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Code of Conduct

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1 Introduction

This Code of Conduct (**Code**) outlines Smulders Projects UK's, hereinafter referred to as the Company, expectations regarding acceptable behaviours towards other workers including supervisors and the Company as a whole. Regardless of employment status, we expect all workers providing a service to the Company to do the right thing and take appropriate channels to challenge where others don't.

The Code does not cover every possible situation. We are all required to use our best judgment in applying the principles of the Code and to demonstrate its spirit in everything that we do.

The Company encourages open communication and expects that all workers foster a respectful and collaborative environment. This is reflected in the Company's values of:

- Respect
- Customer Orientation
- Teamwork
- Decisiveness

2 Scope

The Code covers the Company's Newcastle (Wallsend) facility and applies to all workers including employees, agency workers, contractors and those working on behalf of subcontractors on site, referred to as workers in this Code. The Code not only applies during business hours, it also extends beyond the hours of business. The Company does not seek to dictate how workers conduct themselves outside of work, however, unlawful or anti-social behaviour that falls below the required standard and may jeopardise the Company's reputation could result in formal action being taken.

For those workers who are employed directly by the Company any breach of this Code, or part thereof, including the rules, policies and procedures that are to be read in conjunction with this Code may result in formal action, which shall include disciplinary sanctions or, for a more serious offence, it could lead to dismissal, with or without notice.

For those workers who are engaged through a recruitment agency or limited company contractor, or a subcontractor or supplier the Company will liaise with the relevant agency or subcontracting company in the event of any breach of this Code, or part thereof, including the rules, policies and procedures that are to be read in conjunction with this Code. A decision will then be reached on the action to be taken, which may be terminate the assignment or contract under which you are engaged, and there may be the potential you will be refused future work opportunities with the Company, depending on the severity of the breach.

3 Equality, Diversity and Inclusion

The Company seeks to ensure that the working environment for all workers is supportive, free from prejudice and discrimination and one where individual respect is shown to all. All workers regardless of age, disability, sex, race, religion, gender reassignment, marriage or civil partnership, pregnancy or maternity, sexual orientation or any other factor will be supported and encouraged to perform to their full potential. The Company encourages all workers to be friendly and collaborative and they should not behave in such a manner as to disrupt the workplace or put obstacles in the way of others when performing their duties.

4 Violence / Harassment / Sexual Harassment at the Work Place

The Company is committed to ensuring that everyone can work and participate in work activities without fear of harassment, bullying or intimidation. Everyone has a part to play in ensuring that their behaviour, whether intentional or otherwise, does not constitute bullying and/or harassment. The Company will take the necessary action required in dealing with workers whose behaviour is inappropriate and shows a lack of respect for others and leads to people feeling threatened. See **Procedure P-HRA-SPU-005 Anti-Harassment and Bullying Policy**

5 Health & Safety Policy Statement

Health and safety is the one of the Company's top priorities. Positive action is taken to ensure a safe working environment where risk is minimised/eradicated as required by the Health and Safety at Work Act 1974 and other associated legislation.

All activities should be carried out with the highest regard for all on-site workers including clients and customers and for visitors, local residents and the environment.

We aim to continually improve and, in doing so, we learn from situations that arise and regularly review our risk assessments so as to remove/reduce the risk of accidents and incidents and potential causes of ill health. See **Health and Safety Policy Statement R-SM-SPU-001** for further information.

6 Dress Code

The Company does not operate a formal dress code, other than for those who are provided with personal protective clothing and equipment (**PPE**); such PPE should be worn as directed by the Health and Safety Manager and as communicated at induction. You are responsible for the care and safe keeping of all PPE issued to you and you will be required to sign for all PPE. Failure to wear PPE as required increases the risk of accidents/illness which will not be tolerated.

All workers must ensure they are dressed appropriately for the situation in which they work and in doing so they present a professional image to colleagues and visitors alike.

7 Punctuality / Attendance

All workers should arrive and allow sufficient time to change into PPE where required before the start of their shift and not leave until their shift has ended, unless they have prior approval from their supervisor. The Company operates a time and attendance system that records start and finish times when the ID badge has been scanned. It is very important that you observe the **Clocking In and Out Procedure P-HRA-SPU-003**. Any issues with ID badges should be reported to HR as soon as possible.

All workers are expected to perform their contracted hours each week. Where a holiday from work is required, the holiday must be requested in line with the **Holiday Request Procedure P-HRA-SPU-002**. Where any other type of leave is required by a worker, this should go via the agency or their line manager who should then contact the HR Manager who will advise on the most appropriate type of leave to suit the circumstances and the process that should be followed. See **Holiday Request Procedure P-HRA-SPU-002**

Where an individual is sick and unable to come to work, they should ensure they follow the **Absence Reporting Procedure P-HRA-SPU-004**

8 Performance

The Company expects all workers to follow reasonable rules and management instructions that are given to them by their supervisor or line manager and, in doing so, they should complete their duties with skill and in a timely manner. When supervisors delegate duties to their team members, they should take account of their level of competence and workload. Supervisors must not abuse their authority and should not abdicate responsibility, but they should support individuals to maximise their potential.

Where an individual's performance continually falls below the required standards or where an individual's performance shows a notable deterioration or if they are not fulfilling the requirements of their position in a reasonable time frame, supervisors should contact the HR Manager for advice.

9 Misuse of Alcohol and Drugs

The Company does not permit workers to perform their duties or remain on site when under the influence of alcohol or drugs; this also refers to prescription drugs where they are likely to have a bearing on an individual's safety and/or ability to carry out their normal duties. To help mitigate such risk, the Company operates random alcohol and drug testing and reserves the right to perform 'with cause' testing where there

is reasonable suspicion that an individual is under the influence of alcohol or drugs and they are unable to perform routine tasks. See section 7 of the **Alcohol and Drug Policy P-HSM-SPU-040** for more information.

10 Conflicts of Interest/ Bribery/ Gifts and Hospitality

The Company expects a standard of behaviour that is above reproach, particularly where workers are in decision making positions and their decisions have a significant impact on others, both internal and external to the Company.

It is important that decisions are made in a fair and balanced way and they can withstand scrutiny. Conflicts of interest should be identified and brought to the attention of a supervisor/manager as soon as possible to avoid decisions being made that could be seen to be biased.

The Bribery Act 2010 describes a bribe as a financial or other advantage that is offered, promised or given to induce a person to perform a relevant function or activity improperly or to reward them for doing so. Under the Act, individuals can be prosecuted for accepting bribes or offering bribes and likewise a Company can be prosecuted for failing to prevent bribery. While the Act is designed to punish bribery, genuine acts of hospitality could be construed as bribes. In order to minimise the risk, all workers are asked to send written notification to the Company Director when they receive a gift. On occasion the Company Director might ask that you hand the gift in so it can be raffled off at year end with any other such gifts so all workers have the opportunity to benefit.

11 Smoking

The Company is committed to protecting the health, safety and welfare of all those who work for it by providing a safe place of work and protecting all workers, service users, customers and visitors from exposure to smoke.

All of the Company's work areas (including vehicles) are smoke-free in accordance with the Health Act 2006 and associated regulations. All staff and visitors have the right to a smoke-free environment. This policy covers all employees, officers, consultants, contractors, casual workers and agency workers. Anyone visiting the premises or using its vehicles must comply with the smoking restrictions set out in the Company's policy. Any individual wishing to smoke must only smoke in the designated smoking areas provided, and should do so at break times only. When smoking outside, you must dispose of cigarette butts and other litter appropriately.

Smoking is not permitted except within the designated smoking areas as provided by the Company, as described above.. This ban applies to anything that can be smoked and includes, but is not limited to, cigarettes, electronic cigarettes, vape pens, pipes (including water pipes such as shisha and hookah pipes), cigars and herbal cigarettes.

Anyone using the Company's vehicles, whether as a driver or passenger, must ensure the vehicles remain smoke-free. Any of the Company's vehicles that are used primarily for private purposes are excluded from the smoking ban.

Smoking in smoke-free premises or vehicles is also a criminal offence and may result in a fixed penalty fine and/or prosecution. See Smulders' **Smoking Policy P-HSM-SPU-001** for further details.

12 Mobile Phone / Smart Device Use

Given the nature of the workplace environment, mobile phones and other communication devices that are not approved for work-related use may only be used on the yard by supervisors for business purposes only. Workers are not permitted to use their mobile phones whilst on the yard and no pictures are allowed to be taken on site, for any reason, without express permission from the Director of the Company.

In extenuating circumstances where a production (yard based) worker may have to respond to an important call/message for example regarding the well-being of a family member; they must first notify the supervisor that they may expect such a call. The supervisor may give permission to the worker to keep their mobile phone on them (on silent/vibrate only) and, should they need to respond to a call/message, they should go

to a safe area before doing so. Other than that, the use of mobile phones is only permitted in the canteen area during break times.

Likewise, office based workers should notify their supervisor that they may have to respond to an important call/message regarding the well-being of a family member and should respond to such a call/message in a suitable area of the office; otherwise, the use of personal mobile phones is only permitted during break times. See the **Mobile Phone Policy P-HSM-SPU-002** for further details.

13 Social Media

The **Social Media Policy P-HSM-SPU-003** regulates the conduct of both the use of social media in the workplace and beyond. Workers should be aware that any information that they may share, including statements or views on social media during their private time may adversely affect the Company or the Smulders Group.

Office based workers are permitted to use social media during working hours, provided that such usage is work related and adheres to this policy. Yard based workers are permitted to use social media during any breaks (e.g. coffee / lunch break) provided this usage adheres to this policy. If social media is being accessed via a mobile phone or other smart device, please refer to section 11 of this Code on Mobile Phone / Smart Device Use.

The Company reserves the right to monitor the use of social media by workers affiliated with the Company or the Smulders Group.

14 Protection of Company Property

All workers must treat Company property (regardless of whether it is material or intangible) with respect and care. Company property should not be mis-used or used frivolously and should be used for its intended purpose only.

All workers should protect company facilities and other material property from damage and vandalism and should notify their manager where any damage, misuse or vandalism has occurred.

15 CCTV

The Company operates a closed-circuit television (CCTV) system which records images to protect the Company's property and to provide a safe and secure environment for staff, temporary workers, subcontractors, suppliers and for visitors to the Company's business premises, such as clients and customers.

The system is operated fairly and lawfully and only used for the purposes for which it is intended and operations give due regard to the privacy of all individuals. Any changes to the purposes for which the CCTV is operated requires pre-approval from the Company Director. See Smulders' **CCTV Policy P-HRM-SPU-001** for further details.

16 Data Protection / Retention / Information Security

The Company recognises that information and the associated processes, systems and networks are valuable assets and the management of personal data has important implications for individuals. The Company will facilitate the secure flow of information both inside the organisation and with relevant third-party data processors who are relied upon to provide a service to the Company. When handling, processing and storing both personal and sensitive information, the Company will observe the principles as set out in:

Retention Policy P-HRM-SPU-002
Data Protection Policy P-HRM-SPU-003
Privacy Notice D-HRM-SPU-003

17 Raising Concerns

All workers have a duty to raise concerns where they identify breaches of this Code, this should be in confidence and normally through their Supervisor however if it is inappropriate for the Supervisor to be the first point of contact under the circumstances, the HR Manager should be contacted – +44 (0)191 2956728. No individual who expresses a concern in good faith and in line with this guidance shall be penalised for doing so.

18 Breaches of the Code

This Code has been drawn up to provide a source of guidance to workers providing a service to the Company. The document can be amended at any time and whilst the Company will do their utmost to ensure that relevant parties are informed of any changes, it is the individual's responsibility to ensure they have the most up to date guidance.

All workers must comply with the provisions of this Code and its associated policies. Any breaches will be taken seriously and may result in formal action being taken, the form of which will depend on the worker's employment status, as set out in section 2 on scope of this Code.

19 Other Documents

Other documents to be read in conjunction:

D-HRM-SPU-003	Smulders Newcastle Privacy Notice;
P-HRA-SPU-002	Holiday Request Procedure;
P-HRA-SPU-003	Clocking in Out Procedure;
P-HRA-SPU-004	Absence Reporting Procedure;
P-HRA-SPU-005	Anti-Harassment and Bullying policy
P-HRM-SPU-001	CCTV Policy;
P-HRM-SPU-002	Retention Policy;
P-HRM-SPU-003	Data Protection Policy;
P-HSM-SPU-001	Yard Agreement;
P-HSM-SPU-002	Mobile Phone Policy;
P-HSM-SPU-003	Social Media Policy – Newcastle yard
P-HSM-SPU-040	Hadrian Yard – Alcohol and Drug Policy;
R-HSM-SPU-001	Smoking Policy;
R-SM-SPU-001	HSE Policy Statement