







Human Traffic & Anti Slavery Policy

Slavery and Human Trafficking Statement

Balloo Hire Centres Ltd and its associated companies are committed to improving their practices to combat slavery and human trafficking.

Company Structure

As one of the biggest hire companies in the Northern and Southern economies of Ireland, we cross the border daily from the Republic of Ireland to Northern Ireland and vice versa. We have 7 depots and associated sites, with staff directly employed in the UK.

Our Suppliers

Our suppliers are from around the world, USA, Canada, France, Germany, Japan and dealerships within NI and the UK. They all take the issue of human trafficking and slavery seriously and strive to make sure no human trafficking or slavery is taking place within the supply chain.

Our Policies on Human Trafficking and Slavery

We are committed to making Sure there is no modern slavery or human trafficking within our supply chains and in any part of our business or associated businesses, We strive to work ethically, and will put control measures in place to ensure no slavery or human trafficking is taking place.

If it is suspected that a supplier or customer is partaking in slavery or human trafficking, we will suspend all business relationships with that company and report to the authorities.

Our statement above is not exhaustive and more information can be found on by reading the Modern Slavery Act 2015.

Dan McCaffrey

Divisional Director

Reviewed January 2024













Asbestos Policy

INTRODUCTION

Balloo Hire Centres is committed to ensuring the health, safety and welfare of those who may be affected by its acts or omissions and recognises its responsibilities under the Control of Asbestos Regulations 2005 and will take account of all related Approved Codes of Practice and Guidance.

Within this policy asbestos refers to any fibrous form of:

Crocidolite — blue asbestos Amosite — brown asbestos Chrysotile —white asbestos Anthophyllite Tremolite Actinolite

And any mixture which contains one or more of the above.

The presence of asbestos containing materials (ACMs) does not in itself constitute a danger. However, it is hazardous when disturbed or damaged and must be treated accordingly. Activities which give rise to airborne dust, e.g. abrasion, breaking, sawing, cutting, drilling or machining ACM's, are most likely to present risks.

Staff and contractors not trained to work with asbestos are not expected to work with or be exposed to asbestos on Company

ASBESTOS POLICY STATEMENT

The Company will:

- produce an asbestos procedure including the implementation of an effective asbestos containing materials management plan so that appropriate measures, such as monitoring, encapsulation, sealing, labelling, inspection or removal of the material are undertaken;
- periodically review this policy and the procedures in the light of any legal changes, further information or incidents;
- produce and maintain an ACM register for each of its locations and make this available to interested parties and those who may be brought into contact with asbestos as part of their activities;
- promote awareness of the hazards of asbestos and the management procedures through information and training;
- prevent exposure to hazards associated with asbestos.

Responsibility for the implementation of this policy and the management of asbestos is taken by the Health & Safety Manager reporting directly to the Managing Director, as signed below.

Dan McCaffrey **Divisional Director**

Reviewed January 2024













Equal Opportunity Policy

Introduction

Balloo Hire Centres is committed to the elimination of unlawful or unfair discrimination on the grounds of gender, race, disability, ethnic origin, nationality, sexual orientation, martial status, responsibility for dependants. religion, trade union activity and age. It is the Company's intention that the workforce reflects the diversity of the local population and wider society.

To ensure this vision is translated into reality, the Company will take action to eliminate discrimination or harrassment and to promote equality in employment, Therefore, it is the policy of Balloo Hire Centres to:

- Comply with current statutory requirements in this regard.
- Ensure that all employees are aware of the existance of the Equal Opportunities policy.
- · Provide employees with the necessary encouragement, guidance and training to implement the policy.
- Ensure existing and potential employees are aware of their rights and responsibilities under the law.
- Ensure that mechanisms exist for the continuous monitoring of the effectiveness of this policy.
- Develop good practices in areas such as recruitment selection and progression, training and development, terms and conditions of employment and disciplinary, harassment and grievance procedures.
- · Regularly review the policy and any procedures produced under it to ensure their continuing relevance and effectiveness,

This policy will be available internally to all Balloo Hire Centres employees and also made available to our customers, suppliers and other interested parties on the company website.

Dan McCaffrey **Divisional Director**

Reviewed January 2024













Environmental Policy

Balloo Hire Centres endeavours to maintain the highest environmental standards in all its activities and our responsible approach is outlined in the Environmental Policy.

This policy is our contract with the environment and is our continued commitment to complying with legislation, preventing pollution and continual improvement. Its implementation will ensure our environmental obligations and responsibilities are met.

As hirers of plant, tools, and equipment, we will:

Wherever possible, use environmentally considerate methods and materials to fulfil our contractual obligations. Employ appropriate management techniques to ensure all our operations have minimal environmental impact. Guarantee to take particular care in the disposal of all waste products React as appropriate to environmental matters at board level.

As Employers we will:

Consistently seek to increase the awareness of all employees and suppliers of our aim to conserve and, where possible, enhance the environmental in its widest sense.

Dan McCaffrey **Divisional Director**

Reviewed January 2024













Customer Complaint Policy

Balloo Hire Centres is committed to always providing the best possible service that we can. However, we realise that sometimes customers will feel that they have cause to complain about the service they have received. We encourage all feedback from customers, and we aim to resolve all complaints quickly, fairly and effectively.

Therefore, it is the policy of Balloo Hire Centres to:

- · Aim to put things right quickly for our customers when things go wrong.
- · Keep our customers informed of the progress of their complaint and the outcome of any investigation.
- Learn from each complaint to improve our future performance.
- Set performance targets for responding to complaints, and monitor our performance against these targets.

This policy will be available internally to all Balloo Hire Centres employees and also made available to our customers, suppliers and other interested parties on the company website.

Dan McCaffrey **Divisional Director**

Reviewed January 2024











Customer Notice

Customers collecting trailers are required to attach and secure them to their own vehicle. Balloo Hire staff are not to physically attach trailers to customer vehicles, however staff should help and assist customers in this regard where required.

Customers with a trailer or flatbed lorry collecting plant or MEWPS, are to load their own equipment. Balloo Hire staff are not permitted to load (drive).

Dan McCaffrey **Divisional Director**

Reviewed January 2024













Customer Charter Policy

We will be professional and courteous in our dealings with our customers every time, We will always listen to our customers, so that we may better understand their needs and exceed their expectations.

By providing excellent service and advice, our customers will benefit from the most effective solutions for their business.

We will provide a prompt and reliable service regarding the delivery, collection and maintenance of our equipment. Our pricing will be fair and competitive and will deliver value for money to our customers.

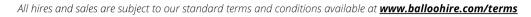
We will communicate openly and effectively with our customers and will provide accurate information to support all

Above all else, we will put our customers' safety first.

Dan McCaffrey **Divisional Director**

transactions.

Reviewed January 2024















Corportate Social Responsibility Policy

At Balloo Hire Centres Ltd, we recognise that we must integrate our business values and operations to meet the expectations of our stakeholders, They include customers, employees, investors, suppliers, the community and the environment.

We recognise that our social, economic and environmental responsibilities to these stakeholders are integral to our business.

We aim to demonstrate these responsibilities through our actions and within our corporate policies. We take seriously all feedback that we receive from our stakeholders and, where possible, maintain open dialogue to ensure that we fulfil the requirements outlined within this policy,

We shall be open and honest in communicating our strategies, targets, performance -and governance to our stakeholders in our continual commitment to sustainable development.

The Managing Director is responsible for the Implementation of this poly and will make the necessary resources available to realise our corporate responsibilities. The responsibility for our performance on this policy rests with all employees throughout the company,

Our partnership focus:

We shall ensure a high level of business performance while minimising and effectively managing risk ensuring that we uphold the values of honesty, partnership and fairness in our relationships with all our stakeholders. Our contracts will clearly set out the agreed terms, conditions and the basis of our relationship and will operate in a way that safeguards against unfair business practices:

- · We shall encourage suppliers and contractors to adopt responsible business policies and practices
- We shall encourage dialogue with local communities for mutual benefit
- We will register and resolve customer complaints in accordance with our standard operating procedures. We shall support
 and encourage our employees to help local community organisations and activities in our region, particularly our employee
 chosen charities
- We shall operate an equal opportunities policy for all present and potential future employees and will offer our employees clear and fair terms of employment and provide resources to enable their continual development
- We shall maintain a clear and fair employee remuneration policy and shall maintain forums for employee consultation and business involvement.
- We shall provide safeguards to ensure that all employees of whatever nationality, colour, race or religious belief are treated with respect and without sexual, physical or mental harassment
- We shall provide, and strive to maintain, a clean, healthy and safe working environment in line with our Health and Safety policy and safe systems of work
- We shall develop Environmental policies and objectives as part of the business planning cycle.

Dan McCaffrey **Divisional Director**

Reviewed January 2024













Cookies Policy

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to tog into secure areas of our website, use a shopping cart or make use of e-billing services.

- Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- Functionality cookies. These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- Targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have
 followed. We will use this information to make our website and the advertising displayed on it more relevant to your
 interests. We may also share this information with third parties for this purpose.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no contol. These cookies are Likely to be analytical/performance cookies or targeting cookies.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

Dan McCaffrey

Divisional Director

Reviewed January 2024











CCTV Policy

Introduction

This Policy is based on the Information Commissioners Office (ICO) CCTV Code of Practice and guidelines, in line with the GDPR. Balloo Hire Centre Ltd use.

For employees and for visitors to the company's business premises, such as clients, customers, contractors and suppliers, and to protect the company's property.

We also use mobile recording in company vehicles for security, safety and quality purposes. This policy sets out the use and management of the CCTV equipment and images in compliance with the GDPR and the ICO CCTV Code of Practice. The company's CCTV facility records images only.

There is no audio recording i.e. conversations are not recorded on CCTV (also please see the section on covert recording.

The Depot Manager at each site is responsible for the operation of the CCTV System and for ensuring compliance with this policy and any documented procedures.

Contact details:

Belfast Depot 02890 45 8080 Bangor Depot 02891 45 4457 Lisburn Depot 02892 66 8886 Ballyclare Depot 02893 34 0137 Glenavy Depot 02894 47 0362 Nutts Corner Depot 02894 47 0362 Omagh Depot 02880 75 8298 Dungannon Depot 02887 72 2429

All areas of Balloo Hire Centre Ltd operations covered by CCTV fall within this policy.

Signs are prominently placed at strategic locations including entrance and exit points to all sites, and on relevant vehicles to inform staff, visitors and members of the public that a CCTV installation is in use and who to contact about the system.

Purposes of CCTV

The purposes of the company installing and using CCTV systems include the following (this list is not exhaustive):

- To assist in the prevention or detection of crime or equivalent malpractice.
- To assist in the identification and prosecution of offenders.
- To monitor the security of the company's business premises.
- · To ensure that company health and safety rules and procedures are being complied with.
- To assist with the identification of unauthorised actions or unsafe working practices that might result in disciplinary proceedings and to assist in providing relevant evidence.
- To promote productivity and efficiency.
- To enable customer assurance and quality controls.

Location of cameras

Cameras are located at strategic points throughout the company's business premises, principally at the entrance and exit points. The company has positioned the cameras so that they only cover communal or public areas on the company's business premises, and they have been sited so that they provide clear images.

No camera focuses, or will focus, on toilets, shower facilities, changing rooms, staff kitchen areas, staff break rooms or private offices. All cameras (with the exception of any that may be temporarily set up for covert recording) are also clearly visible.

Appropriate signs are prominently displayed so that employees, customers and other visitors are aware that they are entering an area covered by CCTV.

Recording and retention of images

Images produced by the CCTV equipment are intended to be as clear as possible so that they are effective for the purposes set out above. Maintenance checks of the equipment are undertaken on a regular basis to ensure it is working properly and that the media is producing high quality images. Images may be recorded either in constant real-time (24 hours per day throughout the year) or only at certain times as the needs of the business dictate.

As the recording system records digital images, any CCTV images that are held on the hard drive of a PC or server are deleted and overwritten on a recycling basis and, in any event, are not held for more than 6 months. Once a hard drive has reached the end of its use, it will be erased prior to disposal. Images that are stored on, or transferred on to, removable media such as CDs are erased or destroyed once the purpose of the recording is no longer relevant.

However, where a law enforcement agency is investigating a crime or other internal investigation is in process, images may need to be retained for a longer period.

Access to and disclosure of images

Access to, and disclosure of, images recorded on CCTV is restricted.

This ensures that the rights of individuals are retained. Images can only be disclosed in accordance with the purposes for which they were originally collected.

Images that are filmed are recorded centrally and held in a secure location. Access to recorded images is restricted to the operators of the CCTV system and to those line managers who are authorised to view them in accordance with the purposes of the system. Viewing of recorded images will take place in a restricted area to which other employees will not have access when viewing is taking place. If media on which images are recorded are removed for viewing purposes, this will be documented. Disclosure of images to other third parties will only be made in accordance with the purposes for which the system is used and will be limited to:

- The police and other law enforcement agencies, where the images recorded could assist in the prevention or detection of a crime, the identification and prosecution of an offender or the identification of a victim or witness.
- · Prosecution agencies, such as the Crown Prosecution Service.
- · Relevant legal representatives.
- · Line managers involved with company disciplinary and performance management processes.
- Individuals whose images have been recorded and retained (unless disclosure would prejudice the prevention or detection of crime or the apprehension or prosecution of offenders).

The Data Controller and those of director level and above are the only people permitted to authorise disclosure of images to external third parties such as law enforcement agencies.

All requests for disclosure and access to images will be documented, including the date of the disclosure, to whom the images have been provided and the reasons why they are required. If disclosure is denied, the reason will be recorded.

These records will be kept on file at each division.

Individual access rights

In line with the GDPR, individuals have the right, on request, to receive a copy of the personal data that the company holds about them, including CCTV images if they are recognisable from the image. If you wish to access any CCTV images relating to you, you must make a written request to the company's Data Protection Officer and the company reserves the right to charge you a fee of £10.00 for the supply of the images requested.

Your request must include the date and approximate time when the images were recorded and the location of the particular CCTV camera, so that the images can be easily located and your identity can be established as the person in the images. The company will respond promptly and in any case within 40 calendar days of receiving the request.

The company will always check the identity of the employee making the request before processing it.

The Data Protection Officer will first determine whether disclosure of your images will reveal third party information as you have no right to access CCTV images relating to other people. In this case, the images of third parties may need to be obscured if it would otherwise involve an unfair intrusion into their privacy.

If the company is unable to comply with your request because access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders, you will be advised accordingly.

Third-party processors | accessors

Any third-party that has access to, or processes CCTV data on our behalf will also be subject to this policy and we will have recorded as such.

Covert recording

The company will only undertake covert recording with the written authorisation of the Managing Director (or another senior director acting in their absence) where there is good cause to suspect that criminal activity or equivalent malpractice is taking, or is about to take place and informing the individuals concerned that the recording is taking place would seriously prejudice its prevention or detection. Covert monitoring may include both video and audio recording.

Covert monitoring will only take place for a limited and reasonable amount of time, consistent with the objective of assisting in the prevention and detection of particular suspected criminal activity or equivalent malpractice.

Once the specific investigation has been completed, covert monitoring will cease. Information obtained through covert monitoring wilt only be used for the prevention or detection of criminal activity or equivalent malpractice. All other information collected in the course of covert monitoring will be deleted or destroyed unless it reveals information which the company cannot reasonably be expected to ignore.

Staff training

All relevant employees will be trained in general awareness of the CCTV system and on the impact of GDPR with regard to that system and how it operated.

In addition, those handling CCTV images or recordings will be trained in the operation and administration of the system to the required degree.

Implementation

The companies Data Protection Officer is responsible for the implementation of and compliance with this policy and the operation of the CCTV system and they will conduct regular review of the company's CCTV.

Any complaints or enquiries about the operation of the company's CCTV should be addressed to the relevant division in the first instance, using the details given above, using the system contact details given above.

Dan McCaffrey

Divisional Director

Reviewed January 2024











Anti Bribe Policy

1. Introduction and policy objective

1.1 Balloo Hire Centres Ltd (hereinafter known as "the company" is committed to the highest level of legal, ethical and moral standards. This Policy is intended to ensure compliance with all relevant laws regarding bribery and corruption, including specifically, the UK Bribery Act (2010 - hereinafter referred to as the "the Act') which affects business dealing anywhere in the world, The Policy should enable employees to recognise the potential areas of concern, avoid prohibited conduct and promptly seek guidance when necessary so that both Ballo° Hire and its employees are protected from the legal and reputational consequences of bribery and corruption violations.

2. Statement of Policy

- **2.1** Balloo Hire does not tolerate any form of bribery. All employees and all those acting on behalf of Balloo Hire are strictly prohibited from offering, paying, soliciting or accepting bribes. External and internal bribery risk will be regularly and systematically assessed and adequate risk based procedures, aimed at preventing bribery, implemented_
- 2.2 The highest possible standards of personal honesty and integrity are expected from the Company's senior managers, officers, directors, employees (whether permanent, fixed term or temporary) consultants, sub contractors, business partners, agents, suppliers, customers, distributors or any other related parties. Under the Act these parties are referred to as "associated partners".

3. Definition of Bribery

- **3.1** Bribery is defined in the Act as the offering, giving, soliciting and acceptance of an inducement or reward, which may influence a person to act unethically.
- **3.2** Bribes often involve monetary payments or the promise of such payments but can include other benefits or advantages, including but not limited to any of the following:
- gifts and hospitality, particularly where they are disproportionate, secret, frequent or made in context of business negotiations.
- · product discounts or credits that are disproportionate and not readily available to the general customer base.
- not paying for use of Company services or facilities.
- political or charitable donations made to a third party linked to or at the request of a customer.
- · employment, business or investment opportunities.
- · personal favours.
- · the writing off of a debt.
- **3.3.** The Act contains two general offences. One is promising or giving a bribe and the other is requesting. agreeing to receive or receiving a bribe. There is also a specific offence covering bribery of a foreign public official and a corporate offence for failure by a company to prevent a bribe being paid on its behalf by its employees, agents or other associated persons.

The only defence for companies charged under the latter offence is that they have "adequate procedures" in place to prevent bribery.

4. Consequences of bribery and disciplinary action

- **4.1.** Any breach of the Act by the Company, its employees or any other associated persons may result in:
 - significant fines.
 - negative publicity and related reputational damage which may lead to removal from government tender lists and other adverse commercial implications.
- **4.2.** Any employee who fails to comply with the Policy and/or the Act may also be subject to:
- · disciplinary action which may include dismissal; and
- · criminal penalties under the Act which may include a fine and/or imprisonment for up to 10 years.
- 4.3. Any other associated person who fails to comply with the Policy and/or the Act may be subject to:
 - criminal penalties under the Act which may include a fine and/or imprisonment for up to 10 years.
 - · immediate termination of any commercial relationship with the Company.

5. Responsibilities

- 5.1. it is the responsibility of all those listed in 2.2 above to read, understand and comply with the Policy which also includes the prevention, detection and reporting of bribery and other forms of corruption. This means avoiding any activity that might lead to, or suggest, a breach of the Policy.
- 5.2. it is the responsibility of all those listed in 2.2 above to notify a senior member of the Cornpanys management team as soon as possible if it is believed or suspected that a breach of the Policy has occurred or may occur in the future.
- 5.3. No employee will suffer demotion, penalty or other adverse consequences for refusing to pay bribes or refusing to participate in the corrupt practices even if it means the loss of business to the company.
- 5.4. The Company management, led by the Managing Director, has overall responsibility for ensuring the Company complies with its legal and ethical obligations, and that all those under their supervision are aware of the Policy and obligations.
- 5.5. The financial controller has the primary day to day responsibility for implementing the Policy and for monitoring its use and effectiveness and dealing with any queries in its interpretation
- 5.6. Management at all levels are responsible for ensuring those reporting to them are made aware and understand the Policy and that adequate and regular training is delivered to them as required.

6. What is not acceptable

- 6.1. in addition to the items listed in 3.2 above, it is not acceptable for any employee or any other associated person to:
- · give, promise to give or offer, a payment, gift or hospitality with the expectation or hope that
- a business advantage will be received, or to reward a business advantage already given;
- give, promise to give or offer, a payment, gift or hospitality to a public foreign official, agent or representative to "facilitate" or expedite a routine procedure (see 7.3 below)
- accept payment from a third party if it is know or suspected to have been offered with the expectation that it will obtain a
 business advantage for them;
- · accept a gift or hospitality from a third party if it is known that it is offered or provided with
- the expectation that a business advantage will be provided by the Company in return;
- threaten or retaliate against another employee or any other associated person who has refused to commit a bribery offence
 or who has raised concerns with management under the Policy;
- engage in any activity that might lead to a breach of this Policy or is in contravention of the law or acceptable ethical standards

7. Facilitation Payments

- 7.1. Facilitation payments, otherwise known as "grease payments" or "kickbacks" are typically small, unofficial payments made to secure or expedite a routine action by a government or public official. Examples include the issuing of a permit, licence, consent or immigration visa, scheduling an inspection associated with contract performance, providing services or releasing goods held in customs.
- 7.2. Typically the consequence of not paying can be out of all proportion to the sma payment demanded, Depending on the jurisdiction these payments may be more or less common.
- 7.3. Balloo Hire prohibit facilitation payments. The only exception to this rule is that a payment may be made where the life, safety or health of an individual is threatened. Full details of such payments must immediately be reported to management.
- 7.4. A payment of a fee for the use of a recognised legitimate, fast track procedure which is open to all is not considered to be a facilitation payment. A receipt for such payment should always be requested.

8. Gifts and Hospitality

- 8.1. Gifts and hospitality remain a legitimate part of conducting business and should be received or provided only in compliance with the Company's Gifts, Hospitality and Promotional Expenditure Policy.
- 8.2. It is prohibited to offer or receive gifts or hospitality that could influence or be perceived to be capable of influencing the outcome of transactions or decisions relating to the Company's business.
- 8.3. The following general principals apply to gifts and hospitality:
- the value of gifts and hospitality, whether given or received, should be proportionate to the matter to which they relate and should not be unusually generous.
- gifts and hospitality to or from relevant parties should be generally avoided at the time of tendering for the award of contracts
- cash must NEVER be given or received as a sift under any circumstances.
- gifts and hospitality must neither by given or received as rewards, inducements or encouragement for preferential treatment or inappropriate or dishonest conduct.
- gifts and hospitality must not be actively sought or encouraged from any party, nor should the impression be given that the
 award of any business, custom or conduct will be in any way conditional on gifts or hospitality.
- gifts and hospitality, whether given or received, should be recorded in accordance with the Company Gift, Hospitality and Promotional Expenditure Policy.

9. Political contributions, charitable and community donations.

9.1. Political Contributions

Political contributions include any contributions, made in cash or kind, to support a political cause. contributions in kind can include gifts of the use of company property or services, advertising or promotional activities endorsing a political party, the purchase of tickets to fundraising events or the use of employees' time to assist with political campaigning.

The laws governing political contributions vary in different parts of the world. In some jurisdictions corporations, government contractors and/or those who employ lobbyists are prohibited from making political contributions; in other such amounts must be disclosed publicly. Balloo Hire and its employees should not make political contributions to or through political parties, organisations or individuals engaged in politics, as a way of obtaining advantage in business transactions. Where political contributions is deemed to be appropriate, not given as a means of obtaining business advantage and supports the democratic process, the Managing Director may, subject to the relevant law, give written approval for such a contribution. All such relevant expenditure should be documented, receipted and recorded.

9.2. Charitable and Community Donations

Balloo Hire encourages active participation by its divisions and employees in charities and local community endeavours in the form of monetary and other assistance. It is recognised that practices vary across countries and regions. Any donation must comply with, as a minimum, the rule that it must only be made for bona fide charitable or public relations reasons and never when there is or may be a potential conflict of interest or possibility that the donation could be used a concealment for bribery.

10. Engaging the services of a business partner

10.1 It is normal business practice to engage the services of business partners such as sales agents, distributors, business consultants, sub contractors, lobbyists and other partners to act on behalf if companies to assist in securing, preparing or negotiating bids for new contracts or the extension of existing contacts when it is necessary and appropriate to supplement existing experience in given markets or subject areas.

10.2 In order to protect Balloo Hire from any association with illegal or corrupt payments or the risk of such payments being made on behalf of Ballot Hire, it is Company policy that:

- suitable and sufficient due diligence procedures must be undertaken to ensure such
- business partners share the Company commitment to ethical business standards.
- · written arrangements containing the Anti Bribery provisions are put in place (as set out in the Anti Bribery Policy).
- all payments made to business partners are in accordance with the contract agreed and signed by the Company

10.3. A business partner will only be engaged on completion of anti bribery due to diligence by the Company in accordance with the perceived level of risk associated with the business partner concerned and hislher location, reputation and be 10.4. The compliance of business partners with the Company Ant Bribery Policy must be kept under review after engagement_

11. Monitoring and Review

11.1. The Financial Controller, will regularly monitor the effective cress and review the implementation of the Policy In relation to its suitability, adequacy and effectiveness.

Dan McCaffrey **Divisional Director**

Reviewed January 2024













Sustainability Policy

Balloo Hire Centres is committed to the principles of sustainability. The Company aims to follow and promote good sustainability practice, to reduce the environmental impacts of all our activities and help our employees, suppliers, customers and wider stakeholders to do the same.

Therefore, it is the policy of Balloo Hire Centres to:

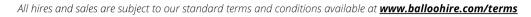
- · Comply with, and exceed where practicable, all applicable legislation, regulations and codes of practice.
- Set detailed and quantifiable objectives to implement the Sustainability Policy.
- · Commit adequate resources to ensure these objectives are met,
- Integrate sustainability considerations into all our business decisions.
- · Ensure that all staff are fully aware of our Sustainability Policy and are committed to implementing and improving it.
- · Make suppliers aware of our Sustainability Policy, and encourage them to adopt sustainable business practices.
- Regularly review the Sustainability Policy and any procedures produced under it to ensure their continuing relevance and
 effectiveness.

This policy will be available internally to all Balloo Hire Centres employees and also made available to our customers, suppliers and other interested parties on the company website.

Dan McCaffrey

Divisional Director

Reviewed January 2024













Quality Policy

Balloo Hire Centres is committed to providing the highest quality equipment hire and sales. The Company aims to be considered the best in the industry by providing products and services that satisfy a customer's requirements in every respect.

The Company will endeavour to realise this vision by implementing, maintaining and continually improving a Quality Management System which is aligned with the requirements of ISO 9001. Therefore, it is the policy of Balloo Hire Centres to:

- Set detailed and quantifiable objectives to implement the Quality Policy.
- Commit adequate resources to ensure these objectives are met.
- Ensure employees are aware of the policy, understand what is required of them and are committed to implementing and improving it.
- Provide employees with the necessary encouragement, guidance, information and trainin to play their part in implementing the policy.
- · Continually improve systems and work processes to meet or exceed customer's current and future expectations.
- · Work with others in the supply chain to raise awareness of quality performance and encourage best practice.
- Regularly review the policy and any procedures produced under it to ensure their continuing relevance and effectiveness_

This policy will be available internally to all Balloo Hire Centres employees and also made available to our customers, contractors, suppliers and other interested parties on the company website.

Dan McCaffrey

Divisional Director

Reviewed January 2024













Red Diesel Fuel Policy

From the 1st of April 2022 the Government will be removing the entitlement to use rebated fuels (Red Diesel / Red HVO) for most sectors. This is a change that will have an impact on us all.

Due to these new regulations, Balloo Hire will begin transition ing from rebated fuels to white diesel and white HVO in all our hire equipment.

By the 1st of April 2022, we will be operating our business using white diesel and white HVO only, any equipment supplied can only be refuelled using white diesel or white HVO.

Balloo Hire, will supply as standard, white diesel from the 28th March 2022 in order to ensure that our company and customers are ready and operating legally by the 1st of April 2022 regulation deadline.

If a machine is refuelled with rebated fuels after the 1st of April 2022, a fee will be charged to drain the fuel tank, dispose of the rebated fuel, and then refill it with white diesel.

To learn more about these changes, click here to visit a government website that explains the changes and how to prepare for them.

Balloo Hire can supply white HVO fuel to you. If you wish to use white HVO Fuel, please request this when ordering the machine/equipment.

Dan McCaffrey

Divisional Director

Reviewed January 2024











Integrated Policy Statement

Within the scope of our Integrated Management System; The hire, sale and repair of tools, plant, equipment, accommodation, welfare facilities and ancillary products servicing clients within Northern Ireland, we at Balloo Hire recognise that providing our customers with a quality service whilst ensuring the safety of our staff and stakeholders are critical to our business. We are committed to providing the necessary resources to ensure we continuously improve our business practices within these core areas.

To achieve this, we have developed and will maintain an Integrated Management System that will meet the requirements of the current versions of ISO9001, ISO45001 and ISO14001.

This Integrated Management System Policy Statement calls for continual improvement within our management activities and business will be conducted according to the following principles;

We will:

- Ensure Top Management are accountable for making best use of our management resources in all Quality and Health and Safety matters to continually improve our Integrated Management System and its effectiveness in delivering our overall strategic organisational objectives;
- · Comply with all applicable health and safety laws, statutory regulations and stakeholder requirements;
- Ensure the Integrated Management System is reviewed regularly by top management to ensure it is appropriate to the
 nature and scale of our service provision and foreseeable Hazards;
- Regularly set, review and communicate our Integrated Management System Objectives and performance against defined
 objectives throughout the organisation and to interested parties where appropriate;
- Work closely with our stakeholders, customers and suppliers to establish the highest quality standards;
- Adopt a forward-looking view on future business decisions which may have impacts on our ability to provide customers with a quality service;
- Train our staff in the requirements of the Integrated Management System and their responsibility in maintaining and improving it:
- Ensure this policy is available to the interested parties and where appropriate, actively communicate it to all direct
 employees, indirect employees and other interested parties, whilst regularly reviewing it to ensure it continues to meet our
 requirements;

Dan McCaffrey **Divisional Director**

Reviewed January 2024













Health, Safety & Welfare Policy

Balloo Hire Centres is committed to ensuring the health, safety and welfare of those who may be affected by its acts or omissions. The Company will endeavor to continually develop its policies and procedures to ensure, so far as is reasonably practical, the wellbeing of its employees, customers, visitors and the general public.

- Comply with current statutory requirements and offers to which we subscribe in this regard.
- Set detailed and quantifiable objectives to implement the Health, Safety & Welfare Policy and commit adequate resources
 to ensure these objectives are met.
- Provide a place of work that is safe and poses minimal risks to the health and welfare of employees, customers, visitors and the general public.
- Provide and maintain safe plant and equipment.
- Ensure the safe handling and use of substances.
- · Prevent accidents and cases of work-related ill health.
- Provide employees with the necessary information, instruction, training and supervision to do their job safely and competently.
- Consult with employees on matters affecting their health and safety.
- Assess risks arising from work activities and ensure that sufficient control measures are in place to protect those at risk.
- · Work with others in the supply chain to raise awareness of health and safety performance and encourage best practice.
- · Regularly review the policy and any procedures produced under it to ensure their continuing relevance and effectiveness.
- This policy will be available internally to all Balloo Hire Centres employees and also made available to our customers, suppliers, contractors and other interested parties on the company website.

Dan McCaffrey **Divisional Director**

Reviewed January 2024

All hires and sales are subject to our standard terms and conditions available at www.balloohire.com/terms













Privacy Policy

Balloo Hire Centre Ltd (We) are committed to protecting and respecting your privacy.

This policy (together with our Terms & Conditions) sets out the basis on which any personal data We collect from you, or that you provide us will be processed by us. Please read the following carefully to understand our views and practic- es regarding your personal data and how we will treat it.

Use of Information:

We will not collect any information about individuals, except where it is specifically and knowingly provided by them. Examples of such information are:

Your name

Your email address

Your occupation

We may share nor-personal aggregate statistics (group) data about our site visitors' traffic patterns with partners or other parties. However, we do not sell or share any information about individual users.

We use information held about you in the following ways:

To ensure that content from our site is presented in the most effective manner for you and for your computer.

To provide you with information, products or services that you request from us or which We feel may interest you, where you have consented to be contacted for such purposes.

To carry out our obligations arising from any contracts entered into between you and us.

To allow you to participate in interactive features of our service, when you choose to do so.

Security:

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

Links to other websites:

Our website may contain finks to enable you to visit other websites of interest easily. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and Look at the privacy statement applicable to the website in question.

IP addresses and user account tracking:

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

Where you register to use one of our sites by creating a user account, we may collect information which identifies your use of our site: for example, pages visited and files downloaded.

Cookies:

A cookie is a small file which asks permission to be placed or your computer's hard drive. Once agreed, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs likes' and dislikes by gathering and remembering information about your preferences.

We use traffic Log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept. Most web browsers automatically accept cookies, but you can modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Controlling your personal information:

You may choose to restrict the collection or use of your personal information in the following ways: Whenever you are asked to fill in a form on the website, type NO in the marketing box if you do not wish to be contacted by anybody for direct marketing purposes. If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time in writing or emailing us at marketing@balloohire.com.

We will not sell, distribute or lease your personal information to third parties unless We have your permission or are required by law. We may use your personal information to send you promotional information about third parties which We think you may find interesting if you tell us that you wish this to happen.

Your Rights:

In addition to these safeguards, your personal data is protected in the UK by the Data Protection Act 2018 (DPA 2018). This provides amongst other things that the data we hold about you should be processed lawfully, fairly and be transparent about what we do with your data. It should be accurate, relevant and not excessive. The information should be kept up to date, necessary, and not retained for Longer than is necessary. It should be kept securely to prevent unauthorised access by other people. Where information is transferred outside the LEA, and where this is to a stakeholder or vendor in a country that is not subject to an adequacy decision by the EU Commission, data is adequately protected by EU Commission approved standard contractual clauses, an appropriate Privacy Shield certification or a vendor's Processor Binding Corporate Rules.

The Act gives you the right to access information that we hold about you.

Changes to our privacy policy:

Any changes we may make to our privacy policy in the future will be posted on this page.

Dan McCaffrey **Divisional Director**

Reviewed January 2024

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System Use Policy

1. Introduction

Information and Communications Technology is an increasingly integral part of Balloo Hire Centre Ltd (Balloo) business operations, and it is standard tor employees to use multiple technology devices (PCs, Laptops, tablets, Mobile phones and others) as part of completing day to day activities.

It is important that Balloo, as a business, uses technology in a manner that portrays the professionalism of the company. This policy has been drafted to guide all employees on acceptable use when using Balloo's systems (hardware and software) and the responsibilities and expected behaviours when interacting on any non-Balloo systems, e.g.: Social Media sites.

The objective of the policy is to ensure that Balloo IT hardware, software, mobile phones, data and information are protected from all threats, whether internal or external, deliberate or accidental. It is important to ensure Balloo employees, suppliers and customers are also protected from such threats. Balloo does not operate a BYOD policy (Bring your own device) Use of personal devices is not permitted.

It is the Policy of Balloo to ensure:

- Information is protected from unauthorised access.
- · Valuable or sensitive information is protected from unauthorised disclosure.
- · All software copyrights are respected and all terms & conditions of any license to which Balloo are a party are adhered to.
- The accuracy and completeness of information by preventing unauthorised modification. Individual accountability is established tor appropriate system usage.

Individual accountability is established tor the security and maintenance of all IT hardware.

- · Regulatory and legislate requirements are met.
- Balloo facilities and assets are only used tor authorised activities.
- Balloo assets remain the property of the company.

At the core of the policy is the principle of individual responsibility tor technology which Balloo provides to an employee. It is the employee's responsibility to ensure that this policy is adopted and followed.

Any updates on the guidelines to systems usage will be updated and new guidance issued.

2. Internet Use

If you have access to the Internet this is to be used in a manner which is consistent with and appropriate to professional business conduct. The Internet must only be used tor authorised actives. When on the Internet, employees must regard themselves as representing Balloo and must conduct themselves to avoid bringing the Company into disrepute. Whilst primarily tor business use, limited personal use is permitted before or after work hours and during lunch time; personal use should be reasonable and must not expose the Company to risk or adverse publicity as a result of misuse.

Any personal use of the Internet must not affect your ability to carry out your work. Please see below further guidelines regarding internet usage in the workplace:

- · Maintain the security of your log-on ID and passwords at all times
- Do not change the Internet software configuration onyour workstation.
- Do not download or install unauthorised software. If you require added functionality tor your business, you should contact and request it from your depot manager. This is valid tor all types of software, updates, patches, drivers etc.
- Refrain from sending confidential or private information via Internet mail (e.g.: Gmail or Hotmail accounts) unless authorised to do so.
 - Downloading files must only be done from secure sites and only for Balloo purposes. Employees are not authorised to download games, music (incl. MP3), video sequences, screen savers; the download of files making Balloo liable for costs and licensing is not permitted.
 - Do not transmit copyright protected material as this may contravene relevant and applicable laws. Employees are not permitted to store copyrighted material on company systems, including but not restricted to, MP3s and videos.
 - Do not access, publish or transmit material of a potentially offensive or illegal nature. Use of internet services via the IT Infrastructure for illegal or unlawful purposes, including copyright, infringement, obscenity, libel,slander, fraud, defamation,plagiarism, harassment, intimidation, forgery, impersonation, soliciting for illegal pyramid schemes and computer tampering is prohibited. Especially all kinds of pornography
 - Report any incorrect, inflammatory or misleading portrayal of Balloo on the internet to your manager.
 - Employees are not permitted to use unauthorised internet-telephony services (e.g.: personal Skype calls).

3. Email Use

Balloo seeks to promote and make proper use of technology in the interest of its business and its employees. Email is a key business tool and is provided primarily for business use.

- Balloo recognises that employees may need to use email occasionally for personal purposes, which should not interfere
 with you work.
- · Please note email phishing scams are on the rise if you believe you have received a phishing email DO NOT click on
- any attachments or links. Delete the email and inform your line manager.

We use Microsoft Outlook as our email platform, and you will be required to enter a complex password containing letters, numbers and symbols. This password will change monthly.

Please ensure this password is not written or shared with anyone internal or external to the organisation. If you believe your password may have been compromised, please contact your line manager immediately.

This section outlines the responsibilities of employees using Balloo email.

Emails should be drafted with care. Due to the informal nature of email, it is easy to forget that it is a permanent form of written communication and that material can be recovered even when it is deleted from your computer

You should not send unnecessary emails or copy others into the message without good reason. Unnecessary emails wastes company memory and congests the email system.

Emails of a personal nature both sent and received are to be kept to a minimum during working hours.

You must not use emails to send or forward any materials that might cause offence to any person communicating with anyone via email you should not make or forward any statement which could be construed as;

4. Defamatory;

Sexist or racist in nature;

A derogatory remark relating to a persons sex, race, disability, sexual orientation, gender reassignment, religion, belief, policitcal beliefs, age, ethnic origin, colour or nationality (this is not exhasustive); For criminal purposes; or

Being of an offensive r obscene nature.

Reviewed January 2024

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