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MG-1-028-02	People Policies – Code of Conduct Policy	
Effective Date	Reviewed by	Date Reviewed
04/09/2023	Alima Aminu	12/11/2024
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# **People Policies – Code of Conduct Policy**

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# 1. Induction

The Company Code of Conduct sets out the standards of behaviour the Company expects from all its people. Rules in relation to the conduct of all individuals are set out in this Code of Conduct and there are examples of what the Company considers to be gross misconduct which may lead to disciplinary action in accordance with the Disciplinary Procedure and could result in termination of employment.

This is a non-contractual policy, and the Company reserve the right to vary it at any time.

## 2. Behavioural Expectations

The following general standards are required by every individual within the Company:

- People should behave in a respectful, professional, and polite manner and ensure their behaviour does not breach the Equality Act 2010
- People should comply with all reasonable instruction from the management team
- People should cooperate fully with colleagues and management representatives
- People should always uphold and further the Company's positive public image
- Satisfactory standards of performance should be maintained at all times
- The Company's policies and procedures should be adhered to at all
- You are solely responsible for the safety of your personal possessions while in the Company's premises. You must ensure that your possessions are at all times kept in a safe place

# 3. Equality, Diversity, and Inclusion

An important core value of the Company is the promotion of inclusivity and diversity. It seeks to ensure that the workplace is supportive of its people and one where individual respect is shown to all individuals, regardless of age, (dis)ability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, ethnic background, culture, sexual orientation, religion or belief, sex, or any other factor. All our people will be supported and encouraged to perform to their potential.

For further information, please refer to the Equality and Diversity Policy.

## 4. Bullying and Harassment

The Company has a zero-tolerance approach to bullying and harassment.

Disciplinary action will be taken again inappropriate behaviour that shows a lack of respect for others or causes people to feel threatened.

For further information, please refer to the Bulling and Harassment policy.

#### 5. Gross Misconduct

Gross misconduct is any unethical and unprofessional behaviour an individual engages in, and it will be

The following offences are examples of gross misconduct:

Unauthorised use of the Company assets and equipment

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- Refusal to carry out role-based duties or obey reasonable instructions except where an individual's safety may reasonably be in jeopardy
- Intentional sexual harassment, harassment, bullying
- Serious breach of rules, policies, or procedures, especially those designed to ensure safe operation
- Divulging or misusing confidential information
- Theft or unauthorised possession of any property or facilities of the company, individuals, and clients
- Consumption of alcohol or drugs, or intoxication by reason of alcohol or drugs, which could affect work performance in any way or have an impact on other colleagues
- Having illegal drugs in the possession, custody, or control of the individual while at work or on the Company's premises
- Defrauding or attempting to defraud the Company, its customers, suppliers, or fellow colleagues
- Unauthorised or inappropriate use of email, internet and/or computer systems
- Falsification of any Company records including reports, accounts, expenses claims or self-certification forms
- Serious damage to Company property
- Violent, dangerous or intimidatory conduct
- Bringing unauthorised person(s) onto Company premises
- Conviction of any criminal offence which may render the individual unsuitable for the role
- Serious and/or repeated abuse of timekeeping and attendance procedures
- Failure to follow the Company's standard operating

#### 6. Conduct Outside Work

As a general rule, what people do after working hours and away from the premises is a personal matter. However, the Company will become involved in the following circumstances:

- At office parties, drinks events and other work-related social occasions
- At third-party (that is, clients and customers) occasions where the individual has been invited in their capacity as a representative of the Company
- At work-related conferences and training courses

Where the individual is away on business on behalf of the Company. The Company's policies will continue to apply at all these events. An individual should not bring the Company name into disrepute. Improper behaviour will lead to investigation and possible disciplinary action, including dismissal and in cases of gross misconduct, a summary dismissal.

For Further information, please refer to the company's Grievance and Disciplinary procedures.

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## 7. Relationships with other member of staff and clients and customers

The company does not concern itself with the private lives of its people unless they affect its effective operation or its reputation. Individuals who are relatives or who have a close personal relationship should not normally have a supervisory, assessing, or authorising relationship with each other.

Individuals must inform their line manager if they have a close personal relationship with another colleague or a client or customer which could be considered by colleagues or others, as impacting on the way they conduct themselves at work.

#### 8. Criminal Offences

For the avoidance of doubt, an individual must inform their manager in writing if they are under investigation for a criminal act (including road traffic offences) or have been arrested in connection with a criminal action. They must also inform their manager in writing if they have been found guilty and convicted of any offence or received a police caution. Failure to disclose this information may be treated as a disciplinary offence.

Furthermore, if an individual commits a criminal offence outside employment, the Company will investigate the matter to ascertain whether there is any connection between the offence and the individual's employment. If there is an adverse finding in this respect, this could result in the individual's dismissal under the disciplinary procedure.

## 9. Attendance and Timekeeping

Individuals will not be paid if any working time is lost due to lateness or unauthorised absence. Persistent lateness will be dealt with under the Company's disciplinary policy.

The following rules are required of all our people:

- People should be present and ready to start work in line with their contractual working hours. They must also remain in the workplace and continue to work until they have completed their contractual working hours
- People should ensure they notify their line manager in accordance with the Sickness and Absence Policy if they
  are going to be absent from work
- People should liaise with their line manager if they wish to leave early or arrive late

## 10. Signing in and out

This Guidance applies to our people who work on the various sites.

- Individuals must ensure that they adhere to the signing in and out procedures of the specific site they are working on
- It is not permissible under any circumstances for any person to sign in or out on behalf of another
- Failure to adhere to this procedure may result in disciplinary action taking place

#### 11. Communications

Individuals should have their personal mobile device either switched off, or on silent mode, during working hours. Discretion should be exercised when using a personal mobile device and any use must not cause a distraction from work for the person themselves or their colleagues. Personal calls and text messages should not be made during working hours; they should only be made during your lunch or other breaks. Authorisation should be

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obtained from their line manager if they need to make or receive an urgent personal phone call. In addition, it is forbidden to:

- Give personal phone numbers or home phone numbers to customers or clients
- Take pictures of colleagues, Company premises, customers or clients using personal mobile devices
- Transfer files via Bluetooth or other insecure mobile networks

Only certain job roles require the provision of a Company mobile phone. Where provided, they are for business use only.

Individuals should ensure they keep the Company mobile phone in good working order. The mobile phone should remain charged and connected to the network (as far as coverage permits) during working hours so business calls can be received as necessary.

When visiting clients and customers, or on other sites, you may be required to turn off your Company mobile phone. Individuals must observe any such requirements and ensure they comply with them.

The cost of line rental and normal business call usage will be covered by the Company. However, if the phone is used for personal use without authorisation, any monetary usage will be deducted from the person's pay.

#### 12. Email and Internet Use

The Company will not tolerate the use of email and internet for unofficial or inappropriate purposes, including:

- Any messages that could constitute bullying, harassment, or other detriment
- Accessing social networking sites such as Facebook using Company equipment or during work time
- On-line gambling
- Accessing or transmitting pornography
- Accessing other offensive, obscene, or otherwise unacceptable material
- Transmitting copyright information and/or any software available to the user
- Posting confidential information about people within the Company, the Company, its customers, or suppliers

Although our email facilities are provided for the purposes of our business, we accept that you may occasionally want to use them for your own personal purposes.

Individuals are not permitted to send personal emails during work time unless in the case of an urgent matter when you should seek the approval of your line manager before sending the email. Work email addresses should not be used to send personal emails.

Individuals may access their personal email accounts during break times. This is permitted on condition that all the procedures and rules set out in this policy, and the Company's code of conduct, are complied with.

People are not permitted to use the internet during work time unless in the case of an urgent matter when you should seek the approval of your line manager before use.

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People may use the internet during break times. This is permitted on condition that all the procedures and rules set out in the Company's Code of Conduct are complied with.

#### 13. Social media

Social media usage for work purposes is controlled by the Marketing Department. Approval will be granted by the Director of Marketing where this is required for an individual's job role.

Social media usage for personal reasons does not need approval by the Company.

When using social media, either in a personal or work capacity, during or outside working hours, individuals must adhere to the following guidelines.

Posts on social media must not:

- Compromise the Company, disclose confidential data or disclose sensitive data
- Damage the Company's reputation or brand
- Breach laws on copyright or data protection
- Contain content that is of defamatory nature
- Engage in bullying or harassment
- Be of illegal, inappropriate, or offensive content
- Interfere with your work commitments
- Use the company's name or reputation to promote any other product or any political options

## 14. Representing the Company

The Company recognises the importance of a work-life balance. Whilst we do not intend to restrict outside activities, it is important to remember that activities whether during or outside of working hours which result in adverse publicity to the Company, or which cause us to lose faith in your integrity, may give us grounds to proceed with disciplinary action.

When attending any work-related social function an appropriate standard of conduct is expected from all individuals. This includes but is not limited to nights out, dinners or other social events with suppliers, customers, etc.

Work-related social functions can be a great opportunity to celebrate and get to know your colleagues better. However, it is important to remember that our policies on anti-harassment and bullying, personal harassment, disciplinary and equal opportunities still apply fully at these events.

# 15. Fraternisation

Whilst you are encouraged to be friendly towards our clients/customers it is important that people do not cross the professional boundaries. Individuals should maintain professionalism at all times and under no circumstances should become overfamiliar or fraternise with clients/customers in a way that may be seen to disrupt the operations or reputation of the business.

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Anyone found to have acted unprofessionally or inappropriately may be liable for disciplinary action in line with Company procedures.

#### 16. Alcohol and Drugs

Use of drugs and alcohol during working hours is not permitted. If an individual is suspected of use during working hours, they may be subject to disciplinary action under the Company's disciplinary policy.

Individuals must not be under the influence of drugs or alcohol during working hours and must not support or influence others to use alcohol or drugs. Individuals suspected of using or dealing drugs in the workplace will be reported to the police.

The Company may require drug tests to take place. If a person refuses to take a drug test this may lead to disciplinary action and may result in the termination of employment. Please refer to the Drug and Alcohol Policy for more information.

#### 17. Health and Safety

Any accidents, however minor they may appear, should be recorded in the Company's accident book in the first instance.

Each person is responsible for ensuring they are familiar with the Company's Health and Safety policies and procedures, including the consequences of breaching these.

If individuals are attending the premises of a third party or service user, they are required to familiarise themselves with the applicable policies and procedures.

Individuals should ensure they handle any hazardous materials with care.

Breaching any rules surrounding health and safety may lead to disciplinary action. A breach may be considered gross misconduct which can result in termination of employment.

## 18. Bribery

Bribery is the offering or accepting of any gift, loan, payment, reward, or advantage for personal gain as an encouragement to do something which is dishonest, illegal or a breach of trust. Bribery is a criminal offence. No gift should be given, nor hospitality offered by company representatives to any party in connection with the Company without receiving prior written approval from the line manager.

Individuals may face disciplinary action if it is discovered that they have accepted, offered, or given any bribe, which could include dismissal for gross misconduct. Accepting a bribe also carries separate criminal liabilities for the individual personally and for the Company.

The Company's anti-bribery policy contains more information on this area.

## 19. Modern Slavery

The Company is committed to conducting its business to the highest ethical standards and is dedicated to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain. We have a strong stance that our people, customers, supply chain and contractors must not participate, engage, or promote the trafficking of any person.

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All slavery and human trafficking laws must be complied with. Customers, contractors, and suppliers must ensure they have taken steps to ensure their business operations are free from slavery and human trafficking practices, both internally and within their supply chains and other external business relationships.

## 20. Flexibility

The Company may request, from time to time, that individuals work extra hours at short notice, subject to the needs of the business.

Individuals may also be requested to perform work which is additional to their usual duties and/or to carry out their role at a workplace other than their usual location of work.

These requests will be made to individuals as the need arises through their line manager.

## 21. Confidentiality

All information gained during the course of your employment is considered confidential, for the duration of your employment and post-employment. Individuals are expected to keep this information confidential, unless required by law not to do so.

## 22. Competing with the Company

Individuals who undertake external activities that place them, or could place them, in competition with the Company may be subject to disciplinary action.

If someone wishes to undertake other employment while employed by the Company, permission is required from the individual's line manager.

#### 23. Clothing

As individuals, you are liable to come into contact with customers and members of the public, therefore it is important that you present a professional image with regard to appearance and standards of dress. Where uniforms are provided, these must be worn at all times whilst at work and laundered on a regular basis. Where uniforms are not provided, you should wear clothes appropriate to your job responsibilities, and they should be kept clean and tidy at all times.

Upon termination of your employment, you will be required to return any uniform such as high vis jackets which has been provided to you.

#### 24. Identification Cards

Individuals who are based in the office must wear their ID cards in the workplace.

## 25. Property Equipment

Individuals who cause any damage to Company property through misuse, recklessness or carelessness may be required to repay to the Company the cost of repair or replacement. The Company reserves the right to recover this cost by way of a deduction from the next salary payment.

When a person's employment is terminated, they should return all Company property, including IT equipment, stationery, Company mobile phone, Company car/van and any other items belonging to the Company.

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When on a client's premises, individuals may not use the client's telephone, computer, post, or other services for personal purposes. Property or equipment may not be removed from a client without authorisation from the client with the person's line manager aware.

#### 26. Searches

The Company may require searches to be conducted of individuals, by authorised persons. The Company may reasonably request to search clothing, bags, lockers, or vehicles.

The Company's authorised person will conduct the search, with an independent witness also in attendance. If someone refuses to permit such a search, the appropriate authorities may be contacted to carry out the search for the Company.

Failure to permit to a search may lead to disciplinary action. A refusal may be considered a gross misconduct which can result in termination of employment.

## 27. Personal Property

The Company is not responsible for the loss, theft or damage to any personal property brought by people on to the Company's premises or stored in Company vehicles. Individuals are responsible for the security and safety of their personal possessions at all times.

Lost property should be handed in to reception, a Line Manager or the HR department if found.

## 28. Environment

The Company aims to keep use of consumables to a minimum by promoting the effective and efficient usage of equipment, facilities, supplies and services.

People should make every effort to reduce wastage, turn off excessive lights or heating/cooling equipment, use water resources appropriately and switch off any electronic equipment which is not in use.

## 29. Handling Money

Individuals that have been authorised to handle monetary transactions on behalf of the Company are responsible for those transactions they carry out.

If the Company suffers any loss due to a monetary transaction where the loss is caused by the carelessness or negligence of an individual, there will be a deduction from pay from that person's next salary payment to cover the loss suffered.

#### 30. Breaches

Breaches of the Company's code of conduct are likely to be regarded as an act of misconduct to be addressed under the Company's disciplinary procedure. Some of the above sections indicate the level of offence that could occur if breaches are found.

Signed:

Phil Munnelly, CEO