

# Conduct and Standards Policy

**Starfish 9 Ltd. Conducts & Standards Policy 2021 - Issue 2**

(Last Review Jan 2021 - Next Planned Review Jan 2022)

# Conduct and Standards

## What this policy covers

This policy applies to employees, workers and contractors.

This policy details the main standards of behaviour that you need to adhere to and also details the behaviours that the Company would normally regard as gross misconduct. The standards of behaviour and the details of gross misconduct listed in this policy should not be considered exhaustive.

## Your duties and responsibilities

You are under a duty to comply with the standards of behaviour required by the Company and to behave in a reasonable manner at all times.

### Attendance and Timekeeping

You must:

- Comply with the rules relating to notification of absence set out in the company's absence procedure
- Arrive at work promptly, ready to start work at your contracted starting time
- Remain at work until your contracted finishing time
- Obtain management authorisation if for any reason you wish to arrive later or leave earlier than your agreed normal start and finish times

The Company reserves the right not to pay you in respect of working time lost because of poor timekeeping.

Persistent poor timekeeping may result in disciplinary action.

### Conduct Standards

You must:

- Maintain satisfactory standards of performance at work
- Comply with all reasonable management instructions
- Devote the whole of your time, attention and abilities to company business and its affairs during your normal working hours
- Co-operate fully with your colleagues and with management
- Take all necessary steps to safeguard the company's public image and preserve positive relationships with all persons and organisations connected to the company

- Ensure that you behave in a way that does not constitute unlawful discrimination
- Comply with the company's operating policies and procedures

### Honesty and Openness

We operate in an open environment and expect you to treat each other with a spirit of honesty and openness.

Wherever possible and appropriate, we should be willing to share information, making facts available when requested. Knowledge is most valuable when it is shared with others. Unnecessarily controlling information intended for general circulation, leads to speculation and rumour, which undermines the integrity of the organisation and the credibility of all our communication.

There are, however, times when you may be in possession of information, which is unpublished and price sensitive, the release of which could be useful to our competitors or even damaging to the company. On such occasions you should exercise discretion and always seek the advice and permission of a Company Director before conveying such information.

### Integrity, Fairness and Trust

Integrity, fairness and trust are critical to our business. All relationships are built on these foundations, therefore, we must at all times, treat people as we would like to be treated. Building relationships based on integrity and fairness will, in turn, lead to trust and respect.

### Ethicality

The highest standards of business ethics must be employed at all times.

In addition to the qualities previously referred to, our policies, particularly in the areas of employment, recruitment, promotion and training, are all non-discriminatory, in line with our Equal Opportunities and Diversity Policy as detailed in this handbook.

We will not abuse positions of authority to behave in a way, which is hostile or offensive to others. Similarly, financially or commercially sensitive information must never be used for personal advantage. If you have any doubts as to the effect or relevance of these requirements to you, then you should consult your Foreman or Line Manager.

### Politeness

In accordance with our Mission Statement it is vital that you are always customer focused irrespective of the job you hold. In addition some of our site workers often use language, which may be deemed by others to be rude, defamatory, insulting and vulgar and whilst we accept 'swearing' or 'vulgarity' can be the norm within the 'construction' industry, we WILL NOT tolerate such behaviour and/or conduct if the 'act':

- Offends another employee or colleague;
- Has discriminatory tones or implications;
- Offends or upsets a client or any client's employee(s);
- Is directly abusive, aggressive and/or destructive;

Whether it is occasioned by a fellow colleague, customer or other third party personnel. If you suffer any direct verbal abuse you must immediately report it to your Foreman or Line Manager.

### **Flexibility**

You may be required to work additional hours at short notice, in accordance with the needs of the business.

You may also be required to undertake duties outside your normal job remit and to work at locations other than your normal place of work.

### **Confidentiality**

You may not at any time during your employment with us or during a period of two years after its termination directly or indirectly divulge to any person, or use any confidential information of the Company or of any third party for which we have an obligation not to disclose, which may have come to your knowledge during your employment, without our prior written consent.

You may not retain or use for your own purposes nor for any purpose other than that of the Company, nor without permission (other than in the normal course of business) remove from the Company's offices any files, documents, disks, tapes or any other property, or any copies thereof which have been produced by Starfish 9 Ltd., or any other company so occupying the premises of Starfish 9 Ltd. for the purposes of conducting business.

You may not at any time during your employment by us or at any time thereafter, except as authorised by us divulge to any person, firm or company, any information regardless of its nature, relating to our employees, or any third party for which we have an obligation not to disclose.

You may not communicate either in writing or verbally with the Media (Press, TV, Radio etc), on matters concerning the Company's affairs or in any way refer to your position in the Company, or use our address without the prior written permission of the Company.

### **Criminal Convictions**

You will notify us promptly if you are convicted of a criminal offence. This does not apply to motoring offences not involving an endorsement of license, unless the motoring offence was committed whilst executing your duties on behalf of the Company. Failure to do so may be regarded as a breach of contract.

### **Conduct while representing the Company**

As a general rule, behaviour outside of normal working hours is a personal matter and does not directly concern the Company. However, there are some exceptions to this rule. The Company will become involved when incidents occur:

- At office parties or other work related social occasions or gatherings
- At social occasions or gatherings organised by a third party, where you have been invited in your capacity as a representative of the company
- At work related conferences
- While working away on business on behalf of the company

On these occasions you are expected to behave in an appropriate and responsible manner, keeping in mind that you are representing the Company. You are instructed specifically not to consume any alcohol at such events where you are driving.

If your conduct brings the Company into disrepute you will be subject to the Company's disciplinary procedure. Such behaviour may be viewed as a gross misconduct offence and could render you liable to disciplinary action up to and including dismissal without notice.

### Dealing With Client Complaints or Difficult Situations

Although we do our very best to please our clients and provide a high quality service, there may be times when you will have to deal with a customer's complaint or handle a difficult situation.

In such cases the matter should be handled empathetically and with a commitment to dealing with the matter, as such you should follow these rules:

Remember to introduce yourself and accept you own the problem. Never blame other colleagues or attempt to 'pass the buck'. Apologise for any inconveniences caused.

Listen and empathise. Be positive, maintain eye contact and avoid interrupting. Ensure the client only has to explain the situation once.

If you need to get help, ensure you do and communicate the nature of the problem to your Foreman or Line Manager. The client should never have to repeat him/herself twice.

Thank the client for drawing the problem to your attention.

If you didn't need help ensure you communicate the situation to your Foreman or Line Manager.

### Health and Safety

At all times, you must observe and comply with the law, such as the Health and Safety at Work Act 1974.

Your legal obligations are as follows.

- To take reasonable care for the health and safety of yourself and others.
- To co-operate with us in complying with the laws relating to health and safety.
- Not to intentionally or recklessly interfere with or misuse anything provided in the interests of health and safety.

If you knowingly and recklessly act in a way, which endangers yourself or others you may be guilty of an offence, which you could be prosecuted for.

It is your duty and responsibility to familiarise yourself with, and to comply with, the Company or any third party's health and safety policies and procedures. Breach of these rules may result in disciplinary action, up to and including the termination of your employment without notice for gross misconduct.

You must report all accidents, however minor, as soon as possible, making a comprehensive entry in the Company's Accident Book.

### Smoking and Vaping

To protect and enhance indoor air quality and contribute to the health and well being of all employees and visitors Starfish 9 Ltd shall be totally smoke and vape free.

Smoking and vaping is prohibited in all Starfish 9 Ltd. properties including company vehicles. Smoking, vaping or other use of tobacco products (including, but not limited to pipes, cigars, snuff or chewing tobacco) is not permitted in any part of company buildings or in vehicles owned, leased, or rented to the company.

No additional breaks beyond those allowed under the company's break policy may be taken for the purpose of using e cigarettes or tobacco products. Employees may

smoke outside the building during breaks but not in doorways or entrances. All employees must also strictly adhere to clients smoking policies.

There is still a lot we do not know about e-cigarettes. They are not risk free, but based on current evidence, they have a much lower risk than tobacco

Regardless of the potential health risks, second-hand aerosols from nearby vaping can also be a nuisance, since the e-cigarettes can include strong flavours and leave pungent odours.

All employees are expected to abide by this policy while at work, whether on company premises, at a customer's site, or in vehicles owned, leased or rented by the company. Failure to do so may result in disciplinary action.

### **Appearance**

Regardless of the job you do, you must ensure your appearance is appropriate for the task in hand. This is particularly important, where you come into close contact with the customer.

If your work requires you to work on site, protective clothing is provided to you, including safety hats and boots. When wearing such protective clothing, it is vitally important that you note the following:

The Company provides the attire to meet their statutory obligation under the Health and Safety at Work Act (HASAWA) 1974. However, any failure on your part not to wear the protective clothing breaches the HASAW Act 1974 given your responsibility to take reasonable care of yourself and others.

In consideration of point 3.10.1, we reserve the right to suspend you for failing to wear your safety wear.

We reserve the right to enact our Disciplinary Procedure for failure to comply with the HASAW Act 1974.

### **Garment Care**

If you are entrusted with protective clothing for the better execution of your duties, it is your responsibility to take reasonable care of the garment(s) as far as is reasonably practicable to do so. Wilful damage is not acceptable and will result in us seeking total reimbursement from you.

All protective clothing issued remains the property of the company and must be returned if and when you leave our employment, failure to do so will result in a full reimbursement being made by us.

### **Telephone Calls and Mobile Phones**

Personal calls are not encouraged at work and so must be kept to a minimum whilst on duty. Mobile phones, unless used in the course of your work or for an emergency, should be switched off and checked during break periods.

### **Property and equipment**

You are not permitted to make use of Company or a third party's equipment or services for personal purposes.

You must not remove property or equipment from Company or a third party's premises unless for use on authorised business or with the permission of management.

You must report immediately any damage to Company property, premises, plant or equipment used by you.

Where you damage property belonging to the Company either through misuse or carelessness, the Company reserves the right to make a deduction from your pay in respect of the damaged property.

On termination of your employment you must return all Company property, such as keys, laptops, mobile telephones, Company vehicles, documents or any other items belonging to the Company.

### Clear desk policy

To improve the security and confidentiality, you are required to ensure that when your workstation is unoccupied you take all necessary steps to clear your work station of any sensitive and confidential information.

This ensures that all sensitive and confidential information, whether it be on paper, a storage device, or a hardware device, is properly locked away or disposed of when a workstation is not in use. This policy will reduce the risk of unauthorized access, data protection breaches, loss of, and damage to information during and outside of normal business hours or when workstations are left unattended.

Whenever a desk is unoccupied for an extended period of time the following will apply:

- All sensitive and confidential paperwork must be removed from the desk and locked in a drawer or filing cabinet. This includes mass storage devices such as CDs, DVDs, and USB drives;
- All waste paper which contains sensitive or confidential information must be placed in the designated confidential waste bins. Under no circumstances should this information be placed in regular waste paper bins;
- Computer workstations must be locked when the desk is unoccupied and completely shut down at the end of the work day;
- Laptops, tablets, and other hardware devices must be removed from the desk and locked in a drawer or filing cabinet;
- Keys for accessing drawers or filing cabinets should not be left unattended at a desk.

Printers and fax machines should be treated with the same care.

### Personal searches

The Company may reasonably request to search your clothing, personal baggage, personal storage areas or vehicles. An authorised person must conduct any such search in the presence of an independent witness. Should you refuse such a request, the Company will require the appropriate authorities to conduct the search on behalf of the Company. Failure to co-operate with the Company in this respect may be treated as gross misconduct.

### Personal property

It is always advisable to avoid bringing personal belongings and/or excessive amounts of cash to work as we cannot be held liable for any loss or damage to personal property howsoever caused, especially where you work on site.

You are solely responsible for the safety of your personal possessions on Company premises and should ensure that your personal possessions are kept in a safe place at all times. If you find an item of lost property on the premises, you are required to inform management immediately.

## Personal Circumstances

You will notify us promptly of any change in your personal circumstances, e.g. address, name, next of kin, marital status, emergency information, etc.

## Environment

In order to provide a cost-effective service, you are requested to use Company equipment, materials and services efficiently. You should try to reduce wastage and the subsequent impact on the environment by ensuring that you close windows, avoid using unnecessary lighting or heating or leaving taps running, switch off equipment when it is not in use and handle all materials with care.

## Breach of this policy

A breach of the Company's standards of behaviour is likely to result in disciplinary action being taken.

## Gross Misconduct

Set out below are details of behaviour that the Company views as gross misconduct, which is likely to result in dismissal without notice. This list is not exhaustive. Such behaviour includes:

- Theft, dishonesty or fraud
- Deliberate recording of incorrect working hours
- Unauthorised absence
- Smoking on company or a third party's premises or in a vehicle belonging to the company
- Sleeping during working hours
- Assault, acts of violence or aggression
- Bullying
- Unacceptable use of obscene or abusive language
- Possession or use of or being under the influence of non-medicinal drugs or alcohol on company premises or during working hours
- Wilful damage to company, employee or third party property
- Serious insubordination
- Serious or gross negligence
- Bringing the company into disrepute
- Falsification of records or other company documents, including those relating to obtaining employment



- Unlawful discrimination, including acts of indecency or harassment
- Refusal to carry out reasonable management instructions
- Gambling, bribery or corruption
- Serious breach of health and safety policies and procedures
- Breach of confidentiality, including the unauthorised disclosure of company information to the media or any other party
- Unauthorised accessing or use of computer data
- Unauthorised copying of computer software

**Name:** John Jessimer

**Signed:** 

**Position:** Managing Director

**Date:** 7 January 2021

