues affected by substance misuse, to seek help.
5. To seek help, if they are personally affected by substance misuse.
6. To alert management of any incidence, or problem, relating to substance misuse.



7. THE ROLE OF EMPLOYEES:

Help is available by contacting:

- ✓ A Director, the company Mental Health First Aider, Line Manager
- ✓ National Drugs Helpline on **0800 776600** (all calls are confidential and will not show on bills).
- ✓ Alcoholics Anonymous Great Britain **0800 9177 650**
- ✓ National Gambling Helpline **0808 8020 133**
- ✓ Leicester City Alcohol and Drug Service **0330 303 6000**
- ✓ The Lighthouse Charity Construction Industry Helpline **0345 605 1956**
- ✓ MIND **0300 123 3393**

8. POLICY REVIEW

Olivet Group will regularly review this Policy Statement to determine its effectiveness in order to ensure it remains appropriate to the nature and scale of the organisations risks. The Policy Statement will be amended when changes to legislation or operational procedures require. Amendments will be issued to all Oliveti Group employees, subcontractors and any other individuals working on behalf of Oliveti Group where necessary.

Signed:

G Oliveti, Managing Director

January 2022