

## Sexual Harassment Policy

**1. Purpose:** The purpose of this policy is to ensure that all construction products manufactured, supplied, or distributed by CAPITAL SHIELD SECURITY LTD comply with the UK Construction Products Regulations, including the necessary UK Conformity Assessed (UKCA) marking and UK(NI) marking, where applicable. This policy outlines the procedures for demonstrating compliance with the UKCA and UK(NI) requirements to ensure that products meet the regulatory standards for safety, performance, and quality in the UK and Northern Ireland.

**2. Scope:** This policy applies to all construction products produced or marketed by CAPITAL SHIELD SECURITY LTD, whether manufactured in the UK, the EU, or internationally. It includes the requirements for ensuring that the correct marking and documentation are in place for products placed on the market in Great Britain (GB) and Northern Ireland (NI).

**3. Compliance Requirements:** CAPITAL SHIELD SECURITY LTD will ensure compliance with the following regulatory requirements:

- **UKCA Marking (Great Britain):** Products that fall within the scope of the Construction Products Regulations (CPR) must bear the UKCA mark before being placed on the market in GB.
- **UK(NI) Marking (Northern Ireland):** Products being placed on the market in Northern Ireland must either have the CE mark or UK(NI) mark, depending on whether the manufacturer is based in the UK or the EU.
- **Conformity Assessment Procedures:** The appropriate assessment procedures outlined in the CPR will be followed based on the product type and category. These procedures may involve third-party certification or self-declaration of performance.

#### 4. Roles and Responsibilities:

- **Compliance Officer/Team:** The Compliance Officer or appointed compliance team is responsible for overseeing the implementation and maintenance of this policy, ensuring that all products are assessed, tested, and documented according to UKCA and UK(NI) requirements.
- **Product Development & Quality Assurance Teams:** Responsible for ensuring that all products are designed, tested, and meet the performance requirements as specified in the relevant British Standards and harmonised standards.
- **Procurement & Supply Chain Teams:** Ensure that all suppliers and manufacturers comply with UKCA and UK(NI) marking requirements before purchasing or distributing products.

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- **Training and Awareness:** Ensure all relevant employees are trained in the Construction Products Regulations and the associated compliance requirements.

### 5. Procedures for Compliance Demonstration:

- **Step 1: Product Assessment**

Each construction product will be assessed against the relevant regulatory standards and classification systems, ensuring that the product's performance and safety characteristics are in line with UKCA and UK(NI) regulations.

- **Step 2: Conformity Assessment**

The product will undergo the appropriate conformity assessment procedure, which may involve:

- Self-certification for some low-risk products
- Third-party assessment by a notified body for higher-risk products

A Declaration of Performance (DoP) must be created for each product, specifying the key characteristics, compliance with relevant standards, and the methods used for testing or assessment.

- **Step 3: Marking**

After successful assessment, the appropriate marking (UKCA or UK(NI)) will be applied to each product, in accordance with the regulations. The marking will be visible, legible, and durable.

- **Step 4: Documentation and Record Keeping**

The company will maintain comprehensive records for each product, including:

- Declaration of Performance (DoP)
- Conformity assessment reports and certificates
- Product test reports and evidence of compliance
- Any certificates or documentation from notified bodies (if applicable)

These documents must be available for inspection by regulatory authorities upon request.

- **Step 5: Ongoing Monitoring and Auditing**

Periodic reviews of product compliance will be conducted to ensure continued adherence to UKCA and UK(NI) requirements. Regular internal audits will verify that procedures for testing, marking, and documentation are being followed.

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**6. Non-Compliance and Corrective Actions:** In the event of non-compliance or any issue with the conformity of a product, CAPITAL SHIELD SECURITY LTD will take immediate corrective actions, including:

- Removing non-compliant products from the market
- Updating product documentation or testing where necessary
- Engaging with relevant regulatory bodies to resolve issues
- Reassessing internal procedures to prevent future non-compliance

**7. Communication and Training:**

- Ensure all relevant employees are trained on the latest UKCA and UK(NI) requirements.
- Keep employees, suppliers, and other stakeholders informed of any changes in the regulations.

**Approved**

Managing Director



CAPITAL SHIELD SECURITY LTD

This policy is reviewed on 01 01 2026