

# CODE OF CONDUCT

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## 1. Aims of this policy

- 1.1 This Code of Conduct applies to the Hills group of companies and relates specifically to the employee's employment with the relevant Hills group company.
- 1.2 Reference to the "Company" throughout this policy is reference to the relevant Hills group company.
- 1.3 This Code of Conduct does not form part of your contract of employment or other contract to provide services, and the Company may amend it at any time.
- 1.4 As an employee of the Company, you are involved in numerous day to day issues associated with the provision of a high-quality service. You must carry out your duties in a professional manner which will help to maintain public confidence and trust in the work we do.
- 1.5 This Code of Conduct is designed to provide guidance about what is expected from you in your daily work and in your dealings with colleagues, contractors, suppliers, customers and the public.
- 1.6 The Code of Conduct provides a framework for the decisions, actions and behaviour of your work as an employee. If you find yourself in a situation where there is no clear agreement on what is "the right thing to do", you can:
  - refer to this Code of Conduct and/or any applicable guidelines, policies, and procedures; and/or
  - discuss the situation with your line manager; and/or
  - contact the HR Team
- 1.7 This Code of Conduct should be read in conjunction with the Company's other policies and procedures including:
  - Anti-harassment, Sexual harassment and Bullying policy
  - Data protection policy
  - Disciplinary policy and procedure
  - Drug and alcohol policy
  - Equal opportunities policy
  - Health and safety policy
  - IT Acceptable use policy

- Relationships at work policy
- Sickness absence management policy
- Whistleblowing policy
- Work performance policy and procedure

## 2. **Who is it for?**

2.1 This Code of Conduct applies to all employees of the Company.

2.2 For employees who fail to comply with the Code of Conduct, further action may result in disciplinary action by the Company and could result in dismissal. For third parties (e.g. agency staff, contractors), unacceptable conduct or behaviour may result in your services being removed from the contract with The Hills Group.

## 3. **What does the Company expect from its employees**

3.1 Employees are expected to:

- attend work in a condition where they are able to carry out their duties safely and effectively;
- act honestly;
- act with dignity and treat all others with dignity and respect;
- work in accordance with the terms and conditions of their contract of employment and job description;
- follow all reasonable and lawful instructions related to their work;
- ensure that their behaviour and performance meet expected standards at any time whilst they are representing the Company or are likely to be identified or associated with their role as an employee of the Company (whether or not this is within working hours);
- comply with the Company's rules, policies and procedures at all times;
- provide courteous, efficient and impartial service delivery to all groups and individuals within the community;

- deliver quality services to the Company's customers and service users; and
- comply with and act in accordance with the Company's values and ethics.

#### **4. Equal Opportunities**

4.1 The Company are an equal opportunities employer and do not discriminate on the grounds of gender, sexual orientation, marital or civil partner status, pregnancy or maternity, gender reassignment, race, colour, nationality, ethnic or national origin, religion or belief, disability or age. For further information, employees should refer to the Company's Equal opportunities Policy.

#### **5. Smoking on Company property**

5.1 In compliance with the Health Act 2006, smoking is prohibited in all enclosed and substantially enclosed premises in the workplace or in any area displaying non-smoking signage. This applies to all employees, customers and visitors and applies to all Company owned or leased vehicles or vehicles used to transport employees. The Company applies the same restrictions to the use of e-cigarettes.

5.2 Individuals may only smoke on Company property within areas identified by Company signage as permitted smoking areas or public areas.

#### **6 Health, safety and wellbeing**

6.1 All employees have a personal and legal responsibility under the Health and Safety at Work Act 1974 for themselves, colleagues and other visitors to the Company's buildings and premises. Employees should consult the Company's Health and Safety policy for further information.

6.2 Any activity that presents a significant risk to the health, safety or wellbeing of an employee or other person must be subject to a written risk assessment. Employees must follow the resulting safe system of work or job safety assessment to ensure that their safety and that of others is not put at risk. If these are not in place, employees should speak to their line manager in the first instance or their health and safety representative.

6.3 Employees must:

- comply with all instructions by the Company in respect of workplace health and safety;

- ensure the proper and correct use of any personal protective equipment;
- not willfully or recklessly interfere with or misuse any equipment provided by the Company;
- not willfully or recklessly place the health and safety of any person at the workplace at risk;
- not willfully injure themselves;
- report any workplace hazards to their supervisor or line manager; and adhere to the Near Miss reporting process
- ensure that they comply with all rules, guidelines and procedures given by the Company.

## **7. Other employment / Outside business interests**

- 7.1 Employees may be prevented from undertaking other employment (in addition to their employment with the Company) and/or partaking in certain outside business interests without the prior written consent of the Company. “Other employment” may include undertaking freelance work, a second job with a different employer, public duties and voluntary work. Employees should consult their contract of employment and speak to the HR Team for further information.
- 7.2 If an employee wishes to pursue other employment and/or partake in outside business interests, they should speak to their line manager in the first instance prior to engaging with any such activity. Employees may be required to complete an Employee Declaration Form, which is available on Etouch.

## **8. Use of authority**

- 8.1 Employees must not induce others to improperly influence a decision or action and must not use their official position, status, powers or authority to seek to improperly influence a decision or action.
- 8.2 When exercising a discretionary power, employees must ensure that the power is being used properly, impartially, equitably and is consistent with relevant legislation, delegated authority and Company procedures and guidelines.

## 9. **Conflict of interest**

- 9.1 A conflict of interest exists when an employee's personal interests are inconsistent with those of the Company and create conflicting loyalties. An employee's activities or the activities of their relatives or associates may create a conflict of interest.
- 9.2 Employees should always act in the best interests of the Company and are expected to avoid conflicts of interest and must not use their position to improperly confer an advantage or disadvantage on any person. If a conflict of interest occurs between an employee's private interests and circumstances and work duties, they must resolve the conflict in favour of their work duties.
- 9.3 If an employee's personal views or circumstances conflict with the performance of their official duties or if they believe that they cannot act impartially, they should inform their line manager in writing as soon as possible.
- 9.4 Employees will be required to comply with any reasonable request from the Company to provide additional information relating to their personal interests to assess any risk of a conflict of interest.
- 9.5 Examples of a conflict of interest may include (but are not limited to):
- Having a financial interest in a company that competes with or does business with the Company;
  - Holding a position of director, officer, employee, worker or consultant at a company that competes with or does business with the Company;
  - Employees influencing funding allocations or accepting appointments to senior management positions for personal benefit;
  - Employees who have access to computer databases and update their own personal records or those of close relatives for personal benefit;
  - As a 'purchaser', liaising with a supplier who employs an employee or one of their close relatives;
  - Employees being contracted to provide services to the Company outside of their paid employment;
  - Generating work which involves travel to provide an opportunity to visit friends or relatives;
  - A supervisor or manager who approves higher duties and/or benefits to a subordinate where a close personal relationship exists (such as a partner or family member or close personal friend);

- Involvement with an interview panel when a relationship exists with one of the applicants; and
- except as specified in paragraph 10; an employee or their family member benefitting directly or indirectly financially, or by way of a gift.

## **10. Corporate hospitality and gifts**

- 10.1 Bona fide hospitality is a recognised part of the Company's business provided the purpose is to present the Company's services and establish and maintain business relations.
- 10.2 Employees must seek the prior written consent of their divisional Group Director or Chief Executive prior to offering any corporate hospitality and/or gifts. The Chief Executive and Group Director must report offers of corporate hospitality and/or gifts to the Chairman. The Chairman must report such offers to the Chief Executive.
- 10.3 The offer and giving of corporate hospitality and gifts should not be:
- to events or be gifts solicited by the individual concerned;
  - in a manner or frequency that could be construed as an inducement;
  - to obtain an improper advantage for the business;
  - in the form of cash or benefits in kind;
  - to obtain personal or indirect financial gain; or
  - be in return for a reciprocal offer of corporate hospitality or gift.
- 10.4 Employees may accept receipt of corporate hospitality provided it is reasonable in nature and is for the purposes of fostering business relations. Circumstances that may be reasonable include occasional lunches and dinners with existing and prospective customers and suppliers and occasional attendance at sports, theatre, and other cultural events. Employees must immediately report any such offer of corporate hospitality to their line manager.
- 10.5 If a customer or supplier offers to cover a member of employee's travel and/or accommodation costs for the purposes of attending a corporate hospitality event, the employee should first obtain prior written approval from their line manager.
- 10.6 Employees should not accept any gift made by any current or prospective customers or supplier that is not a business-related product or which is excessive in value. Employees must immediately report any such gift to their line manager. Modest seasonal gifts, for example a box of chocolates or a bottle

of wine) may be accepted on the basis that they are not excessive in value. If a member of their team is in receipt of numerous individual seasonal gifts their line manager may reasonably request that the individual concerned fairly share seasonal gifts with other members of the team.

- 10.7 Employees may only accept gifts that are delivered to their normal place of work.
- 10.8 The Company may, in its sole discretion, permit an employee to accept an offer of corporate hospitality and/or gift(s) and may in exceptional circumstances consider waiving restrictions under this paragraph with the approval of the Group Board
- 10.9 Where the Company sponsors an event or service, no employee (or their partner, spouse or relative) may directly or indirectly benefit from the sponsorship. Employees must seek guidance from their line manager if they are involved with any event or service that the Company proposes to sponsor.

## **11. Conduct outside working time**

Generally, what employees do outside work is their own concern, but they must avoid doing anything that might adversely affect the reputation of the Company or bring the Company into disrepute. Employees should consult their line manager if they have any questions regarding this.

## **12. Criminal charges and convictions**

- 12.1 The Company requires all applicants to disclose all contraventions of, or failures to comply with, any provisions of law, whether committed in the UK or elsewhere, unless the Rehabilitation of Offenders Act applies, and the rehabilitation period has expired. In some circumstances, a Disclosure and Barring Service (DBS) check may be conducted for certain job roles within the company.
- 12.2 Employees must immediately notify the Company in writing if they are charged with or convicted of any offence, regardless of whether the conviction is subject to appeal. Failure to notify the Company as outlined above will constitute grounds for disciplinary action.

## **13. Use of Company property, facilities and equipment**

- 13.1 Employees must use company property, facilities and equipment for legitimate business purposes only and not for personal benefit unless they have obtained prior written consent from their line manager for such use. The use of any

Company funds or assets for any unlawful or improper purpose is prohibited. For further information employees should consult the Company's IT Acceptable Use Policy.

#### **14. Confidential information**

- 14.1 Confidential information may include (but is not limited to) information relating to the Company's business, products, affairs, finances, trade information and technical data.
- 14.2 During an employee's employment or engagement, they may have access to information that is confidential to the Company. Employees must not use or disclose confidential information that is not in the public domain without the prior written consent of their line manager or unless they are required to do so by law. Breach of confidentiality may be considered a disciplinary offence, which could result in dismissal.
- 14.3 The Company may require employees to sign a confidentiality agreement prior to disclosing confidential information to them.
- 14.4 Employees will be required to maintain confidentiality after the employment or engagement ends.

#### **15. Data protection**

- 15.1 Employees must comply with the Company's Data Protection Policy and related procedures when processing data on behalf of the company or transferring data externally to third party processors. Special consideration and care must be taken if the data being processed includes sensitive or personal data. For further information please see the company's Data Protection Policy.
- 15.2 If an employee becomes aware of a situation, whether it be inadvertently, in error or without appropriate authorisation, where company owned data has been disclosed, sent, transferred or copied to a third party; or has been lost or permanently erased from company records then the matter must be reported without delay to the company's data protection officer in accordance with the company's Data Breach Policy.
- 15.3 Failure to comply with the Company's data protection policy may be dealt with under the Company's disciplinary procedure which could result in dismissal.

#### **16. Intellectual property**

- 16.1 Intellectual property refers to creations of the mind including inventions, literary works, artistic works and designs and can include patents, copyrights, trademarks and trade secrets. The Company owns the copyright in material

made by, or under its direction. Copyright in material an employee produces in the course of their employment or engagement, or with company assets or know-how, belongs to the Company, unless otherwise provided for in the employee's contract of employment or in a separate agreement with the Company.

## **17. Public comment**

- 17.1 Public Comment includes any comment made in the public domain including but not limited to, public speaking engagements, comments on radio or television, letters to newspapers, and expressing views in books, journals, notices, online or via social media.
- 17.2 Unless expressly authorised to do so, employees should not make any public comment on behalf of the Company. All requests for public comment on behalf of the Company should be directed to the Company's Communications Team.
- 17.3 Employees making authorised public comment on behalf of the Company must:
- ensure that it is part of their official role;
  - not misrepresent the facts concerning Company policy or administration;
  - only make such comments as they are authorised by the Company to make; and
  - not disclose information in breach of Company confidentiality or the Company's data protection policy.
- 17.4 Employees should refrain from making any public comment about the Company or its affairs. If an employee makes public comments about the Company they must make clear that their comment is made in a personal capacity or on behalf of the trade union or association they represent, and that it is not made on behalf of the Company.

## **18. Dress standards**

Employees are expected to dress in a manner that is appropriate for the workplace and reflects the health and safety requirements applicable to their job and work environment. Where protective personal equipment is issued to an employee, they must ensure they use it where appropriate. An employee not wearing the appropriate personal protective equipment will be considered to have breached the Company's health and safety policy and may be subject to disciplinary action.

## 19. Reporting breaches of the Code of Conduct and Whistleblowing

If an employee is concerned about any practice which they consider conflicts with the Code of Conduct, they should obtain advice from their line manager in the first instance. Where an employee feels unable to approach their line manager they should raise their concern with their divisional Group director, (or for Hills Group employees the Chief Executive). Alternatively, employees may utilise the Company's 24-hour whistleblowing hotline. Further information is available in the Company's whistleblowing policy.

<b>VERSION CONTROL</b>				
<b>VERSION</b>	<b>DATE</b>	<b>OWNER</b>	<b>CHANGES MADE</b>	<b>REVIEW DUE</b>
V4.1	01/05/2026	Director - HR	Review-no changes.	01/05/2029