





	Code of Practice for Suppliers & Subcontractors				
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S&R Construction Ltd

Code of Practice

For Suppliers & Sub-Contractors

		<h2>Code of Practice for Suppliers & Subcontractors</h2>				
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INTRODUCTION

Your organisation has an important contribution to our customer product and service delivery process. For us to efficiently meet our customer expectations it is important that you meet all contractual requirements agreed with us.

In order for us to continually provide improved services and meet our business objectives, S&R Construction Ltd (the company) have produced this Code of Practice to assist our suppliers and subcontractors and others, authorised to be present on Company projects, sites and developments, to be aware of and apply the general standards currently in force and to further the effective and co-ordinated management of quality, environmental, health, safety and welfare on premises under the control of the Company or the Company's clients.

These general standards are complementary to the programming and controls, which are already established. **In order to demonstrate the importance of this commitment, the provisions of this procedure constitute an element of the Conditions of Contract between the Company and its Suppliers / Subcontractors.** The procedures are minimum standards, which should be reflected in the controls exercised on site.

As a Supplier / Subcontractor to S&R, you play a crucial contribution to our performance and the effectiveness of our management system. By conforming to this code of conduct, not only will our organisations prosper, but all of our employees will remain safe and the environment in which we live will be protected.





Likewise, the implications of not conforming to our requirements / fulfilling your compliance obligations can have serious ramifications for all parties involved (not least accidents, incidents, ill health, bad publicity, prosecution and loss of revenue) and this is not an option. S&R will take all necessary and immediate action where a supplier / subcontractor is found failing in this regard.

S&R has the following policies in place (copies provided with this Code of Practice) and we expect our suppliers / subcontractors to either have equivalent policies in place or agree to comply with the requirements of our policies:

1. Integrated Safety, Health, Environmental and Quality Policy
2. Immigration, Asylum and Nationality Policy
3. Anti-Bribery & Corruption Policy
4. Drugs & Alcohol Policy
5. Equal Opportunities Policy
6. Corporate & Social Responsibility
7. General Data Protection Policy
8. Criminal Finance Policy
9. Modern Slavery & Human Trafficking Policy
10. Fraud Policy
11. Communications with Customers Policy
12. Whistleblowing Policy
13. Sustainability & Carbon Management Policy
14. Cyber Security Policy

Failure to comply with the above may lead to immediate termination of any contracts with yourselves. Furthermore, S&R expect our Suppliers and Subcontractors to support us in achieving our company targets (copy provided with this code of practice).

Please ensure that the contents of this code and our policies are briefed to all personnel who may undertake work relating to S&R.

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INSURANCE

S&R as a responsible company, has sufficient insurance in place to protect both the business along with anyone that might be adversely affected by our actions. A condition of our insurance cover is that any suppliers / subcontractors that we use must also hold appropriate levels of cover, which, as a minimum, must be equal to our levels of insurance cover.

Levels of insurance held by S&R are as follows:

- ✓ Public and/or Products Liability: £10 Million + Indemnity to Principal Clause
- ✓ Contractors All Risks Policy – £1.5 Million
- ✓ Hired in Plant: £500,000
- ✓ Professional Indemnity: £5 Million
- ✓ Employers Liability Policy: £10 Million

FINANCIAL

It is important that payment terms for all works have been agreed in writing with S&R prior to the commencement of any works / provision of any services. Please note that final payment will only be paid once all completion / hand-over paperwork is completed and provided to S&R (e.g. test certificates, as-laid, reports).

Works completed / services provided must not deviate from the original works agreed with S&R unless a Variation Order and Purchase Order has been issued.

All works shall only begin once a Purchase Order has been received; Otherwise, you run the risk of completing work / providing services at your own cost.





BACKGROUND CHECKS

S&R has a responsibility for the safety of its employees and the public. It is therefore a mandatory requirement that S&R undertake background checks on its employees, and our Suppliers / Subcontractors to undertake similar background checks of their own employees. The following basic Background checks must be undertaken for all staff:

1. **Right to work in the UK**
2. **Employment / Education Verification**

Furthermore:

- All teams licensees and training must have been sent and approved by S&R before works begin.
- All teams must complete a S&R induction.
- Each team must have an iPad/tablet suitable for use with our Appcan system, allowing access to all S&R job packs (drawings / utility plans / RAMS etc.) and providing the ability to complete daily electronic records (daily site-specific risk assessment, plant and equipment checks, test records, as-laid information etc.).
- All teams will wear suitable PPE and have all the correct equipment available for their works e.g. Cat & Genny, Chapter 8 barriers, signage.

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ACCESS ONTO CLIENTS SITES - REGISTRATION OF PERSONNEL AND VISITORS

Suppliers and Subcontractors employed by the Company shall be responsible for ensuring that individuals working under their control report their presence by signing in, on arrival on site, and signing out when leaving the site. Visitors must be intercepted before entering the site so that relevant information, rules, and hazards can be communicated to them and to ensure that other controls are enforced, for example making sure visitors are accompanied on site. These are essential control requirements, introduced in order to confirm that:

- (a) the premises are clear when the site is locked up
- (b) all personnel may be accounted for in the event of an emergency evacuation
- (c) only authorised personnel are allowed to enter the site.

INJURY, ILL-HEALTH AND/OR DAMAGE INCIDENTS

1. All injuries shall be reported to the client's site first-aid point, regardless of their seriousness, and to the S&R Site Manager / Supervisor along with reporting it to the Company they are employed by.
2. Any incident that causes, or is suspected of causing, acute or chronic ill health must be notified without delay to the S&R Site Manager / Supervisor along with reporting it to the Company they are employed by.
3. Any incident, which results in damage to plant, equipment or property, must be notified to the S&R Site Manager / Supervisor along with reporting it to the Company they are employed by.

If there is no S&R Project Manager / Supervisor on site, report it to the S&R SHEQ Manager.

Any incident which occurs on site and which falls within the remit of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013, may be investigated by the Company SHEQ Department or other authorised individual. In order to assist in establishing the chain of incident causation, the full co-operation of all organisations and personnel is expected and required. Statutory enforcement agencies or other involved parties may in addition to any other investigation conduct an investigation.

NEAR MISS INCIDENTS

In order to assist in developing a profile of events that have the potential to cause injury or damage (to property or the environment), 'near miss' incidents should be notified to the S&R Site Manager / Supervisor or S&R SHEQ Manager. The co-operation of respective organisations, their supervisory staff, and personnel working under their control is requested in this respect.





IMPROVEMENTS

The Company encourages people to make suggestions on how we may improve the company and the way in which it operates and this extends to our suppliers / subcontractors also. Suggested improvements can be made to the S&R SHEQ Manager.

WASTE MANAGEMENT CONTROL AND SAFE ACCESS

All contractors and personnel working under their control shall be required to:

- (a) clear waste/debris generated by their task(s) as their work progresses
- (b) maintain a clear access/egress route along dedicated/nominated evacuation routes

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- (c) report any circumstances where preceding or adjacent trades, or client's activities are compromising the maintenance of safe access/egress routes
- (d) transfer any waste to the designated holding area on site, (this may be general waste, hazardous or special waste, or subject to controls imposed by site rules).

PUBLIC SAFETY AND VEHICULAR ACCESS TO SITE

Any activity or task progressed on or over any area which is dedicated to public use, whether pedestrian or vehicular, shall be subject to specific controls which will be detailed in health and safety plans or site instructions. Vehicles allowed onto site shall be restricted to a maximum speed of 5mph or that determined by the client/site operator

MATERIALS MANAGEMENT AND CO-ORDINATION

Deliveries of materials and components to site shall be co-ordinated to complement the overall Company programme as well as the client's requirements. Materials and components shall be off-loaded at designated areas and locations which shall initially be identified by the client, and thereafter formally revised as work progresses.

ADMINISTRATION AND ACCOMMODATION UNITS

The Company shall determine the siting and layout arrangements for:

- (a) administration units
- (b) accommodation units
- (c) toilets and washing facilities
- (d) canteen facilities
- (e) registration point for visitors
- (f) first aid unit/point.

Where applicable, a formal shared welfare arrangement shall be agreed (toilets, drying rooms, canteens and stores), including procedures for cleaning the facilities and the standard of hygiene required.

Companies providing welfare or storage units onto site shall ensure that:





- (a) the units comply with prevailing fire resistance standards
- (b) the units are sited at an agreed location
- (c) the units are of a suitable quality and are clean.
- (d) the units are well maintained (including any generator etc.) and be Eco-Friendly where-ever Possible (energy / water saving measures etc.)

In addition, if you are bringing units onto site for your own use, you must ensure that:

- (e) the units are of a suitable quality and are clean
- (f) only scheduled materials and components are stored within the units
- (g) the purpose/function of each unit is clearly displayed
- (h) copies of Employer's Liability certificate, safety policy are displayed.

STATUTORY NOTICES

Any Subcontractor shall provide relevant statutory notices, which should be displayed at a common, access point.

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STATUTORY REGISTERS

Suppliers and Subcontractors shall be required to have available, and maintain, their own relevant statutory registers and records, and these must be available for inspection and validation by any S&R Representative / Member of the Company management team.

SAFETY SIGNS

Each Supplier and Subcontractor shall allocate safety signs which conform to current British / International Standards, ISO7010 for general safety signs and for fire BS 5499. Contractors, and personnel working under their control, shall be required to comply with the instructions contained within such signs.

Disregarding a safety sign will result in the offending individual being subjected to the Company's disciplinary rules.

FIRE PREVENTION MANAGEMENT CONTROLS

Subcontractors and personnel working under their control are required to comply fully with fire prevention management control procedures and implement such procedures, as detailed by S&R clients.





Common to each Company will be:

- a) arrangements for the identification, storage and use of designated 'flammable' and 'highly flammable' materials and containers
- b) special arrangements for the import and use of materials and containers, which are, assigned the risk phrases 'Highly flammable' or 'Extremely flammable'
- c) selection and provision of fire fighting first aid equipment
- d) the issue of hot-work permits for assessed safety critical tasks and operations, and locations
- e) siting, frequency, marking and maintenance of dedicated fire points
- f) the means of ensuring all workers are aware of what to do if they discover a fire.
- g) a no smoking policy is operated on all sites and work locations as well as in clients premises and welfare facilities
- h) Subcontractors shall be required to identify how they will comply with their fire prevention policy, and how they will introduce their own, individual controls for hot-work processes and flammable, highly flammable and extremely flammable materials and containers.

ELECTRICITY

Portable hand tools and plant

1. All electrically powered portable hand tools and plant should be rated at 110V, or be battery operated.
2. All electrically powered hand tools will be tested in line with HSE Guidance HSG 107 (inc. test / inspection frequencies) and marked with the date of their last test and inspection.
3. All connections and leads shall be subject to daily visual inspection for defects and shall be subject to nominated detailed inspection frequencies. No out of test date equipment shall be used.
4. Any item of defective or suspect plant shall be tagged with a "Danger — Do not use" sign.

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- Where authorised to be on site, portable generators shall be earth bonded as specified by the manufacturer.

Accommodation units

- Electrical supplies to accommodation units shall be installed, commissioned, tested and maintained by an approved electrician, and shall comply with statutory and industry standard requirements.
- Voltages exceeding 240V may only be installed with the formal authority of the Company and shall be subject to conditions set down by the Company.

Battery charging operations

Battery powered plant (excluding hand-held items) may only be charged with the formal authority of the Company.

Overhead electrical services

The Company shall, in conjunction with the service owner, establish and maintain demarcation limits for work in the vicinity of overhead power lines. Each site shall be subject to individual assessment. Contractors and personnel working under their control must confirm their understanding of the individual demarcation and access limitations by physical barrier or formal permit-to-work. The precautions will be applied to work on or adjacent overhead travelling cranes.

Underground utility services

Excavation work or ground penetration shall be undertaken in accordance with HSE Guidance document HSG47 and may not proceed until the ground conditions and buried services have been ascertained and verified by the contractor concerned.

Striking an electrical cable with a metal tool – whether a hand or power tool – will most likely result in an arc flash incident. Injuries are usually caused by exposure to the arc flash, which means that FR garments aren't enough to keep civils operatives protected.

The main risk of injury from cable strikes is from an arc flash. Where electricity cables may be encountered during excavation work, especially HV cables, you must consider whether your civils operatives need to wear clothing designed to protect against electric arc, not just flame-retardant clothing.





Open Excavations

Contractors must consider pedestrian safety and the need for suitable barrier systems, including protection of pedestrians where there is the risk of pedestrians falling into excavations. At all static works, pedestrians must be protected by a continuous system of barriers.

If an unattended site contains an open excavation within 2 metres of a temporary or permanent footway, then you should consider either:

- putting temporary covers over the excavation; or
- providing an enhanced barrier around the excavation;

unless a site-specific risk assessment shows that such additional protection is not justified.

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In some circumstances, your risk assessment may determine that enhanced guarding is required – for example if the site is to be left unattended, if it is next to a busy pedestrian thoroughfare, if there are pubs, clubs, football grounds or schools nearby, or if a deep excavation is present.

Temporary covers placed over open excavations must be capable of preventing a person from falling into the excavation. These covers should resist being displaced by wind. As such, they might require ballasting or some other method for fixing them in place.

Any barrier used as a collective means of (fall) protection must be of suitable height, be so placed and constructed, and made of materials robust enough, to resist the impact of a person falling against them when properly installed.

It is likely that “Chapter 8” barriers will not offer suitable pedestrian protection if placed around the perimeter/edge of an excavation and you need to consider erecting heras fencing, temporary hoardings or a structure of such strength as to resist collapse upon impact of a person, consisting of scaffold tubes or similar.

Where it is not possible, Chapter 8 type barriers may be used as warning barriers if they are adequately interlinked to prevent entry in to an “unauthorised area”. The barriers should be placed at sufficient distance from the edge of the excavation such that if they do collapse when struck, the person striking them is able to recover themselves from the fall without falling into the excavation.

S&R has decided on the following policy going forward on all future works:

Joint Holes – All joint holes to be protected by Heras fencing.

Cable Trenches – If less than 400mm wide, trench to be protected by chapter 8 barriers. Anything greater than this to be decided on a case by case basis taking into account the location / overall size of the trench etc.

Commissioning and de-commissioning electrical services

Contractors involved with the commissioning and de-commissioning of electrical services or appliances capable of being energised, shall have in place an approved safe system of work including isolation control.





Site-specific controls

Detailed site-specific controls for electrical safety shall be included within the clients/site requirements.

Safe Working at Heights

Leading edge protection shall be established and maintained at points and locations where it is foreseeable that personnel, or materials, may fall from one level to another. The barrier shall be sufficiently substantial to resist the force or impact of an individual, and shall incorporate a secured toe-board, kicker-board and an intermediate barrier to prevent an individual slipping under the barrier, or materials from being kicked or knocked from one level to another.

Contractors authorised to use proprietary mobile towers on site must ensure that such plant is erected by competent personnel, used within its limitations and inspected at prescribed frequencies.

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Where mobile elevating work platforms, or similar plant, are used, or where man-riding cages/skips are authorised, full procedures must be identified for operator competence, training, inspection arrangements and certification.

Subcontractors will be required to comply with the S&R Emergency Response plan for rescue of a stranded person from height or prepare and implement their own equivalent plan.

OCCUPATIONAL HEALTH

Noise

Subcontractors importing noise-generating plant onto site shall assess the area where the plant will be used and will confirm the sound levels for the location(s). Any area where sound levels reach the second action level must be clearly marked using the mandatory status safety sign.

Manual handling

As assessment of manual handling requirements, and the methods or controls to assist in reducing the potential for injury from manual handling operations, will be identified within each supplier / subcontractor's safety method statement.

Hazardous substances

Any manufactured or process-generated substance which is either imported onto site or occurs on site, and which has been assigned a Workplace Exposure Limit (WEL) within the current edition of the Health and Safety Executive's Guidance Note EH40 Occupational Exposure Limits, shall be subject to a site-specific assessment. The result of such an assessment shall be issued to the personnel involved with the task, and to the S&R Site Manager / Supervisor.

Note: Any product which is assigned as falling into one of the following categories:

"Serious Health Hazard"

"Hazardous to the Environment"

may not be used on site without the formal authority of the Company.





Asbestos

Any asbestos material on site should be identified before work starts. S&R shall request information from clients regarding asbestos presence. A licensed Contractor must carry out any works dealing with asbestos insulation, asbestos coatings and asbestos insulation board. A Contractor should ask if there is asbestos on site within the designated area of work and if so, get advice from the Company before commencing work.

Whilst working on a site should the Contractor come across any hidden or dusty materials which it is suspected may contain asbestos then work should be stopped immediately and advise S&R accordingly.

Any materials suspected as containing asbestos should not be damaged in an attempt to identify it. Samples should only be taken by suitably trained people.

S&R requires that its contractors provide appropriate employees with asbestos awareness training.

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Alcohol and drugs

Any individual on site found to be consuming, or under the influence of, drugs or alcohol will not be allowed to remain on site.

Specialist tasks

Tasks or operations requiring extensive welding, radiography or lasers shall be subject to site-specific controls.

Personal Protective Equipment

All Projects, developments and clients sites under the control of the Company shall be subject to the following minimum requirements for personal protective equipment (PPE):

- (a) the wearing of safety helmets
- (b) the wearing of industrial footwear
- (c) Industrial clothing (e.g. overalls)
- (d) other items as may be determined by mandatory status safety signs / client site rules.

Other PPE requirements shall be subject to assessment by each individual supplier / subcontractor in accordance with the Personal Protective Equipment at Work Regulations.

All PPE must be “CE” Marked / “UKCA” marked to indicate compliance with PPE Regulation (EU) 2016/425.

Note: PPE shall always be considered a last resort, not as an alternative to a safe system of work.

ENVIRONMENTAL CONTROLS





S&R is committed to the protection of the environment and requires all of its suppliers and subcontractors to comply with the protocol outlined below:

- All relevant Environmental Legislation, regulations and company procedures to be followed, in particular but not limited to the control of waste e.g. all hazardous waste generated to be removed from site and disposed of in an appropriate manor. An appropriate waste consignment note to be produced and given to our site representative. Non-hazardous waste can be deposited in the appropriate waste receptacle.
- Ensure awareness of all applicable statutory obligations, associated official guidance and recognised best practice related to the identified significant environmental aspects.
- Provide details of the environmental performance / impact of any products and / or services being offered including any associated packaging.
- Any on-site incident that could lead to a pollution incident to be reported immediately to the S&R Site Manager / Supervisor
- S&R may request evidence of compliance with appropriate licenses, qualifications etc.
- Deliver spill and fire response training to appropriate staff and keep records of training as evidence.

Suppliers / Subcontractors shall be advised of the minimum requirements for individual clients/site requirements.

Finally, S&R have identified the following significant environmental aspects and impacts applicable to our operations and which we need you to help minimise:

- Vehicle Fuel consumption and emissions to atmosphere
- Use of Raw Materials (e.g. cable)

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- Use of chemicals and hazardous substances
- Electricity Usage
- Emissions to air
- Releases to water
- Releases to land
- Generation of waste to landfill
- Damage to flora and fauna

THIRD PARTY AND PUBLIC SAFETY

Each contractor shall be required to appraise and record their controls for assisting in securing the safety of personnel not in their employment or working under their control, and to maintain the safety and protection of members of the public and authorised visitors to site. (This will apply to trades working above other trades, mobile plant operators, and to the movement of traffic on or near areas dedicated to public use.)

SUPERVISION

Each contractor working on a site under the control of the Company shall nominate individuals to take specific responsibility for the implementation of safety management controls insofar as they may influence or impinge upon the contractor's scope of works and area of work.

The appointed supervisor must:

- (a) be trained in basic safety management techniques
- (b) understand the development and requirements of the safety management controls applicable to their activities.
- (c) have the authority to upgrade the controls where necessary.

RISK ASSESSMENT

Under the Management of Health & Safety Regulations 1999 if a company employs 5 or more people, employers are required to carry out an assessment of the risks associated with the work activities. If it is found that there are risks which require control measures employers are required to produce a written record which:





- (a) identifies all the hazards in the workplace
- (b) identifies who is at risk
- (c) assesses the severity of the risk
- (d) evaluates the likelihood of the hazard causing harm
- (e) details existing control measures
- (f) assesses the adequacy of these control measures
- (g) identifies any additional control measures required

The risk assessment should be reviewed periodically or whenever there is a significant change in the nature or scale of work activities. Risk assessments shall be specific to the site activity.

Risk Assessments for works being undertaken at the S&R Head Office / Yard must be submitted in advance to the S&R SHEQ Manager for review. Failure to do so will result in a S&R RAMS Document having to be completed on the day before work can proceed.

SAFETY METHOD STATEMENTS

The Company expects a method statement to be produced to accompany risk assessments for all site activities. Additional documentation will be required for the following activities:

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- (a) work in confined spaces (rescue plan)
- (c) lifting operations including with a Hi-AB (Lift plan)
- (e) commissioning of electrical systems (schedule, quality plan)

GENERAL DATA PROTECTION

S&R take Cyber Security and the protection of sensitive / confidential information and data extremely seriously.





We are committed to compliance with all relevant EU and Member State laws in respect of personal data, and the protection of the 'rights and freedoms' of individuals whose information the company collects and processes in accordance with the General Data Protection Regulation (GDPR). As an external organisation we need to ensure you will assist S&R with its obligations regarding data security.

Each Supplier / Subcontractor shall:

- Have a set of policies and processes for managing cyber and information security risks
- Have networks and information systems designed to be resilient to cyber security incidents through the use of system segregation, resource management, disaster recovery plans and secure data backups.
- Provide cyber security & Data Protection training to its staff.
- Restrict user access to information / data to the minimum level necessary for them to undertake their role.
- Comply with GDPR and all applicable Data Protection Laws in the Processing of Data
- Not process data other than that stipulated by the contract, for the purpose of performing the contract
- Take reasonable steps to ensure the reliability of any employee, agent or contractor who may have access to S&R Data, ensuring in each case that access is strictly limited to those individuals who need to know / access the relevant Data, as strictly necessary for the purposes of the agreement
- Ensure compliance with GDPR in the context of individual's duties to the contracted vendor, ensuring that all such individuals are subject to confidentiality undertakings or professional or statutory obligations of confidentiality
- Implement appropriate technical and organisational measures to ensure a level of security appropriate to that risk, including, as appropriate, the measures referred to in Article 32(1) of the GDPR
- Shall provide reasonable assistance to S&R with any data protection impact assessments (DPIA's)
- Shall erase any data at the request of S&R during or upon completion of the contract
- Shall notify S&R without undue delay upon becoming aware of a Data Breach affecting S&R Data, providing S&R with sufficient information to allow the company to meet any obligations to report or inform Data Subjects of the Data Breach under GDPR

S&R Construction Ltd only collect personal data about you which does not include any "special" types of information or "location" based information. This does however include name, address, job title/role, email address etc.

We need to know and will only collect basic personal information from you that we need in order to provide our services. All the personal data that we hold is used for the provision of our service to our clients.

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We do not share it with any third parties except to verify compliance with legal requirements, to aid in recovering bad debts or to counter other criminality.

If at any point you believe that the information we hold on you is incorrect or you wish to see what information we hold about you, you may request to see this information and have it corrected or deleted. Please email enquiries@srconstructionltd.co.uk

If you wish to raise a complaint on how we have handled your personal information, you can contact our SHEQ Manager who will investigate the matter.

SHEQ CONSULTATION / PARTICIPATION

S&R are committed to forming partnerships with our suppliers and subcontractors. This is not a one-way relationship. To this end, we encourage feedback from our suppliers / subcontractors in terms of any concerns that you may have along with suggested changes / improvements that you think would benefit both parties. Such concerns / changes and improvements can be made at any time and should be directed to the S&R SHEQ Manager in the first instance.

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RECEIPT

To be returned to S&R SHEQ Manager.
 Tel: 01384 262883 / 07747 235908
 E-mail: paulswift@srconstructionltd.co.uk
 Address: The Premier Industrial Estate, The Leys, Brockmoor, Brierley Hill, DY5 3UP.

We acknowledge receipt of the S&R Construction:

- Code of Practice for Suppliers & Subcontractors
- Integrated Safety, Health, Environmental and Quality Policy
- Immigration, Asylum and Nationality Policy
- Anti-Bribery & Corruption Policy
- Drugs & Alcohol Policy
- Equal Opportunities Policy
- Corporate & Social Responsibility
- General Data Protection Policy
- Criminal Finance Policy
- Modern Slavery & Human Trafficking Policy
- Fraud Policy
- Communications with Customers Policy
- Whistleblowing Policy
- Sustainability & Carbon Management Policy
- Cyber Security Policy
- Targets and KPI's

PRINT NAME: _____

SIGNATURE: _____

EMPLOYED BY: _____

DATE: _____