



Employee Code of Conduct

1 INTRODUCTION

The purpose of this document is to set out the company's policy in relation to the Employee Code of Conduct.

This Code has been written for the effective operation of Owl Live's business and the wellbeing of its employees. All employees are expected to act in accordance with the Code and failure to do so may result in disciplinary action but for the avoidance of doubt, this policy does not form part of your contract of employment.

2 SCOPE

This policy also applies to work-related functions held outside of normal working hours, either on or off the company's premises, such as Christmas parties, leaving celebrations or working lunches.

Owl Live therefore reserves its right, from time to time, to change existing policies, procedures and rules or to introduce new ones which you will be required to observe.

Owl Live relies upon the professionalism, reliability and loyalty of its employees. Our clients, suppliers and other associated parties are entitled to expect the highest standards from all employees who work for Owl Live. The aim of this Code is to assist employees to perform effectively by ensuring the rules and standards of the organisation are clearly communicated. Also, to guide employees in their dealings with its clients, suppliers and other associated parties as well as other members of staff.

In striving to be excellent, it is necessary to be clear from the outset about the consequences if there is a breach of these rules. Failure to comply with the standards set out in this Code will be dealt within the scope of the Disciplinary and Capability procedure.

Who is this Code for?

The Code applies to all Owl Live employees. This Code also applies to those who work under a contract of service with Owl Live.

Review of the Code of Conduct

This Code will be reviewed in the event of any new developments in employment legislation. Reviews will be carried out in consultation with the recognised trades unions. All employees will be expected to review and sign it on an annual basis

Roles and responsibilities

All employees

It is the responsibility of all employees to read, understand and work in accordance with the Code of Conduct and to:



- Maintain conduct of the highest standard such that client, supplier and other associated parties' confidence in their integrity is sustained, and to be open, fair and honest in all activities at work
- Ask for clarification on any aspects of the Code where there is uncertainty
- Inform the organisation and record in the event that a gift or hospitality has been offered or refused
- Incorporate and promote equality and diversity
- Inform your line manager in the event that a financial or personal interest arises during the course of employment

Senior Managers – all the above points plus:

- Set a positive personal model of behaviour for staff; lead by example in modelling behaviours, ways of working and practices that support the highest possible standards set out in the Code and the values underpinning it
- Ensure that standards in this Code are established and communicated
- Provide clarification on areas of the Code to improve employees' understanding
- Assess employee performance in relation to this Code and give feedback
- Take appropriate action at the earliest opportunity to deal with non-compliance with the standards of this Code
- Maintain a register of interests, gifts and hospitality
- Ensure that appropriate training and updated programmes are implemented across the company
- Monitor breaches particularly where disciplinary action is taken, to identify trends and ensure that any disproportionate impact on any particular group is highlighted and addressed.

3 CODE OF CONDUCT

Corruption

Employees must be aware that it is a serious criminal offence for them to corruptly receive or give any gift, loan, fee, reward or advantage for doing, or not doing, anything or showing favour, or disfavour, to any person in their official capacity.

Private purchasing

Under no circumstances should Owl Live ordering be used for personal advantage or purchases, and no member of staff should receive any discount or advantage as a result of their employment with Owl Live (other than those Corporate Staff discount schemes/Voluntary Benefits which have been agreed for all staff for example for using local leisure facilities).

Equality

Employees should always remember their responsibilities to their clients and ensure courteous, efficient and impartial service delivery to all groups and individuals. Within the workplace there should be mutual respect and employee's language and behaviour should be conducive to a productive and harmonious work environment with all employees having the right to be treated with fairness, dignity and respect.



Employees must comply with policies relating to equality issues as agreed by Owl Live, in addition to the requirements of the law.

Political neutrality

In discharging their duties employees must follow every lawful policy of Owl Live and must not allow their own personal views or political opinions to interfere with their work.

Copyright

All records, documents and other papers which relate to Owl Live's business and which are made or obtained by employees in the course of employment are the property of Owl Live or in such circumstances the client or supplier. The copyright on all such original records, documents, papers (including copies and summaries thereof) belongs to Owl Live or in such circumstances the client or supplier.

Patents and inventions

Any matter or thing capable of being patented under the Patents Act 1977, made, developed or discovered by an employee either alone or with others whilst in the performance of their duties should be disclosed to the company through the appropriate manager and, subject to the provisions of the Patents Act, it will belong to and be the absolute property of Owl Live.

Contact with the media

No member of staff shall disclose to the public or media the contents of confidential information unless required by law or expressly authorised. Employees should not make statements on matters of policy to the media without consulting a member of the Senior Management Team.

Confidential information

Employees will receive from time to time written, oral and computerised data which is of a confidential nature.

Employees must be aware of which information in Owl Live's possession is classed as confidential and which is not and act accordingly. Please refer to the classification matrix as to what level of security classification information should fall under.

Financial dealings/prejudicial interests

Employees must declare in writing to their appropriate manager, any financial interest or dealings they or any person living with them, any close member of their family, close friend or business associate may have in any business or contract which may have a business relationship with Owl Live. Should any employee wish to become involved in any such business they must first receive the permission of a member of the Senior Management Team.

Confidential reporting procedure (whistle blowing)

Owl Live is committed to the highest possible standards of openness, probity and accountability, and expects employees who become aware of activities which they believe are illegal, improper, unethical or otherwise inconsistent with the code of conduct



to report the matter, acting in accordance with the employee's rights under the Public Interest Disclosure Act 1998. Please refer to the whistle blowing policy for full details.

Health and Safety

The Health and Safety at Work Act 1974 places a duty on employees, whilst they are at work, to take reasonable care for the health and safety of themselves and others. Consequently employees are legally bound to comply with all safety rules and instructions set by Owl Live. Please refer to the health and safety policy for full details.

Timekeeping

Employees must comply with the Owl Live's rules regarding attendance and absence.

Other employment

Employees must not allow their private interests to come into conflict with their work. Employees shall devote their whole time service to the work of Owl Live and may not engage in any other business or take up any other additional employment without the written permission of a member of the Senior Management Team. This does not preclude employees from undertaking additional work outside their working hours providing that it does not impact on, distract them from or conflict with their work and is subject at all times to the written permission being granted. Regardless of the scale of the post, all employees who undertake additional work (either paid or voluntary) must notify their line manager in order to comply with the Working Time Regulations 1998.

Information security – disclosure of information

Employees should positively prevent information misuse and assure the accuracy of information by:

- protecting information against unauthorised access
- assuring the confidentiality of stored information
- maintaining the integrity of information
- meeting all regulatory, legislative and company policy requirements
- preventing improper use of office equipment
- limiting the use of electronic mail and internet for authorised business purposes only

For full details please refer to the information security policy.

Alcohol, drugs and other substance misuse

Owl Live wishes to promote the health and well-being of employees and minimise problems at work arising from the effects of alcohol, drugs (whether prescribed or illegal), solvents, etc. The Employment Handbook contains an Alcohol and Drugs/Substance Misuse Policy which you are encouraged to read.

Employees are encouraged to seek help and discuss further with a member of the Senior Management Team as soon as they believe they have a problem. Any such help or onward referral will be handled confidentially.

Employees whose performance or behaviour falls below the acceptable standard or who cause danger or inconvenience as a result of alcohol, drugs or other substance misuse may be the subject of Owl Live's.



Disciplinary and Capability Procedure

Employees taking prescribed drugs are required to advise their manager if any such drugs being taken are likely to have an effect on their ability to drive, to use equipment, etc. as required by their employment with Owl Live.

Appointment of staff and other employment matters

Employees involved in the recruitment and appointment of staff should ensure that these are made on the basis of merit. Employees must not be involved in decisions relating to appointment, promotion, pay, discipline or grievance where the person is a relative, partner or personal friend. Should such a situation arise they must advise the HR Manager.

Conduct and performance

Standards of conduct and performance are determined by senior management. The Disciplinary and Capability Procedure gives a list which is neither exclusive nor exhaustive, of examples of offences which are normally regarded as gross misconduct:

These may include:

- theft, fraud, deliberate falsification of records
- physical violence
- deliberate damage to company property
- being under the influence of alcohol or illegal drugs
- serious negligence
- serious act of insubordination
- misuse of the company's facilities including unauthorised use of computer and communications systems
- conduct which is likely to discredit or be prejudicial to the interests of Owl Live
- serious breaches of health and safety provisions
- age, disability, ethnic or national origins race or colour, religious or political beliefs, gender, gender reassignment, sexuality or any other form of harassment
- serious breach of confidence (subject to the Public Interest (Disclosure) Act 1998)
- wilful insubordination
- acceptance of bribes or any other corrupt or dishonest practice

Personal appearance

Owl Live expects employees to observe a standard of personal appearance, which is appropriate to the nature of the work undertaken, follows operational requirements and which portrays a professional approach which the company's clients, suppliers and other associated parties will have confidence in. Employees are expected to observe a high standard of cleanliness and personal hygiene.

Use of company property and facilities

All Owl Live assets and facilities, including stationery, tools, office telephones, mobile phones, personal computers laptops, machinery, photocopiers, vehicles, offices, car parks may only be used for official company business and not for personal use unless permission for their private use is obtained from the appropriate manager.



Hospitality and Gifts

Owl Live will not tolerate bribery or corruption in any form.

The company prohibits the offering, giving, solicitation or the acceptance of any bribe or corrupt inducement, whether in cash or in any other form:

- To or from any person or company wherever located, whether a public official or public body, or a private person or company;
- By any individual employee, director, agent, consultant, contractor or other person or body acting on the company's behalf;
- In order to gain any commercial, contractual, or regulatory advantage for the company in any way which is unethical or to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

Please refer to the bribery policy for full details.

4 CHANGE HISTORY RECORD

| Issue | Description of Change | Author | Approval | Date of Issue |
|-------|-----------------------|-------------------|------------------|---------------|
| 1 | Initial issue | Holly Roberts | Antony Greenberg | 12.01.2020 |
| 2 | Change of format | Rachael McDougall | Nicola Neal | 16.08.2021 |
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