



AUTOMOTIVE & INDUSTRIAL COMPONENTS



POLICY



CODE OF CONDUCT

SUBJECT:
Code of Conduct Policy

ISSUE No: 1
REVISION NO: N/A
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Code of Conduct

Introduction

What is a Code of Conduct

A code of conduct is a defined set of rules, principles, values, employee expectations, behaviours, and relationships that we as a business consider important and believe are necessary for our success. The code can contain the organisation's statements of principles and commitment as to how we shall conduct our business as well as what standards of conduct, behaviour and relationships are expected from its employees and workers.

A code of conduct should list the principles and ideas that distinguish our business and reflects on our culture, providing a foundation for ethical decision-making within the Company and clearly demonstrating a message that all employees, associated workers and stakeholders can use for reference.

Who does it apply to

This Code of Conduct applies to our employees and all associated workers, below is the reason why.

In order for our business to operate efficiently and effectively, we must have many successful but differing working relationships other than with our employees. Everyone who has a vested interest in a business are known as 'stakeholders', and this includes our employees but there are many others. Firstly there are those who are considered 'other or associated workers' whose services are essential to our business, comprising of agency workers, consultants and contractors. Our customers and suppliers are also stakeholders, therefore, how we conduct our business and our ongoing success and growth is vital to them, consequently they will have an interest in this Code of Conduct.

Types of codes of conduct

- **integrity** - the quality of being honest and having strong moral principles;
- **objectivity** - the quality or character of being objective, lack of favouritism toward one side or another, freedom from bias, treating everyone the same and equally, regardless of position;
- **competence** - the ability to do something successfully or efficiently;
- **confidentiality** - Confidentiality at work involves keeping verbal and written information private and, reserving authorized restrictions on access and disclosure, including means for protecting personal privacy, data and proprietary information (relating to an owner or ownership of the information);
- **professionalism** - an individual's adherence to a set of standards, code of conduct or collection of qualities that characterise accepted practice within a particular area of activity - the ability of an individual to consistently apply and fully deliver all of the above principles in their everyday work and activities, regardless of position.

Purpose

Our Code of Conduct describes the principles, as stated below, by which Olympus Global expects its employees to conduct its business and has been created to help you understand our core values and the behaviours expected to support them. It provides guidance and support for every employee, with high standards of ethical behaviour and compliance with applicable laws and regulations being essential to protecting the reputation and ongoing success of our business.

The Code deals with a wide variety of issues and situations relating to workplace conduct, but it is not intended to be exhaustive. The overall ethos contained within this code should provide the reader with a significant overview as to our expectations and what is appropriate in the workplace.

Breaches of the Code

For the avoidance of doubt, it is not a contractual document and the Company reserves the right to amend it at any time. The Code will be subject to regular review, particularly in the light of new and relevant legislation.

Employees, workers, consultants, contractors and stakeholders are required to adhere to this Code of Conduct.

It must be read at Induction and signed/dated to state that it is understood and will be adhered to.

Managers and supervisors have a responsibility to demonstrate appropriate behaviour and ensure that all employees and workers understand and comply with this Code of Conduct.

Any queries or concerns about the expectations within this Code of Conduct must be raised immediately with your Manager, the Operations Director or Human Resources.

The contents of this policy and the examples stated are not exhaustive, if you need clarity, please ask the Operations Director or Human Resources. Breaches of this Code of Conduct may result in disciplinary action, termination of employment and, where appropriate, referral to other agencies such as the police.

To whom you should report concerns

Throughout this policy you will be asked to report matters to your manager, however this should always be read as your manager, a director (most often the Operations Director) or the person responsible for Human Resources.

Principles of the Code

This Code of Conduct sets out principles by which Olympus Global is bound. These principles are as follows:

- We comply with laws and regulations.
- We reject bribery and corruption and avoid being compromised by gifts and entertainment.
- We avoid conflicts of interest.
- We respect the confidentiality of personal and corporate information.
- We promote diversity and equality and treat people fairly and with respect.
- We maintain a safe and healthy environment for people to work in and are proactive in managing our responsibilities to the environment.
- We support those who have any suspicions of any misconduct, malpractice, illegal or unethical behaviour and report their concerns in confidence to the appropriate channels.

These principles are outlined in more detail in the Code below. Several of the principles and standards outlined in the Code are supported by more detailed specific policies in the Employee Handbook. These policies are referred to in the Code.

Zero Tolerance

While this Code gives guidance to employees in certain situations, there are specific areas where Olympus Global has a policy of zero tolerance. These are:

- unsafe, illegal or unethical working practices
- violence and aggression
- discrimination, bullying and harassment
- bribery and corruption
- retaliation or action against anyone who speaks up and, in good faith, reports a wrongdoing.

Any breach of the Code will be considered a disciplinary matter, which could result in disciplinary up to and including dismissal.

Code of Conduct Examples

The guidance in this Code of Conduct is organised into separate sections.

- Laws and regulations
- Financial probity
- Conflicts of interest
- Data protection
- Standards of personal behaviour
- Health, safety & security
- Environment
- Raising concerns through confidential reporting

As already mentioned, a number of the principles outlined in this Code are supported by more detailed policies found in the Employee Handbook. Reference to the relevant policy is given at the end of the particular guidance. All employees are required to comply with these policies.

OUR CODE OF CONDUCT

COMPLIANCE WITH LAWS and REGULATIONS

The Company is committed to abiding by all applicable laws, rules and regulations in the countries in which we operate. All employees and associated workers during the course of their work must also follow all applicable laws, rules and regulations.

The Company will always take appropriate action against those who carry out unlawful activities to include disciplinary action and where applicable matters will be reported to the police.

If you believe there is any discrepancy or you have concerns or queries about the legality of your own, behaviour of a colleague, or any other associated worker's actions, you must raise the matter with your manager. It is our policy that staff who raise concerns in good faith shall not suffer any kind of punishment or retaliation.

FINANCIAL INTEGRITY

Compliance with the law

The financial operations of our business, employees and all others to whom this Code applies must observe UK laws and regulations and should be transparent and accountable. Olympus Global shall maintain accurate financial records and take whatever steps are necessary to identify and prevent fraud, money laundering and other financial crimes.

Employees who raise concerns about whether conduct complies with the law and with the Code should immediately bring it to the attention of their manager. It is our policy that staff who raise concerns in good faith shall not suffer any kind of punishment or retaliation.

Bribery and corruption

Olympus Global does not permit, in accordance with the provisions of the Bribery Act 2010, the bribery of any person involved in its business. Employees must not authorise, offer, promise or pay or receive a bribe designed to secure an unlawful advantage. The amount of the bribe is irrelevant. In some circumstances, excessive hospitality or gifts may be regarded as offering or receiving a bribe. An employee should always check with their manager/a director if in doubt and before acting on the presentation of gifts or accepting invites etc.

Invitations of hospitality and gifts that are presented to staff by suppliers or customers, contractors etc, should always be declared to your manager.

The Company has a full anti Bribery and Corruption Policy

Fraud

Fraud is not tolerated by the Company in any form.

Any attempt to secure an unlawful gain will lead to disciplinary action and sanctions up to and including dismissal. A report will also be made to the relevant authority which could lead to prosecution.

The Company will always seek to recover loss resulting from fraud.

Errors

The Company recognises that genuine errors happen however, employees should not attempt to make covert corrections as the operation of the business could be placed at risk, specifically when relating to sales and accounting. Errors should be reported to your manager immediately.

CONFLICTS of INTEREST

A conflict of interest can occur when an individual's personal interests, activities, practices or conduct – family, friendships, financial, social factors, or other employment – conflicts or appears to conflict with, the interests of the Company, its customers, or its suppliers or could compromise his or her judgment, decisions, or actions in the workplace. Other definitions are:

- a situation in which the concerns or aims of two different parties are incompatible
- a situation in which a person is in a position to derive personal benefit from actions or decisions made in their official capacity.

It is important that, where decisions are made which have a significant effect on the Company and others, they are taken in a fair and balanced way. Any potential conflicts of interest must be declared so that individuals are not involved in decisions that could be regarded as biased.

Employees are expected to represent the Company in a positive and ethical manner.

Employees may not accept any employment relationship with any organisation that does business with, or competes with, the Company. This includes serving as an advisor to any such organisation, unless said activity is conducted in the capacity of a representative of the Company.

Conflicts, or potential conflicts of interest must be brought to the attention of your manager immediately. If you are unsure as to whether you may have a situation which is a conflict of interest you must ask to discuss the matter with your manager.

DATA PROTECTION

The General Data Protection Regulation and the Data Protection Act 2018 comprise the data protection regime that applied in the UK from 25 May 2018. This regime supersedes any previous legislation.

The Company holds and processes information on its staff and other data subjects for commercial and administrative purposes. It will only collect and handle data for "legitimate interest" and in compliance with the data protection regime above. Access to personal data is limited and controlled.

For further information, employees should refer to the Data Protection policy.

Confidentiality

The Company is committed to the maintenance of the highest level of integrity in all its dealings with clients, customers and staff. This extends not only to commercial confidentiality but also to the protection of personal information received in the process of providing a service.

Employees are expected to treat internal company, customer, supplier and any other stakeholder property and information with care, respect and where applicable sensitivity and must maintain the privacy and security of the same information and keep details confidential.

Managers and on occasion some staff members will at times be privy to certain confidential information which may relate to Company business, suppliers, customers or otherwise. Such information is to remain confidential unless a direction is given by a director or Human Resources for it to be open knowledge. Each party is expected by the other to adhere to what is agreed, Mutual Trust is, therefore, implied.

Employees are required to report all suspected privacy and security incidents and breaches immediately. Anyone who, in good faith, reports a suspected Privacy, Security, or Employee Misconduct incident or breach will be protected from retaliation.

Any breach of confidentiality will be investigated and may result in disciplinary action which in turn may end in termination of employment

STANDARDS of BEHAVIOUR

Professional Conduct

Employees are expected at all times to exercise utmost discretion and conduct themselves in a professional manner directed at promoting the best interests of the Company, avoiding any action, that might adversely affect or publicly discredit the Company, interfere with operations, be offensive to customers, suppliers or colleagues or act in a manner which may be perceived as negative. This duty, to act professionally, encompasses all activities both in the actual workplace and when working/travelling externally to customers or suppliers.

Employees and associated workers, shall at all times be courteous and considerate to colleagues, customers, suppliers and any other persons with who they are likely to be dealing with.

Any behaviour or conduct which is not acceptable to the work environment, Company policies are ignored or there are instances of conduct which is inappropriate, unsatisfactory or unacceptable to the Company, may subject the individual to strict disciplinary action, which may result in the termination of employment.

Equality, diversity and inclusion

An important core value of the Company is the promotion of inclusivity and diversity. We seek to ensure that the workplace is supportive of its staff and one where individual respect is shown to all members of staff, regardless of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, ethnic background, culture, sexual orientation, religion or belief, sex or any other factor. All employees will be supported and encouraged to perform to their potential.

For further information, employees should refer to the Equal Opportunities policy.

Bullying and harassment

The Company has zero tolerance to bullying and harassment.

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

For further information, employees should refer to the Bullying and Harassment policy.

Further standards for professional conduct can be found in Appendix A.

HEALTH, SAFETY and SECURITY

The Company places a high priority on providing a safe workplace and minimising the risks identified by the Health and Safety at Work Act 1974 and associated legislation.

Effective safety management requires the active involvement of every employee and every employee has a legal duty of care to look after their own health, safety and welfare and that of those around them.

Employees must not act in a manner liable to place themselves, colleagues or any other workers or contractors at risk.

All employees are provided with an Employee Safety Handbook which they have a duty to read and to which they should refer on a regular basis.

ENVIRONMENT

The Company is certified to the ISO 14001 environmental standard and is committed to preventing, or, at the very least, minimising, any harmful effects it causes to the natural environment. It encourages all employees to conduct their work in accordance with the highest environmental practices and the minimising of waste.

RAISING MATTERS OF CONCERN: CONFIDENTIAL REPORTING PROCEDURE

Employees who become aware of activities which they believe, in good faith, are illegal, improper, unethical or otherwise inconsistent with this Code, may report the matter, often known as “whistleblowing” to their manager in accordance with the requirements of the Public Interest Disclosure Act 1998.

Any individual who raises such a concern in good faith and in line with the Company’s whistleblowing policy will not suffer any detriment or be penalised in any other way.

For further guidance on the issue and on the procedure, employees should refer to the Company’s Whistleblowing Policy.

WHO IS RESPONSIBLE FOR THIS POLICY

All managers have a specific responsibility for operating within the boundaries of this policy and ensuring their staff are aware of the requirements of this policy and are therefore in a position to conduct themselves in accordance with its contents. Managers should also ensure all enquires raised by staff in relation to this policy are referred to the Operations Director or Human Resources.

The person responsible for Human Resources will regularly review the policy and will inform all necessary employees of any changes.

POLICY MONITORING and REVIEW


This policy will be monitored for its effectiveness and a review will be undertaken as to its implementation as a minimum on a biennial basis. The review process will consider its suitability and whether it is sufficient for its purpose.

Information relating to Company policies, practices and procedures are related at the time of induction in the Employee Handbook. Further copies are available to employees and others via the Intranet HR/Policies.

Employees are invited to comment on this policy and to put forward any suggestions as to ways in which the policy may be improved. Comments, suggestions or queries should be addressed to the Operations Director, in the first instance.

Changes to this policy will be notified by way of email and the placing of an updated version within the HR section, Policies on the Company intranet.

APPROVAL of DOCUMENTATION

Document Title:	Code of Conduct Policy	
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Approved:	Mr.Chris Round Operations Director	Signature: 
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Company info screen in reception	Yes/No	

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REVIEW SHEET FOR CODE of CONDUCT POLICY

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