

**Rowe Advisory UK Ltd Handbook**

**ROWE ADVISORY UK LTD**

**HANDBOOK**

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# Rowe Advisory UK Ltd Handbook

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# Rowe Advisory UK Ltd Handbook

## STAFF HANDBOOK

### 1. INTRODUCTION

1.1 Rowe Advisory is an equal opportunities company. We do not discriminate on the grounds of gender, sexual orientation, marital or civil partner status, pregnancy or maternity, gender reassignment, race, colour, nationality, ethnic or national origin, religion or belief, disability or age.

1.2 Rowe Advisory brings years of experience in the resources sector, leading complex organisations and delivering effective strategies. We have gained a wealth of experience with a strategic view of the market, its needs and opportunities for growth and continuous cost improvements.

1.3 Rowe Advisory is a professional consultancy that works with you to identify, define and understand key issues, offer recommendations, strategies and solutions to your specific needs, with the aim of helping you to realise the maximum value from your assets.

1.4 Our experience and expertise encompass:

- ❖ Major projects in oil and gas and mining sectors
- ❖ Market and industry knowledge and networks
- ❖ Contracts and procurement/supply chain
- ❖ Negotiation and complex dispute resolution
- ❖ Supply chain
- ❖ Global and Local Business development
- ❖ Business Strategy
- ❖ Mergers and Acquisition
- ❖ Human Resources

### 2. FOUNDER AND COMPANY

2.1 Rowe Advisory was formed in late 2013 out of a need within the resources sector for the provision of expert advice in business development, contracts and procurement, tenders, negotiations and reviews, where risk is significant through to full scale implementation to delivery client focused outcomes.

2.2 The company was founded based on a principle of delivery. As the founder, Jody Rowe is pivotal in embodying this principle. Jody brings a strategic view of the market, its needs and potential opportunities for growth and continuous cost improvements and an unrivalled drive to deliver optimum outcomes.

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2.3 Jody is a current Non-Executive Director for Strike Energy Limited having previously held executive roles at BG-QGC, Santos, Rio Tinto and Barrick Gold on mega projects GLNG and QCLNG and large-scale mining projects / operations. Jody is a subject matter expert in oil, gas and mining with an ability to lead business development, contracts & procurement, strategic leadership and transformational projects across small, medium and large entities. This expertise is underpinned by an ability to deal with ambiguity and complexity that often accompanies such high-profile activities.

### 3. AT ROWE ADVISORY WE PROVIDE THE FOLLOWING SERVICES TO OUR CLIENTS:

- ❖ Contracts and Procurement
  - ✓ end to end strategic procurement
  - ✓ cost reduction and procurement function transformation
  - ✓ planning contracts and procurement
  - ✓ evaluating offers
  - ✓ contract management and administration
  - ✓ change management
  - ✓ approaching the market
  - ✓ contracting suppliers
  - ✓ transformation
  - ✓ planning and establishing a network
  - ✓ develop mentoring program
  - ✓ external industry network program
- ❖ Supply Chain
  - ✓ supply chain strategy
  - ✓ supply chain optimization
- ❖ Business Development
  - ✓ creating Long Term value
  - ✓ business analysis
  - ✓ approaching the market
  - ✓ planning business development
- ❖ Local Content & small to medium enterprise development
  - ✓ local content strategy
  - ✓ industry and local government networks
- ❖ Human Resources and Recruitment
  - ✓ Human resources strategy, planning, development and training
  - ✓ Health and Safety professionals
- ❖ Projects services and controls personnel

3.1 At Rowe Advisory, our team's behaviours are very important. Supporting our client-focused strategy is a strong set of embedded values that are reflected in our behaviour in both a professional and personal setting:

- ❖ *Delivering* on our commitments
- ❖ *Achieving quality* in all that we do.

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- ❖ Completely understanding our Clients' needs and *exceeding expectations*.
- ❖ Being recognised as *leaders* in our field
- ❖ *Collaboration* to deliver best outcomes for clients, individuals and the organisation.
- ❖ Pursuing personal, team and business *excellence*.
- ❖ Understand that *respect* is the foundation of all good relationships, including clients and co-workers.
- ❖ Practice and promote *empathy* to help encourage others; and
- ❖ Be *genuine* in everything they do.

### 4. LOYALTY IN LIFE IS KEY.

4.1 Our Vision is to be among the most respected resources advisory firms in the World providing advice, support and assurance to help clients realise the maximum value from their assets through:

- ❖ Consistently high quality.
- ❖ Innovation.
- ❖ Integrity.
- ❖ Reliability; and
- ❖ Value.

### 5. USING THE STAFF HANDBOOK

5.1 This Staff Handbook sets out the main policies and procedures that you will need to be aware of while working for us. You should always familiarise yourself with it and comply with it. Any questions you may have about its contents or what you must do to comply with it should be referred to a director.

5.2 The policies and procedures set out in this handbook apply to all employees unless otherwise indicated. They therefore apply to managers, officers, directors, employees, consultants, contractors, trainees, part-time and fixed-term employees, casual and agency staff (collectively referred to as **staff** in this handbook). They do **not** form part of the terms of your contract with us, which are provided to you separately. Your contract sets out your job title, hours and place of work, probationary period, salary, holidays and holiday pay, sickness absence reporting procedure and sick pay, your entitlement to and obligation to give notice to terminate your contract and the duties of confidentiality and restrictions that continue to apply after the termination of your contract.

### 6. RESPONSIBILITY FOR THE STAFF HANDBOOK

6.1 Our board of directors has overall responsibility for this Staff Handbook and for ensuring that its policies and procedures comply with our legal obligations.

6.2 The Staff Handbook is reviewed regularly to ensure that its provisions continue to meet our legal obligations and reflect best practice.

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6.3 Everyone should ensure that they take the time to read and understand the content of this handbook and act in accordance with its aims and objectives. The Directors must ensure all staff understand the standards of behaviour expected of them and to act when behaviour falls below those requirements.

### **7. PERSONAL DETAILS, HOME ADDRESS AND NEXT OF KIN**

7.1 Lisa Rowe Finance and Administration is responsible for maintaining up-to-date details of the home address, next of kin and emergency contact telephone numbers of each member of our staff.

7.2 We will request this information when you start work and you should advise of any changes straight away. Information is held in confidence.

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## Schedule 1 Dress code

### 1. ABOUT THIS POLICY

- 1.1 We encourage everyone to maintain an appropriate standard of dress and personal appearance at work. so that we:
- (a) promote a positive and professional image.
  - (b) respect the needs of men and women from all cultures and religions.
  - (c) make any adjustments that may be needed because of disability.

### 2. APPEARANCE

- 2.1 While working for us you represent us with clients and the public. Your appearance contributes to our reputation and the development of our business and you should maintain a professional image.

### 3. RELIGIOUS AND CULTURAL DRESS

- 3.1 You may wear appropriate religious and cultural dress (including head scarves, skullcaps and turbans) unless it creates a health and safety risk to you or any other person or otherwise breaches this policy.
- 3.2 Where necessary a director can give further information and guidance on cultural and religious dress in the workplace.
- 3.3 Priority is always given to health and safety requirements. Where necessary, advice will be taken from a director.



## Schedule 2 Expenses policy

### 1. ABOUT THIS POLICY

- 1.1 This policy deals with claims for reimbursement of expenses, including travel, accommodation and hospitality.
- 1.2 This policy does not form part of any employee's contract of employment and we may amend it at any time.

### 2. REIMBURSEMENT OF EXPENSES

- 2.1 We will reimburse expenses properly incurred in accordance with this policy. Any attempt to claim expenses fraudulently or otherwise in breach of this policy may result in disciplinary action.
- 2.2 Expenses will only be reimbursed if they are:
  - (a) submitted to the Accounts Department on the appropriate claim form;
  - (b) submitted within 30 days of being incurred;
  - (c) supported by relevant documents (for example, VAT receipts, tickets, and credit or debit card slips); and
  - (d) authorised in advance where required.
- 2.3 Claims for authorised expenses submitted in accordance with this policy will be paid directly into your bank/building society account.

### 3. TRAVEL EXPENSES

- 3.1 We will reimburse the reasonable cost of necessary travel in connection with our business. The most economic means of travel should be chosen if practicable. The following are not treated as travel in connection with our business:
  - (a) travel between your home and usual place of work;
  - (b) travel which is mainly for your own purposes; and
  - (c) travel which, while undertaken on our behalf, is similar or equivalent to travel between your home and your usual place of work.
- 3.2 **Trains.** We will reimburse the cost of travel on submission of a receipt with an expenses claim form.
- 3.3 **Car.** Where it is cost effective for you to use your car for business travel, and you have been authorised to do so, you can claim a fuel usage allowance on proof. You

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can also claim for any necessary parking costs which must be supported by a receipt or the display ticket.

3.4 **Air travel.** If you are required to travel by plane in the course of your duties, you should discuss travel arrangements with a director in advance.

3.5 We will not reimburse penalty fares or fines for parking or driving offences, other than at our discretion in exceptional circumstances.

### 4. ACCOMMODATION AND OTHER OVERNIGHT EXPENSES

4.1 If you are required to stay away overnight in the course of your duties, we will reimburse the cost on submission of a receipt with an expenses claim form, you should discuss travel arrangements with a director in advance.

### 5. ENTERTAINING CLIENTS

5.1 You may entertain actual or prospective clients; you should discuss arrangements with a director in advance.

5.2 You must also ensure that the provision of any such hospitality in the circumstances complies with our Anti-Corruption and Bribery Policy.

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## Schedule 3 Equal opportunities policy

### 1. EQUAL OPPORTUNITIES STATEMENT

Rowe Advisory Ltd is committed to promoting equal opportunities in employment. You and any job applicants will receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (**Protected Characteristics**).

### 2. ABOUT THIS POLICY

2.1 This policy sets out our approach to equal opportunities and the avoidance of discrimination at work. It applies to all aspects of employment with us, including recruitment, pay and conditions, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.

2.2 This policy does not form part of any employee's contract of employment and we may amend it at any time.

### 3. DISCRIMINATION

3.1 You must not unlawfully discriminate against or harass other people including current and former employees, job applicants, clients, customers, suppliers and visitors. This applies in the workplace, outside the workplace (when dealing with clients, suppliers or other work-related contacts), and on work-related trips or events including social events.

3.2 The following forms of discrimination are prohibited under this policy and are unlawful:

- (a) **Direct discrimination:** treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or because they might be gay.
- (b) **Indirect discrimination:** a provision, criterion or practice that applies to everyone but adversely affects people with a Protected Characteristic more than others and is not justified. For example, requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.
- (c) **Harassment:** this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt with further in our Anti-harassment and Bullying Policy.

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- (d) **Victimisation:** retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.
- (e) **Disability discrimination:** this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

### 4. RECRUITMENT AND SELECTION

- 4.1 Recruitment, promotion and other selection exercises such as redundancy selection will be conducted based on merit, against objective criteria that avoid discrimination. Shortlisting should be done by more than one person if possible.
- 4.2 Vacancies should generally be advertised to a diverse section of the labour market. Advertisements should avoid stereotyping or using wording that may discourage groups from applying.
- 4.3 Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.
- 4.4 Job applicants should not be asked about health or disability before a job offer is made, except in the very limited circumstances allowed by law: for example, to check that the applicant could perform an intrinsic part of the job (taking account of any reasonable adjustments), or to see if any adjustments might be needed at interview because of a disability. Where necessary, job offers can be made conditional on a satisfactory medical check. Health or disability questions may be included in equal opportunities monitoring forms, which must not be used for selection or decision-making purposes.

### 5. DISABILITIES

If you are disabled or become disabled, we encourage you to tell us about your condition so that we can consider what reasonable adjustments or support may be appropriate.

### 6. BREACHES OF THIS POLICY

- 6.1 We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Procedure. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal.
- 6.2 If you believe that you have suffered discrimination you can raise the matter through our Grievance Procedure or Anti-harassment and Bullying Policy. Complaints will be treated in confidence and investigated as appropriate.

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- 6.3 You must not be victimised or retaliated against for complaining about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our Disciplinary Procedure.

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## Schedule 4 Anti-harassment and bullying policy

### 1. ABOUT THIS POLICY

- 1.1 Rowe Advisory Ltd is committed to providing a working environment free from harassment and bullying and ensuring all staff are treated, and treat others, with dignity and respect.
- 1.2 This policy covers harassment or bullying which occurs at work and out of the workplace, such as on business trips or at work-related events or social functions. It covers bullying and harassment by staff (which may include consultants, contractors and agency workers) and by third parties such as clients, suppliers or visitors to our premises.
- 1.3 This policy does not form part of any employee's contract of employment and we may amend it at any time.

### 2. WHAT IS HARASSMENT?

- 2.1 Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment.
- 2.2 It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.
- 2.3 Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation. Harassment is unacceptable even if it does not fall within any of these categories.
- 2.4 Harassment may include, for example:
  - (a) unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing;
  - (b) unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless);
  - (c) offensive e-mails, text messages or social media content;
  - (d) mocking, mimicking or belittling a person's disability.

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- 2.5 A person may be harassed even if they were not the intended "target". For example, a person may be harassed by racist jokes about a different ethnic group if the jokes create an offensive environment.

### 3. WHAT IS BULLYING?

- 3.1 Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority but can include both personal strength and the power to coerce through fear or intimidation.
- 3.2 Bullying can take the form of physical, verbal and non-verbal conduct. Bullying may include, by way of example:
- (a) physical or psychological threats;
  - (b) overbearing and intimidating levels of supervision;
  - (c) inappropriate derogatory remarks about someone's performance;
- 3.3 Legitimate, reasonable and constructive criticism of a worker's performance or behaviour, or reasonable instructions given to workers in the course of their employment, will not amount to bullying on their own.

### 4. IF YOU ARE BEING HARASSED OR BULLIED

- 4.1 If you are being harassed or bullied, consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome or makes you uncomfortable. If this is too difficult or embarrassing, you should speak to a director, who can provide confidential advice and assistance in resolving the issue formally or informally.
- 4.2 If informal steps are not appropriate, or have not been successful, you should raise the matter formally under our Grievance Procedure.
- 4.3 We will investigate complaints in a timely and confidential manner. The investigation will be conducted by someone with appropriate experience and no prior involvement in the complaint, where possible. Details of the investigation and the names of the person making the complaint and the person accused must only be disclosed on a "need to know" basis. We will consider whether any steps are necessary to manage any ongoing relationship between you and the person accused during the investigation.
- 4.4 Once the investigation is complete, we will inform you of our decision. If we consider you have been harassed or bullied by an employee, the matter will be dealt with under the Disciplinary Procedure as a case of possible misconduct or gross

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misconduct. If the harasser or bully is a third party such as a customer or other visitor, we will consider what action would be appropriate to deal with the problem. Whether or not your complaint is upheld, we will consider how best to manage any ongoing working relationship between you and the person concerned.

### **5. PROTECTION AND SUPPORT FOR THOSE INVOLVED**

Staff who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under our Disciplinary Procedure.

### **6. RECORD-KEEPING**

Information about a complaint by or about an employee may be placed on the employee's personnel file, along with a record of the outcome and of any notes or other documents compiled during the process. These will be processed in accordance with our GDPR policy.



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## Schedule 5 Anti-corruption and bribery policy

### 1. ABOUT THIS POLICY

- 1.1 It is our policy to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships.
- 1.2 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.
- 1.3 This policy does not form part of any employee's contract of employment and we may amend it at any time. It will be reviewed regularly.

### 2. WHO MUST COMPLY WITH THIS POLICY?

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

### 3. WHAT IS BRIBERY?

- 3.1 **Bribe** means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.
- 3.2 **Bribery** includes offering, promising, giving, accepting or seeking a bribe.
- 3.3 All forms of bribery are strictly prohibited. If you are unsure about whether an act constitutes bribery, raise it with a director.
- 3.4 Specifically, you must not:
  - (a) give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
  - (b) accept any offer from a third party that you know, or suspect is made with the expectation that we will provide a business advantage for them or anyone else;
  - (c) give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;

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- 3.5 You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

### **4. GIFTS AND HOSPITALITY**

- 4.1 This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services.
- 4.2 A gift or hospitality will not be appropriate if it is unduly lavish or extravagant or could be an inducement or reward for any preferential treatment (for example, during contractual negotiations).
- 4.3 Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers) or be given in secret. Gifts must be given in our name, not your name.
- 4.4 Promotional gifts of low value such as branded stationery may be given to or accepted from existing customers, suppliers and business partners.

### **5. RECORD-KEEPING**

- 5.1 You must declare and keep a written record of all hospitality or gifts given or received. You must also submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure.
- 5.2 All accounts, invoices, and other records relating to dealings with third parties including suppliers and clients should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

### **6. HOW TO RAISE A CONCERN**

If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify a director as soon as possible.

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## Schedule 6 Whistleblowing policy

### 1. ABOUT THIS POLICY

- 1.1 We are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.
- 1.2 This policy covers all employees, officers, consultants, contractors, casual workers and agency workers.
- 1.3 This policy does not form part of any employee's contract of employment and we may amend it at any time.

### 2. WHAT IS WHISTLEBLOWING?

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

### 3. HOW TO RAISE A CONCERN

- 3.1 We hope that in many cases you will be able to raise any concerns with your manager. However, where you prefer not to raise it with your manager for any reason, you should contact a director.
- 3.2 We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

### 4. CONFIDENTIALITY

We hope that you will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

### 5. EXTERNAL DISCLOSURES

- 5.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

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5.2 The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external. Public Concern at Work operates a confidential helpline. Their contact details are at the end of this policy.

### 6. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

6.1 We aim to encourage openness and will support whistle-blowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

6.2 Whistle-blowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform a director immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

6.3 You must not threaten or retaliate against whistle-blowers in any way. If you are involved in such conduct you may be subject to disciplinary action.

6.4 However, if we conclude that a whistle-blower has made false allegations maliciously or with a view to personal gain, the whistle-blower may be subject to disciplinary action.

6.5 Public Concern at Work operates a confidential helpline. Their contact details are at the end of this policy.

### 7. CONTACT

<b>Public Concern at Work</b> (Independent whistleblowing charity)	Helpline: (020) 7404 6609 E-mail: <a href="mailto:whistle@pcaw.co.uk">whistle@pcaw.co.uk</a> Website: <a href="http://www.pcaw.co.uk">www.pcaw.co.uk</a>
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# Rowe Advisory UK Ltd Handbook

## Schedule 7 Health and safety policy

### 1. ABOUT THIS POLICY

- 1.1 This policy sets out our arrangements for ensuring we meet our health and safety obligations to staff, and anyone visiting our premises or affected by our work.
- 1.2 Jody Rowe CEO has overall responsibility for health and safety and the operation of this policy.
- 1.3 This policy does not form part of any employee's contract of employment and we may amend it at any time. We will continue to review this policy to ensure it is achieving its aims.

### 2. YOUR RESPONSIBILITIES

- 2.1 All staff share responsibility for achieving safe working conditions. You must take care of your own health and safety and that of others, observe applicable safety rules and follow instructions for the safe use of equipment.
- 2.2 You should report any health and safety concerns immediately to a director.
- 2.3 You must co-operate on health and safety matters, including the investigation of any incident.
- 2.4 Failure to comply with this policy may be treated as misconduct and dealt with under our Disciplinary Procedure.

### 3. INFORMATION AND CONSULTATION

We will inform and consult directly with all staff regarding health and safety matters.

### 4. TRAINING

- 4.1 We will ensure that you are given adequate training and supervision to perform your work competently and safely.
- 4.2 Staff will be given a health and safety induction and provided with appropriate safety training.

### 5. EQUIPMENT

You must use equipment in accordance with any instructions given to you. Any equipment fault or damage must immediately be reported to a director. Do not attempt to repair equipment unless trained to do so.

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### **6. ACCIDENTS AND FIRST AID**

- 6.1 Details of first aid facilities and the names of trained first aiders are displayed on the notice boards.
- 6.2 All accidents and injuries at work, however minor, should be reported to a director and recorded in the Accident Book.

### **7. FIRE SAFETY**

- 7.1 All staff should familiarise themselves with the fire safety instructions, which are displayed on notice boards and near fire exits in the workplace.
- 7.2 If you hear a fire alarm, leave the building immediately by the nearest fire exit and go to the fire assembly point shown on the fire safety notices.
- 7.3 Fire drills will be held at least every 12 months and must be taken seriously. We also carry out regular fire risk assessments and regular checks of fire extinguishers, fire alarms, escape routes and emergency lighting.

### **8. RISK ASSESSMENTS AND MEASURES TO CONTROL RISK**

We carry out general workplace risk assessments periodically. The purpose is to assess the risks to health and safety of employees, visitors and other third parties as a result of our activities, and to identify any measures that need to be taken to control those risks.

### **9. COMPUTERS AND DISPLAY SCREEN EQUIPMENT**

- 9.1 If you use a computer screen or other display screen equipment (DSE) as a significant part of your work, you are entitled to a workstation assessment and regular eyesight tests by an optician at our expense.
- 9.2 Further information on workstation assessments, eye tests and the use of DSE can be obtained from a director.

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## Schedule 8 Smoking policy

### 1. ABOUT THIS POLICY

- 1.1 We are committed to protecting your health, safety and welfare and that of all those who work for us by providing a safe place of work and protecting all workers, clients and visitors from exposure to smoke.
- 1.2 All our workplaces (including our vehicles) are smoke-free in accordance with the Health Act 2006 and associated regulations. All staff and visitors have the right to a smoke-free environment.
- 1.3 This policy does not form part of any employee's contract of employment and it may be amended at any time.
- 1.4 If you wish to suggest improvements to the policy or have trouble complying with it, you should discuss the situation with a director.

### 2. WHERE IS SMOKING BANNED?

- 2.1 Smoking is not permitted anywhere in our workplace. The ban applies to anything that can be smoked and includes, but is not limited to, cigarettes, electronic cigarettes, pipes, cigars and herbal cigarettes.

### 3. WHERE IS SMOKING PERMITTED?

You may only smoke outside during breaks. When smoking outside, you must dispose of cigarette butts and other litter appropriately.

### 4. BREACHES OF THE POLICY

- 4.1 Breaches of this policy by any employee will be dealt with under our Disciplinary Procedure and, in serious cases, may be treated as gross misconduct leading to summary dismissal.
- 4.2 Smoking in smoke-free premises or vehicles is also a criminal offence and may result in a fixed penalty fine and/or prosecution.

# Rowe Advisory UK Ltd Handbook

## Schedule 9 IT and communications systems policy

### 1. ABOUT THIS POLICY

- 1.1 Our IT and communications systems are intended to promote effective communication and working practices. This policy outlines the standards you must observe when using these systems, when we will monitor their use, and the action we will take if you breach these standards.
- 1.2 Jody Rowe CEO has overall responsibility for this policy, including keeping it under review.
- 1.3 Breach of this policy may be dealt with under our Disciplinary Procedure and, in serious cases, may be treated as gross misconduct leading to summary dismissal.
- 1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

### 2. EQUIPMENT SECURITY AND PASSWORDS

- 2.1 You are responsible for the security of the equipment allocated to or used by you, and you must not allow it to be used by anyone other than in accordance with this policy. You should use passwords on all IT equipment, particularly items that you take out of the office. You should keep your passwords confidential and change them regularly.
- 2.2 You must only log on to our systems using your own username and password. You must not use another person's username and password or allow anyone else to log on using your username and password.
- 2.3 If you are away from your desk you should log out or lock your computer. You must log out and shut down your computer at the end of each working day unless otherwise instructed.

### 3. SYSTEMS AND DATA SECURITY

- 3.1 You should not delete, destroy or modify existing systems, programs, information or data (except as authorised in the proper performance of your duties).
- 3.2 You must not download or install software from external sources without authorisation. Downloading unauthorised software may interfere with our systems and may introduce viruses or other malware.
- 3.3 You must not attach any device or equipment including mobile phones, tablet computers or USB storage devices to our systems without authorisation.



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3.4 We monitor all e-mails passing through our system for viruses. You should exercise caution when opening unsolicited e-mails from unknown sources. If an e-mail looks suspicious do not reply to it, open any attachments or click any links in it.

### 4. E-MAIL

4.1 Adopt a professional tone and observe appropriate etiquette when communicating with third parties by e-mail. You should also include our standard e-mail signature and disclaimer.

4.2 Remember that e-mails can be used in legal proceedings and that even deleted e-mails may remain on the system and be capable of being retrieved.

4.3 You must not send abusive, obscene, discriminatory, racist, harassing, derogatory, defamatory, pornographic or otherwise inappropriate e-mails.

4.4 You should not:

- (a) send or forward private e-mails at work which you would not want a third party to read.
- (b) send or forward chain mail, junk mail, cartoons, jokes or gossip.
- (c) contribute to system congestion by sending trivial messages or unnecessarily copying or forwarding e-mails to others who do not have a real need to receive them; or
- (d) send messages from another person's e-mail address (unless authorised) or under an assumed name.

4.5 Do not use your own personal e-mail account to send or receive e-mail for the purposes of our business. Only use the e-mail account we have provided for you.

4.6 We do not permit access to web-based personal e-mail such as Gmail or Hotmail on our computer systems at any time due to additional security risks.

4.7 All clients should be given the option of opting into password protected documents. If a password is agreed with the recipient, then this can be used as the standard password for that client. The standard password should be stored in the client database.

4.8 No external emails should contain bank accounts or other sensitive data in the body of the email.

4.9 All document attachments containing sensitive data, sent externally by email should be password protected.

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### **5. USING THE INTERNET**

- 5.1 Internet access is provided primarily for business purposes. Occasional personal use may be permitted as set out in paragraph 6.
- 5.2 You should not access any web page or download any image or other file from the internet which could be regarded as illegal, offensive, in bad taste or immoral. Even web content that is legal in the UK may be in enough bad taste to fall within this prohibition. As a general rule, if any person (whether intended to view the page or not) might be offended by the contents of a page, or if the fact that our software has accessed the page or file might be a source of embarrassment if made public, then viewing it will be a breach of this policy.
- 5.3 We may block or restrict access to some websites at our discretion.

### **6. PERSONAL USE OF OUR SYSTEMS**

- 6.1 We permit the incidental use of our systems to browse the internet and make personal telephone calls subject to certain conditions. Personal use is a privilege and not a right. It must not be overused or abused. We may withdraw permission for it at any time or restrict access at our discretion.
- 6.2 Personal use must meet the following conditions:
- (a) it must be minimal and take place substantially outside of normal working hours (that is, during your lunch break, and before or after work).
  - (b) personal e-mails should be labelled "personal" in the subject header.
  - (c) it must not affect your work or interfere with business or office commitments; and
  - (d) it must comply with our policies including the Equal Opportunities Policy, Anti-harassment and Bullying Policy, Data Protection Policy and Disciplinary Procedure.

### **7. MONITORING**

- 7.1 Our systems enable us to monitor telephone, e-mail, voicemail, internet and other communications. For business reasons, and in order to carry out legal obligations in our role as an employer, your use of our systems including the telephone and computer systems (including any personal use) may be continually monitored by automated software or otherwise.
- 7.2 We reserve the right to retrieve the contents of e-mail messages or check internet usage (including pages visited and searches made) as reasonably necessary in the

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interests of the business, including for the following purposes (this list is not exhaustive):

- (a) to monitor whether the use of the e-mail system or the internet is legitimate and in accordance with this policy.
- (b) to find lost messages or to retrieve messages lost due to computer failure.
- (c) to assist in the investigation of alleged wrongdoing; or
- (d) to comply with any legal obligation.

### **8. PROHIBITED USE OF OUR SYSTEMS**

8.1 Misuse or excessive personal use of our telephone or e-mail system or inappropriate internet use will be dealt with under our Disciplinary Procedure. Misuse of the internet can in some cases be a criminal offence.

8.2 Creating, viewing, accessing, transmitting or downloading any of the following material will usually amount to gross misconduct (this list is not exhaustive):

- (a) pornographic material (that is, writing, pictures, films and video clips of a sexually explicit or arousing nature).
- (b) offensive, obscene, or criminal material or material which is liable to cause embarrassment to us or to our clients.
- (c) a false and defamatory statement about any person or organisation.
- (d) material, which is discriminatory, offensive, derogatory or may cause embarrassment to others (including material which breaches our Equal Opportunities Policy or our Anti-harassment and Bullying Policy);
- (e) confidential information about us or any of our staff or clients (except as authorised in the proper performance of your duties).
- (f) unauthorised software.
- (g) any other statement which is likely to create any criminal or civil liability (for you or us); or
- (h) music or video files or other material in breach of copyright.

## Schedule 10 Social media policy

### 8. ABOUT THIS POLICY

- 1.1. This policy is intended to help staff and contractors (where these are employed to update or create posts for the firm) make appropriate decisions about the use of social media such as blogs, wikis, social networking websites, podcasts, forums, message boards, or comments on web-articles, such as Twitter, Facebook, LinkedIn etc.
- 1.2. This policy outlines the minimum standards we require staff to observe when using social media, the circumstances in which we will monitor your use of social media and the action we will take in respect of breaches of this policy.
- 1.3. This policy does not form part of any contract of employment and it may be amended by the firm at any time.

### 2. WHO DOES THIS POLICY APPLY TO?

- 2.1. This policy covers all individuals working at all levels and grades, including senior managers, officers, directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term employees, casual and agency staff and volunteers (these are collectively referred to as "staff" in this policy).

### 3. THE SCOPE OF THE POLICY

- 3.1. All staff are always expected to comply with this policy to protect the privacy, confidentiality, and interests of our company and our services, employees, partners, customers, and competitors.
- 3.2. Breach of this policy may be dealt with under our Disciplinary Procedure and, in serious cases, may be treated as gross misconduct leading to summary dismissal.

### 4. RESPONSIBILITY FOR IMPLEMENTATION OF THE POLICY

- 4.1. Jody Rowe CEO has overall responsibility for the effective operation of this policy.
- 4.2. Jody Rowe CEO is responsible for monitoring and reviewing the operation of this policy and making recommendations for changes to minimise risks to our operations.
- 4.3. All staff are responsible for their own compliance with this policy and for ensuring that it is consistently applied. All staff should ensure that they take the time to read and understand it. Any breach of this policy should be reported to a director.

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4.4. Questions regarding the content or application of this policy should be directed to Jody Rowe CEO.

### 5. USING SOCIAL MEDIA SITES IN OUR NAME

5.1. Only authorised persons are permitted to post material on a social media website in our name and on our behalf. Any breach of this restriction will amount to gross misconduct.

### 7. USING SOCIAL MEDIA

7.1. We recognise the importance of the internet in shaping public thinking about our company and our services, employees, directors, business partners and customers. We also recognise the importance of our staff joining in and helping shape industry commentary and direction through interaction in social media.

7.2. You are therefore permitted to interact on approved social media websites about general industry developments.

7.3. Before using social media, you must:

- (a) have read and understood this policy.
- (b) have sought and gained prior written approval to do so from a director.

### 8. PERSONAL USE OF SOCIAL MEDIA SITES AND USING THE FIRM'S EQUIPMENT TO ACCESS SOCIAL MEDIA SITES

8.1. We permit the incidental use of social media websites for personal use subject to certain conditions set out below. However, this is a privilege and not a right. It must neither be abused nor overused, and we reserve the right to withdraw our permission at any time at our entire discretion.

8.2. The following conditions must be met for **personal use** to continue:

- (a) use must be minimal and take place substantially out of normal working hours (that is, during lunch hours, before 9 am or after 5.30 pm).
- (b) use must not breach any of the rules set out in paragraph 9 below.
- (c) use must not interfere with business or office commitments.
- (d) use must comply with our policies such as the firm's Equal Opportunities Policy, Anti-Harassment Policy, GDPR Policy, and Disciplinary Procedures.

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### 9. RULES FOR USE OF SOCIAL MEDIA.

- 9.1. Always write in the first person, identify who you are and what your role is, and except for Twitter or similar character restricted posts, use the following disclaimer “The views expressed are my own and don’t reflect the views of my employer”.
- 9.2. Do not upload, post, forward or post a link to any abusive, obscene, discriminatory, harassing, derogatory or defamatory content.
- 9.3. Any member of staff who feels that they have been harassed or bullied or are offended by material posted or uploaded by a colleague onto a social media website on the firm’s behalf should inform a director.
- 9.4. Never disclose commercially sensitive, anti-competitive, private or confidential information. If you are unsure whether the information you wish to share falls within one of these categories, you should discuss this a director.
- 9.5. Do not upload, post or forward any content belonging to a third party unless you have that third party's consent. If the material is by way of a re-tweet, please see 9.23 for further guidance.
- 9.6. It is acceptable to quote a small excerpt from an article, particularly for the purposes of commenting on it or criticising it. However, if you think an excerpt is too big, it probably is. Quote accurately, include references and when in doubt, link, don't copy.
- 9.7. Before you include a link to a third party website, check that any terms and conditions of that website permit you to link to it. All links must be done so that it is clear to the user that they have moved to the third party's website.
- 9.8. When making use of any social media platform, you must read and comply with its terms of use.
- 9.9. Do not post, upload, forward or post a link to chain mail, junk mail, cartoons (as these may be subject to copyright), inappropriate jokes or gossip.
- 9.10. Be honest and open but be mindful of the impact your contribution might make to people’s perceptions of us as a firm. If you make a mistake in a contribution, be prompt in admitting and correcting it. Such corrections should be advised to a director together with details of the original contribution.

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- 9.11. You are personally responsible for content you publish into social media tools – be aware that what you publish will be public for many years.
- 9.12. Don't escalate heated discussions, try to be conciliatory, respectful and quote facts to lower the temperature and correct misrepresentations. Never contribute to a discussion if you are angry or upset, return to it later when you can contribute in a calm and rational manner.
- 9.13. If you feel even slightly uneasy about something you are about to publish, then you shouldn't do it. If in doubt, always discuss it with a director.
- 9.14. Don't discuss colleagues, competitors, customers or suppliers without their prior approval.
- 9.15. Always consider others' privacy and avoid discussing topics that may be inflammatory e.g. politics, sexual orientation, race and religion.
- 9.16. Avoid publishing your contact details where they can be accessed and used widely by people you did not intend to see them, and never publish anyone else's contact details.
- 9.17. Before your first contribution on any social media site, observe the activity on the site for a while before launching in yourself to get a feel for the style of contributions, the nature of the content and any 'unwritten' rules that other contributors might follow.
- 9.18. Activity on social media websites during office hours should complement and/or support your role and should be used in controlled moderation.
- 9.19. If you notice any content posted on social media about us (whether complementary or critical) please report it to a director.
- 9.21. Risk warnings must be given enough prominence, even in short messages and banner promotions.
- 9.22. When using Twitter be aware that although images can be permanently visible, some systems enable user to turn off this functionality so that the image only appears as a link. Any risk warnings or other information that must be included in the promotion must therefore appear not only in the image.

### **10. MONITORING USE OF SOCIAL MEDIA WEBSITES**

- 10.1 Staff should be aware that any use of social media websites (whether or not accessed for work purposes using firm equipment or on firm's time) may be

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monitored and, where breaches of this policy are found, action may be taken under our Disciplinary Procedure.

- 10.2 We reserve the right to restrict or prevent access to certain social media websites if we consider personal use to be excessive. Monitoring is only carried out to the extent permitted or as required by law and as necessary and justifiable for business purposes.
- 10.3 Misuse of social media websites can, in certain circumstances, constitute a criminal offence or otherwise give rise to legal or regulatory liability against you and us. It may also cause embarrassment to us and to our clients.
- 10.4 Uploading, posting forwarding or posting a link to any of the following types of material on a social media website, whether in a professional or personal capacity, will amount to gross misconduct (this list is not exhaustive):
- (a) pornographic material (that is, writing, pictures, films and video clips of a sexually explicit nature).
  - (b) a false and defamatory statement about any person or organisation.
  - (c) material, which is offensive, obscene, criminal discriminatory, derogatory or may cause embarrassment to us, our clients or our staff;
  - (d) confidential information about us or any of our staff or clients (which you do not have express authority to disseminate).
  - (e) any other statement which is likely to create any liability (whether criminal or civil, and whether for you or us); or
  - (f) material in breach of copyright or other intellectual property rights, or which invades the privacy of any person.

Any such action will be addressed under the Disciplinary Procedure and is likely to result in summary dismissal.

- 10.5. Where evidence of misuse is found we may undertake a more detailed investigation in accordance with our Disciplinary Procedure, involving the examination and disclosure of monitoring records to those nominated to undertake the investigation and any witnesses or managers involved in the investigation. If necessary, such information may be handed to the police in connection with a criminal investigation.
- 10.6. If you notice any use of social media by other members of staff in breach of this policy, please report it to a director.

### **11. MONITORING AND REVIEW OF THIS POLICY**

- 11.1 Jody Rowe CEO shall be responsible for reviewing this policy on an annual basis to ensure that it meets legal requirements and reflects best practice.



# Rowe Advisory UK Ltd Handbook

## Declaration

You must read all the policies contained in this document and listed below. Company policies are a part of your contract and therefore must be read and understood to ensure you are fully aware of your responsibilities in working with **Rowe** Advisory. Please read and tick off each of these policies to indicate you are aware of the rules and responsibilities you have whilst employed by **Rowe** Advisory.

## Declaration:

I have read and understand the contents of the Rowe Advisory UK Ltd Handbook along with the above policies and I agree to the terms of conditions of these documents.

Name:	
Signature:	
Date:	

