

## CODE OF CONDUCT POLICY

### Introduction

The purpose of the Code of Conduct Policy is to provide a clear framework within which employees of Pier Training are expected to conduct themselves. Pier Training expect employees to be scrupulously impartial and honest in all affairs relating to the company and their job within it. Employees act as ambassadors for the company in terms of their general conduct both within and outside the organisation. This policy outlines the responsibilities of employees.

The duties of an employee are embodied in Common Law and built on by Statute e.g., the Equality Act 2010, The Health and Safety at Work Act, The Prevention of Corruption Acts 1906 and 1916 etc.

Under Common Law the duties of an employee are as follows:

- to be ready and willing to work;
- to offer their services personally: for example, must not subcontract the work for which they are employed;
- to take reasonable care in the exercise of that service, including the duty to be competent at work and to take care of the company's property;
- to not wilfully disrupt the company's business;
- to obey reasonable orders as to the time, place, nature and method of service;
- to work only for the company in the company's time;
- to disclose information to the company relevant to the company's business: for example, that they might know or discover;
- to hold solely for the company the benefit of any invention relevant to the business on which the company is engaged;
- to respect the company's trade secrets;
- in general, to be of good faith and do nothing to destroy the trust and confidence necessary for employment;
- to account for all benefits – monetary or in kind - received during employment;
- to not give or receive bribes or otherwise act corruptly;
- to indemnify the employer for loss caused by the employee.

United Kingdom Statute places further responsibilities on individual employees regarding their own behaviour and their behaviour towards other employees.

### Bribery and Corrupt Behaviour

The company has a strict anti-bribery and corruption policy in line with the Bribery Act (2010). A bribe is defined as giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.

If an employee bribes (or attempts to bribe) another person, intending either to obtain or retain business for the company or to obtain or retain an advantage in the conduct of the company's business, this will be considered gross misconduct. Similarly, accepting or allowing another person to accept a bribe will be considered gross misconduct. In these circumstances, the employee will be subject to formal investigation under the company's disciplinary procedures, and disciplinary action up to and including dismissal may be applied.

### **Gifts and Hospitality**

In addition to the duties placed on employees by Civil and Statute Law, the company requires its employees to ensure that gifts and hospitality offered by suppliers and potential suppliers of goods and services to the company are declined. This applies, whether the gifts or hospitality are offered within or outside normal working hours. The only exceptions to this are trivial gifts with a nominal value of less than £10 such as a calendar, diary, chocolates or mugs. All other gifts must be politely refused or, if received through the post, returned to the donor with a suitably worded letter signed by the Line Manager.

### **Transaction of Private Business**

Employees having official dealings with contractors and other suppliers of goods or services must avoid transacting any kind of private business with them by any means other than the company's normal commercial channels. No favour or preferences about price, or otherwise, which is not generally available, should be sought or accepted.

### **Attendance at Luncheons, Receptions etc**

Where it is evident that the work of the company will be facilitated, invitations to attend receptions, luncheons may be accepted under the following rules:

- no employee may accept an invitation without first obtaining the approval of the Managing Director;
- in exceptional circumstances, where it is not possible to seek prior approval, the facts should be reported immediately afterwards;
- if addressed personally, such an invitation may not be transferred to another employee, except with the consent and approval of a senior manager as above and with the concurrence of the party issuing the invitation;
- invitations involving attendance outside normal working hours may be accepted only on the authority of the Managing Director;
- as a rule, any employee who has any doubts about the wisdom of accepting any hospitality should decline the offer.

NB the important difference between, for example, attendance in an official capacity at a function organised by the company or one of its subsidiaries and the acceptance of hospitality from a private individual or firm should be recognised.

Nothing more than a small, low-value item such as a calendar, diary, blotter, chocolates or flowers can be accepted. All other gifts must be politely refused or, if received through the post, returned to the donor with a suitably worded letter.

## **Confidentiality**

At all times confidentiality must be maintained. No information can be released to unauthorised persons or organisations. The Managing Director of the company will inform employees of those authorised to receive information.

If doubt exists as to the validity of an organisation or individuals to receive information, this must be checked with the Managing Director.

## **Data Protection**

Pier Training holds and processes information about employees and apprentices for administrative and commercial purposes. When handling such information, the company and employees who process or use any personal information must comply with the Data Protection Principles which are set out in the Data Protection Act 2018. See Data and Information Security Protection policy.

## **ICT Use and Protection**

Pier Training's information and communications technology (ICT) resources include telephones, mobile phones, smartphones, personal computers (PCs), laptops, notebooks, tablets, photocopiers, printers, the internet including SharePoint. Misuse can lead to inefficiencies, risks and liabilities; therefore, it is essential that employees understand their responsibilities which are set out in the ICT Use Protection, Policy and Procedures.

## **Personal Relationships**

If a personal relationship between two employees develops within the working environment, the onus is on the senior employee concerned to bring this to the attention of his or her manager to confirm that there is no conflict of interest, nor will a conflict of interest arise. The company reserves the right to move one of the employees concerned if it deems it necessary to do so.

## **Equality, Diversity and Inclusion**

The promotion of 'inclusivity and valuing diversity' is a core value of Pier Training. The company seeks to ensure that the work environment for its employees is supportive, and one where individual respect is shown to all. All members of staff and apprentices, regardless of their age, (dis)ability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, ethnic background, culture, sexual orientation, religion or belief, sex, socio-economic status or any other factor will be supported and encouraged to perform to their potential.

## **Harassment and Bullying**

Pier Training is committed to ensuring that everyone is able to work and participate in learning without fear of harassment, bullying or intimidation. Pier training strive to provide an environment in which apprentices and employees are able to flourish and achieve their full potential. Employees and apprentices have a responsibility to ensure that their own behaviour, whether intentional or unintentional, does not constitute harassment. Pier Training will take action against inappropriate behaviour which shows lack of respect for others, or which leads people to feel threatened. See the Bullying and Harassment Policy.

## **Dress Code**

Employees must ensure that their dress is appropriate for the situation in which they are working and that they present a professional image.

## **Outside Interests and Employment**

Outside interests include directorships, ownership, part ownership or material shareholdings in companies, business or consultancies likely to seek to do business with Pier Training. These should be declared to the individual's line manager as should the interests of a spouse/partner or close relative.

## **Political and Civic Activities**

It is not the intention of Pier Training or this policy to dissuade employees from participating actively in public duties. It is important, however, that by doing so there is no suggestion to a third party that the employee is acting on behalf of, or with the support of Pier Training. To avoid any misunderstanding, no company employee should permit his or her company affiliation to be noted in any outside organisation's materials or activities without the express written approval of the Managing Director.

## **Misuse of Drugs and Alcohol**

It is a disciplinary offence to be on Pier Training premises and/or carrying out official duties when under the influence of alcohol or non-medically prescribed drugs.

## **Gambling**

Gambling activities must not be conducted on Pier Training premises; discretion may be used in relation to small raffles for charitable purposes, national lottery syndicates, occasional sweepstakes etc.

## **General Conduct**

Employees should always conduct themselves in such a way as to enhance the reputation of the company.

Pier Training will support employees who become aware of and are willing to report breaches of this policy or who genuinely believe that a breach is occurring, has occurred or is likely to occur within the business. Employees should raise the issue internally with their manager or supervisor or in accordance with the company's Whistleblowing Policy.

These standards of conduct are intended to underpin and clarify standards required by the company of its employees and form a fundamental part of the employment contract. Staff who fail to comply with the guidance detailed in this policy could be subject, following a full investigation, to disciplinary action up to and including dismissal. If through their actions or omissions staff are found to be in contravention of either this Policy or, indeed, their legal responsibilities, then the company reserves the right to take legal action if it deems it to be necessary to do so.

## POLICY REVIEW

### How will this policy be reviewed?

The Commercial and Operations Manager (COM) is responsible for the implementation and review of the Code of Conduct policy. This review is completed annually or when considered necessary to ensure they remain effective and legally compliant. The date of review is also recorded within the footer of the document and includes the date of the next required review. This enables the COM to easily track when the last review was completed ensuring the policy is relevant and up to date.

Following a review by the COM, it is shared with the Quality Assurance Manager and Directors (SMT). The senior management team (SMT) read the policy, make any suggestions for amendments and then it is finally approved by the Managing Director.

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