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Registered No. 3109202
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E&EO.

Principles and Policies for the Conduct of Our Business

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Background

The company was founded to manufacture a safer traffic signal, than the GLS lamps that were then in widespread use on loading bays. The aims of our first product were for a safer, energy efficient and more reliable product. These aims were met with our RG100 receiving the Millennium product award, and remain at the core of our business values and our guiding principles.

The directors of Dok-Tek have set out these “Principles and Policies for the Conduct of Our Business”, to enable Employees, Clients, & Others, that may be involved with, or are affected by, our activities, to understand the companies requirements.



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Key Principles

Dok-Tek Systems Ltd. wish to achieve commercial success, in the LED signal light market by the application of the policies of Honesty, Integrity and Fairness in all aspects of our business.

We accept our responsibilities to find solutions that are good for Business, the Environment, Employees, Clients, the Community and the Quality of Life, even beyond the jobs, products and services offered.

Our goal is zero for injuries, illnesses, waste, emissions and incidents, and we accept the need for our continuous improvement across the whole range of our activities. These are fundamental core values that we believe make good business sense.

Our aim is for sustainable growth, on solid foundations, in partnership with our clients, employees and suppliers.

We welcome diversity and will follow a policy and practice of equality of opportunity in employment for all employees and potential employees.

We will endeavour to meet Client's expectations with products and services offered.
The directors accept both their individual & corporate responsibilities to ensure proper application of these policies.

These policies will be monitored & reviewed periodically to ensure that they remain effective, and meet the changing requirements of statutory bodies, clients, employees and the community.

The particular policies by which these objectives will be achieved are further detailed below.
Elements are repeated under relevant headings.



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Safety Policy

Our principle of safety management is firmly rooted in the belief that all injuries and incidents, within Dok-Tek Systems control, are preventable.

We will endeavour to meet our goal of zero accidents by excellence in safety management. We aim to set a safety culture, with an interdependent mind-set, with directors, supervisors & employees working as a team to achieve our safety goal.

Our policy is to provide and maintain safe places and systems of work for all our employees by the provision of information, assessments, controls, rules, equipment, training and other provisions.

We will use hierarchical principles to control hazards, with elimination or avoidance being the first choice.

Dok-Tek Systems accept that we have a responsibility to manage, the risk encountered by employees, when they use the road as part of their duties, on behalf of Dok-Tek Systems Ltd.

All accidents, incidents and near misses shall be investigated and reported. A detailed procedure will be used to identify root causes, with the aim of elimination of causes.

Our commitment to safety doesn't stop with our own employees; we also accept our responsibility for the health and safety of other people who may be affected by our activities and we will encourage others to adopt best safety practice.

Bribery, Corruption, Fraud & Dishonesty

Dok-Tek Systems accept our responsibility to take all necessary measures to ensure Honesty in all our business dealings. We will withdraw from any company or individual who attempts Bribery, Corruption, Fraud & Dishonesty in dealing with our company. We will cease purchasing or supply with any company or individual who attempts Bribery, Corruption, Fraud & Dishonesty.

We treat Bribery, Corruption, Fraud & Dishonesty by any employee as gross misconduct.

We will gather any evidence of Bribery, Corruption, Fraud & Dishonesty and fully co-operate with any relevant authority.

Modern Slavery & Human Trafficking

Dok-Tek Systems accept our responsibility to take all reasonable measures to ensure that Modern Slavery & Human Trafficking have not been involved the goods and services we procure.

We will cease purchasing or supply from any company or individual where there is any evidence or suspicion of Modern Slavery or Human Trafficking.

We will gather any evidence of Modern Slavery & Human Trafficking and fully co-operate with any relevant authority.



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Environment

We recognize that the Earth's resources are limited and that conservation is necessary for human survival.

Dok-Tek Systems accept our responsibility to take reasonable measures to meet our goal of zero waste & emissions, by reduction of our environmental impact.

Quality

Dok-Tek Systems will endeavour to meet our client's expectations in the provisions of goods & services.

Quality deficiencies will be investigated to identify & eliminate root causes, with a focus on eliminating Quality deficiencies "at the source", to achieve our goal of enduring improvement.

Training

Dok-Tek Systems encourages its employees in the development of their careers to enable them to meet Dok-Tek Systems organisational goals. Our aim is to help all employees to develop to their full potential, and talents. This will enable the resources of the workforce to be fully utilised.

Employment

This section details sets out the principles and policies to be used by Dok-Tek Systems in employment relations, with particular reference to selection, and employment rights.

Remuneration

Remuneration will take account of the Living Wage Foundation recommendations. Earnings with production bonuses will meet their recommendations for all employees except those on a starting trial period of up to 12 weeks.

Equal Opportunities & Discrimination.

The effectiveness of this policy depends upon all members of staff accepting personal responsibility for the application of its principles and creating an environment free from discrimination where all staff members are treated with respect and dignity.

Dok-Tek Systems endeavour to avoid discrimination in all forms, be it direct or indirect, and welcome diversity and promotion of a policy and practice of equality of opportunity in employment for all employees and employment applicants.

No employee will receive less favourable treatment on the grounds of gender (or gender reassignment), race, colour, nationality, creed, marital status, ethnic origin, disability, sexual orientation, political belief, religious belief, spent convictions, part / full time working, or membership / non-membership of a trade union.



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Discrimination by any employee against another, including intentional harassment, alarm or distress through the use of threatening, abusive or insulting behaviour, words or displays, will be treated as serious or gross misconduct.

Recruitment, employment and access to opportunities will be made on the basis of ability, willingness and aptitude, to perform the work. Access to opportunities includes: promotion, transfer, training or any other benefits, schemes, facilities or services.

Any employee, who feels that they have been unfairly discriminated against, should use the Grievance Procedure detailed below.

Sexual discrimination

No employee or applicant for employment will be treated less favourably than the treatment, which was (or would be) accorded to a person of the opposite sex.

Conditions or requirements, which seem to affect men and women equally, will not be applied if in practice they disadvantage a far greater proportion of one sex than the other.

Racial Discrimination

No employee or applicant for employment will be treated less favourably than the treatment, which was (or would be) accorded to another person, on the grounds of colour, race, nationality, or ethnic or national origins.

Any recruitment or employment condition or requirement will only be applied if it is a justifiable condition or requirement irrespective of the colour, race, nationality or ethnic or national origins of the person to whom it is applied.

Work placements, which occur on the grounds of colour, race, nationality, ethnic or national origins, will be treated as a further form of discrimination.

Disability Discrimination

Dok-Tek Systems If an employee develops a disability; the Company will endeavour to keep him/her in employment if this is practicable.

Dok-Tek Systems will endeavour to provide employment to persons with disabilities and will make willingly make any adjustments to enable employment.

Recruitment & Promotion

Dok-Tek Systems will apply a selection process for both internal and external applicants that have the objective of the appointment of the highest quality staff available. Our selection procedures give applicants every opportunity to demonstrate their skills and abilities in a variety of relevant activities.

Dok-Tek Systems are committed to providing equality of opportunity for all, and welcomes applications from all individuals for advertised jobs that match their skills and interests.

Employees will be considered for jobs and promotion solely on the basis of their suitability, ability, skills, experience, knowledge, etc. Formal qualifications will be helpful to the successful applicant, but equally important is a demonstrable track record, experience and the right attitude. Generally preference will be given to those who use their own initiative.



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Age Discrimination & Retirement

Dok-Tek Systems normal retirement age will be 65 for all employees. Employees aged 60 years or more, at their entire discretion, will have the option to retire.

Where work projects may run beyond an individuals' normal retirement age, the needs of the project may affect selection. Otherwise no employee or applicant for employment, for a reason related to his or her age, will be treated less favourably than other people (broadly speaking), except where this treatment can be justified.

Dok-Tek Systems will make reasonable adjustments, considering all the circumstances, so that they do not put any person at a disadvantage in comparison to another younger or older person.

Working beyond normal retirement age will be entirely at the company's discretion. The impact on the job, the impact on other workers, and age related health matters will influence any decision.

Families & Relationships.

Dok-Tek Systems understand that our employees need to balance the demands of their jobs with their domestic responsibilities. Our policy is to adopt a flexible approach in these circumstances however the impact on the job or other workers will be taken into account. Dok-Tek Systems recognise that this will benefit both individuals and the business by encouraging openness and loyalty from staff.

Industrial Relations

Dok-Tek Systems recognise that it is in the interests of Employer & Employees to encourage a climate of good industrial relations through procedures for the communication and resolution of individual and collective grievances.

The first step will be an attempt to resolve matters by informal discussion, and it is anticipated that the majority of problems can be finalised by such means.

Dok-Tek Systems may have an employment adviser who may be involved in the proceedings set out below.

Dignity at Work

Whatever the form of harassment, it is likely to be unwanted, unreasonable behaviour, which is unwelcome and unpleasant to the recipient and is not acceptable to Dok-Tek Systems.

Dok-Tek Systems endeavour to ensure that both moral and legal responsibilities are met, by providing a suitable working environment for all members of staff, or potential members of staff, free of harassment, intimidation, bullying, or any behaviour that may be unacceptable behaviour on a personal level.

Dok-Tek Systems are committed to protecting our employees against harassment and bullying at work and supports the rights and opportunities of all people to obtain and hold employment without discrimination, or abuse.

Ensuring that harassment and bullying does not occur, requires all employees to be sensitive to the feelings of others and treat them with respect at all times. It is the duty of each Employee to ensure that by their individual attitude and behaviour to their colleagues and to everyone with whom the Company works, they are without prejudice of any kind and promote fair treatment and



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acceptable behaviour amongst those with whom they work.

Offensive, abusive, intimidating, malicious, humiliating, or insulting behaviour by any employee, or group of employees, against another, through the use of physical actions, or behaviour that is threatening, abusive or insulting, or words or displays, and which the perpetrator/s know or should know is offensive and unwarranted, will be treated as serious misconduct, and render those involved liable to be subjected to the disciplinary procedure, which may lead to dismissal.

Any employee, who feels that they have been attacked, bullied or harassed unfairly, should use the Grievance Procedure detailed below.

Individual Dispute or Grievance

Employees who feel that they have been unfairly discriminated against through direct or indirect discrimination, victimisation or harassment should make a complaint to their appropriate Director or Supervisor through the Company's Grievance Procedure.

If you have a grievance, within 7 days of the grievance being raised, the individual must always bring it to the attention of their supervisor. If the grievance is with your supervisor, you may then approach a director. If your grievance is with a director, when reasonably practicable another director of the company will review your complaint. The supervisor or director shall reply, either verbally or in writing, within 7 working days of the grievance being raised.

Failing satisfaction, details of the grievance shall be submitted in writing within a further 7 working days. A Director will then arrange an interview, within a further 7 working days.

The Director will then consider the matter and will make a final written reply within a further 7 working days. This decision will be the final stage of the procedure, and will not be considered again if raised at a later date.

A fellow worker or trade union representative, at any interview or hearing, may accompany employees.

Dispute or Grievance Affecting All or Groups of Employees.

In the event that a dispute arises on health & safety, wages, salaries, conditions of service, working arrangements, possible redundancies etc. Dok-Tek Systems will try and resolve these matters as soon as possible, by discussion with all concerned.

If this is not possible, then the following procedure will be applied:

- a) Consultation - Dok-Tek Systems will set up an arrangement whereby representatives of all or groups of employees are elected. Consultation with these elected representatives will then take place, at which the views of Employer and Employees will be put forward, and how the Employer proposes to take action.
- b) Dok-Tek Systems will listen to any counter proposal made by the elected representatives, and will give this conscientious consideration before a final decision is made.

Discipline

In the case of gross misconduct or persistent misconduct, the company may take sanctions against employees, including instant dismissal and refusal of references.



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Duties & Responsibilities

The effectiveness of these Policies and Principles depends upon the requirement of all members of staff to accept the duties and personal responsibility required to uphold and promote the application of its principles.

The directors will endeavour to ensure that all employees are aware of these Policies and Principles, and the duties placed upon them.

The responsibilities and duties of all key personnel will be defined, and their individual acceptance obtained.

Working Well Together

Dok-Tek Systems will endeavour to promote best practice amongst all clients and suppliers and those they work with.

Confidentiality

Dok-Tek Systems directors and employees, except in the proper course of employment, shall not disclose or allow the disclosure of any confidential information, trade secrets or any other information that is of sufficiently high degree of confidentiality to amount to a trade secret.

Acting as director, trustee, officer, partner, sole proprietor, employee, or consultant to any company doing business with, seeking to do business with, or in competition with the company, will be treated as serious misconduct.

Personal Information Policy

Dok-Tek Systems recognise that data is a valuable commodity and requires all employees to treat it as such.

Both physical security and electronic security measures will be taken by Dok-Tek Systems to protect Personal Information against unauthorised access, misuse, alteration, destruction or disclosure.

Dok-Tek Systems directors and employees shall ensure that personal data is not lost or accidentally disclosed to people who are not entitled to receive it. Personal Information should be withheld unless the identity of any recipient is known and it is clear that they are entitled to receive the information.

Dok-Tek Systems regard any actual or potential breach of security as a serious matter, whether due to deliberate acts or as a consequence of negligence, and will be treated as serious or gross misconduct. Any breach found should be reported to a director as soon as reasonably practicable.

Personal Information held by Dok-Tek Systems shall be adequate and relevant, and only be obtained and processed fairly and lawfully. This Personal Information shall be held for specified and lawful purposes and shall not be further processed in any manner incompatible with those



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purposes. Personal Information shall be kept up-to-date, reviewed periodically to ensure its accuracy, and not be retained unduly longer than is necessary. Old or outdated files will be physically destroyed, including old computer hard drives, CD's or floppy discs.

Dok-Tek Systems will not transfer Personal Information outside of the European Union unless that country ensures an adequate level of data protection.

Dok-Tek Systems retain Personal Information, which contain details of an individual employee's name and address, contact information, conditions of appointment, general conditions of service, emergency information, accident records & banking details. Sensitive Personal Information relating to racial or ethnic origin will be held for equal opportunity monitoring purposes only. Personal Information relating to membership of a trade union, criminal convictions, or physical health or mental health or conditions, will be held for employment law purposes only. Personal Information that puts forward suspicions about an employee's honesty, integrity, competence or reputation, will not be processed if it could be construed as a false statement, which discredits the employee concerned.

The Directors of Dok-Tek Systems accept that Employees have the right to see what data is held about them, including expressions of opinion about that individual, on computer and paper records, and where appropriate to have the data corrected or erased. Individuals have the right to be informed that data is held about them and be given a description of the data and the purposes for which they are being processed and the recipients to whom they are disclosed.

Dok-Tek Systems employees have the right to access their own individual personal file by making a written request to a Director. Files are available for inspection, but cannot be taken away, by not more than one working days notice.

Modern Slavery & Human Trafficking

Dok-Tek Systems recognise that we have a duty to avoid products and services that involve Modern Slavery & Human Trafficking. Dok-Tek Systems Ltd will use due diligence to avoid the use of products and services that involve slavery and human trafficking.

Entire Policy

This policy supersedes all prior arrangements and understandings whether written or oral with respect to the subject matter hereof and may not be varied except in writing.

Dok-Tek Systems may from time to time modify this policy, as necessary to meet the needs of the Employers business, and changes to the legal framework.

If any provision of this policy should be held to be invalid, it shall to that extent be severed and the remaining provisions shall continue to have full force and effect.

This Agreement shall be construed in accordance with the laws of England and Wales and shall be subject to the exclusive jurisdiction of the English courts.



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Approved by Directors:

		Signature	Date
Mr. M D Lake	Director		
Mr. N A Beary	Director		
