

1.0 Governance Policy Statement

DBD Distribution Ltd is committed to applying the highest standards of ethical conduct and integrity to its business activities in the UK, and depends on the development and management of clear written policies and procedures to support this commitment.

Policy Governance is therefore important to both the efficient and effective operation of the organisation, and its integrity and reputation, and as such needs to ensure that the Company's policies and procedures:

- are compliant with all corporate legislation and law
- are consistent with the Company's culture and values
- reflect the Company's business practices and expectations
- assist in managing accountability in the creation and implementation of these policies and procedures.

The Directors and senior management team are committed to defining, implementing, communicating and enforcing clear, relevant and effective policies and procedures throughout the Company.

2.0 Governance Policy

The Company's written policies and procedures provide tangible evidence of intended practices that are both clear and consistent with the Company's values and assist the organisation to function by enabling:

- colleagues to get on with their jobs without the need to discuss issues each time they arise
- consistency and predictability regarding the Company's policies and procedures throughout the organisation
- risk to be managed through its policies and procedures

It is therefore critical that the Company's governance policy:

- clearly sets out the policy documentation that defines and governs the Company's activities
- sets out the requirements for creating policies and procedures
- defines the roles and responsibilities in developing, implementing, managing and reviewing policies and procedures

2.1 Governance Policy Scope

The Company has two categories of policy which can be defined as:

i) Governance – these are policies that are required for statutory, regulatory or strategic purposes to keep the company on track and operating efficiently. These will be public documents used by the Company in the pursuit of its business and ethical objectives, and available to customers on demand as part of the business pre-qualification tender process.

ii) Operational – these are policies that refer to practices and procedures across a wide range of activities, generally relevant to employees, and managed by the Human Resource Department within the Company's Employee Handbook and Family Friendly Booklet.

The Governance Policy Scope will include both the above categories.

3.0 Policy Documentation

The information detailed below lists all the current policies, defined as either Governance or Operational, together with the current location of these documents in our database.

3.1 Governance (Location: DBD H&S SharePoint Policies Folder)

Policy Documents:

- Anti Bribery & Whistle Blowing Policy
- Drug & Alcohol Policy
- Environmental Policy
- Equal Opportunities Policy
- GDPR Policy
- H&S Management System
- H&S Policy
- Modern Slavery Act Policy
- Occupational Health Policy
- Quality Policy
- Young Workers Policy

3.2 Operational (Location: HR SharePoint Folder + Individual Employee HR Select Accounts)

Policy (Employee Handbook):

- Disciplinary Policy
- Grievance Policy
- Capability Procedure
- Welfare Meeting Policy
- Credit Card Policy
- Expenses Policy
- Eye Test & Glasses Policy
- Equality, Inclusion & Diversity Policy
- Personal Harassment Policy and Procedure
- Bullying and harassment Procedure
- Equal Pay Policy
- Dignity at Work Policy
- Stress and Wellbeing at Work Policy
- Compassionate Leave Policy
- Relationships at Work Policy
- Conflicts of Interest Policy
- Health and Safety Policy Statement
- Drug and Alcohol Policy
- Data Protection Policy
- Driving and Vehicle Policy
- Whistle Blowing Policy
- Environmental Policy
- Inclement Weather Policy
- Security Camera Policy
- Anti Bribery Statement
- Modern Slavery Act Policy
- Leavers Policy

Policy (Family Friendly Booklet):

- Maternity Policy
- Paternity Leave Policy (updated April 2024)
- Adoption Leave Policy
- Shared parental Leave
- Parental Leave Policy
- Parental Bereavement Policy
- Time off for Dependents Policy
- Flexible Working Policy (updated April 2024)
- Carers Leave Policy
- Menopause Policy

4.0 Policy Development and Process

As part of the Company's policy review process the requirement for new policies or procedures may be identified in response to change, including but not limited to changes in:

- government policy or legislation
- internal operating environment / requirements
- external operating environment / requirements

Where the need for new policies or procedures is identified, then the new policy or procedure will be developed in accordance with the following development stages:

- Policy needs identified
- Policy author (responsible Manager) and approver (accountable Director) appointed
- Draft Policy document researched and drafted in language consistent with existing policy structure and format
- Draft Policy document circulated for consultation with stakeholders
- Policy approval (Board)
- Policy communication and implementation
- Policy maintenance and review timescales defined

5.0 Policy Governance

The following details define the roles and responsibilities in developing, implementing, managing and reviewing policies and procedures

5.1 Roles and Responsibilities in developing policy and procedure.

The responsibility for developing policy and procedure will sit with either the departmental manager, as detailed in Section 4.0 above, with the direction, leadership and support of the function Director, or will be initiated and led directly by the function Director.

The roles and responsibilities in relation to the Company's policy documentation as detailed in Section 3.0 Policy Documentation have been assigned in accordance with the following summary:

i) Governance

a) Group Finance Director

- Anti Bribery & Whistle Blowing Policy

b) Chairman of the Board (HR)

- Drug & Alcohol Policy
- Equal Opportunities Policy
- Modern Slavery Act Policy
- Occupational Health Policy
- Young Workers Policy

c) Group Compliance Director

- Environmental Policy
- GDPR Policy
- H&S Management System
- H&S Policy
- Quality Policy

ii) Operational – Employee Handbook

a) Group Finance Director

- Credit Card Policy
- Expenses Policy
- Anti Bribery Statement

b) Chairman of the Board (HR)

- Disciplinary Policy
- Grievance Policy
- Capability Procedure
- Welfare Meeting Policy
- Eye Test & Glasses Policy
- Equality, Inclusion & Diversity Policy
- Personal Harassment Policy and Procedure
- Bullying and harassment Procedure
- Equal Pay Policy
- Dignity at Work Policy
- Stress and Wellbeing at Work Policy
- Compassionate Leave Policy
- Relationships at Work Policy
- Conflicts of Interest Policy
- Drug and Alcohol Policy
- Whistle Blowing Policy

- Inclement Weather Policy
- Security Camera Policy
- Modern Slavery Act Policy
- Leavers Policy

c) Group Compliance Director

- Health and Safety Policy Statement
- Data Protection Policy
- Environmental Policy

d) Group Commercial Director

- Driving and Vehicle Policy

iii) **Operational – Family Friendly Booklet**

a) Chairman of the Board (HR)

- Maternity Policy
- Paternity Leave Policy
- Adoption Leave Policy
- Shared parental Leave
- Parental Leave Policy
- Parental Bereavement Policy
- Time off for Dependents Policy
- Flexible Working Policy
- Carers Leave Policy
- Menopause Policy

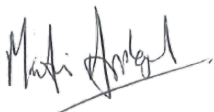
5.2 Roles and Responsibilities in implementing and managing policy and procedure

The responsibility for implementing and managing the Company's policy and procedure will sit with either the respective departmental manager immediately affected by this policy or procedure, with the direction, leadership and support of the function Director, or will sit directly by the function Director.

The communication of the Company's policies and procedures to the Company's employees and customers will be principally by either the HR Department, the Health & Safety Department or the Commercial Risk Department

5.3 Roles and Responsibilities in review of and compliance with policy and procedure.

Directors and Departmental Managers will be responsible for undertaking regular reviews of the Company's policies and procedures, supported by an annual compliance audit, as directed by the Group Operations Director.



Martin Appleyard
Group Compliance Director

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| Owner: | Martin Appleyard |
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