



Kagool's Code of Business Conduct

1st Edition

January 2023

Version 1



Five Principles of Compliance

1. TRUST

To build trust of society we must always follow the policies

2. CHECK

Check or ask if you are uncertain, lack of awareness is not an excuse of not following policies and procedures.

3. REPORT

Never cover up or disregard any wrongdoings or mistakes that violate policies and procedures.

4. CORRECT

Promptly correct any wrongdoings or mistakes and take effective measure to prevent recurrences.

5. NON-RETALIATION

Never obstruct anyone from reporting or using the whistleblowing policy; never retaliate against the reporter/whistleblower for reporting a concern in good faith.

The Organisation's code of conduct sets out the standards of behaviour the Organisation expects from all employees. Rules in relation to the conduct of all employees are set out in this Code of Conduct and there are examples of what the Organisation considers to be gross misconduct which could result in summary termination of employment.

Kagool Employees (All who work for Kagool Ltd, from top management to each and every employee, including contract employees, and temporary employees and others) **should fully understand its responsibilities as a good corporate citizen, and duly respect and comply with all the rules.**



Employee behaviour

The following general standards are required by all Organisation employees:

- employees should behave in a respectful, professional and polite manner and ensure their behaviour does not breach the Equality Act 2010
- employees should comply with all reasonable management instructions
- employees should cooperate fully with colleagues and management
- employees should always uphold and further the Organisation's positive public image
- satisfactory standards of performance should be maintained at all times
- the Organisation's policies and procedures should be adhered to at all times.

Equality, diversity and inclusion

An important core value of the Organisation is the promotion of inclusivity and diversity. It seeks 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, (dis)ability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, ethnic background, culture, sexual orientation, religion or belief, sex or any other factor. All staff 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 Organisation 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 *Harassment and bullying* policy.

Gross misconduct

The following offences are examples of gross misconduct:

- Bullying or physical violence
- Fraud, theft, or any act of dishonesty



- Altering records, such as sales records, to put yourself in a better light even if there is no immediate financial benefit to you.
- Malicious misuse of any of our procedures, for example if you make up allegations when taking out a grievance against someone.
- Serious negligence or carelessness, particularly if it leads to us losing trust and confidence in you.
- Serious health and safety breaches
- Serious breach of data protection legislation or our data protection policy
- Serious and intentional damage to Company property
- Unlawful harassment or discrimination
- Viewing, receiving, or sending anything that breaches our Harassment and Bullying Policy or Equal Opportunities Policy
- Knowingly accessing websites containing offensive, obscene, or pornographic material
- Misuse of internal email, external email or other internet and computer-based facilities including the storage and/or transmission of obscene, illicit, or undesirable material.
- Serious insubordination or refusal to obey management instructions.
- Serious breaches of confidence.
- Covertly recording you colleagues, or any management (or other) meeting where the participants do not know you are recording it
- Being under the influence of, or possessing, illegal drugs
- Being under the influence of alcohol, unless this is with your manager's express knowledge and permission—for example, where you are involved in entertaining on the Company's behalf.
- Conduct that violates common decency or engaging in behaviour that might bring the Company's name into disrepute.

Conduct outside work.

As a general rule, what employees do after working hours and away from the premises is a personal matter. However, the Organisation will become involved in the following circumstances.

- At office parties, drinks events and other work-related social occasions.
- At third-party (that is, clients and customers) occasions where the employee has been invited in their capacity as an employee and representative of the Organisation.



- At work-related conferences and training courses.

Where the employee is away on business on behalf of the Organisation.

The Organisation's policies will continue to apply at all these events. An employee should not bring the Organisation's name into disrepute. Improper behaviour will lead to investigation and possible disciplinary action, including dismissal and in cases of gross misconduct, a summary dismissal.

For further information, employers should refer to the Organisation's Grievance and Disciplinary procedures.

Relationships with other members of staff and clients and customers

The Organisation does not concern itself with the private lives of its staff unless they affect its effective operation or its reputation.

Members of staff who are relatives or who have a close personal relationship should not normally have a supervisory, assessing or authorising relationship with each other.

Employees must inform their line manager if they have a close personal relationship with another employee or a client or customer which could be considered by colleagues or other, as impacting on the way they conduct themselves at work.

Criminal offences

For the avoidance of doubt, an employee must inform their manager in writing if they are under investigation for a criminal act (including road traffic offences) or have been arrested in connection with a criminal action. They must also inform their manager in writing if they have been found guilty and convicted of any offence or received a police caution. Failure to disclose this information may be treated as a disciplinary offence.

Furthermore, if an employee commits a criminal offence outside employment, the Organisation will investigate the matter to ascertain whether there is any connection between the offence and the individual's employment. If there is an adverse finding in this respect, this could result in the employee's dismissal under the disciplinary procedure.

Attendance and timekeeping

Employees will not be paid if any working time is lost due to lateness or unauthorised absence. Persistent lateness will be dealt with under the Organisation's disciplinary policy.

The following rules are required of employee's:

- Employees should comply with the Organisation's hybrid WFH advice



- Employees should be present and ready to start work in line with their contractual working hours. They must also remain in the workplace and continue to work until they have completed their contractual working hours
- employees should ensure they notify their line manager in accordance with the Organisation's absence procedure if they are going to be absent from work
- employees should liaise with their line manager if they wish to leave early or arrive late.

Tapping in and out

We operate a tap in/tap out policy with which all employees are expected to comply. Upon arrival to work, you must tap in at the entry point you entered the premises with. Upon leaving the premises you must ensure that you personally tap out using any exit doors. It is not permissible under any circumstances for any employee to tap in/tap out on behalf of another. Failure to adhere to this procedure may result in summary dismissal and/or incorrect or delayed payment of wages.

Communications

During working hours, employees should use phones only when necessary for work use or personal calls and texts. Discretion should be exercised when using a personal mobile device and any use must not cause a distraction from work for the employee themselves or their colleagues. Using social media such as Instagram, TikTok, Facebook, Twitter during working hours is not accepted.

Only certain job roles require the provision of an Organisation mobile phone. Where provided, they are for business use only.

Email and internet use

The Organisation will not tolerate the use of email and internet for unofficial or inappropriate purposes, including:

- any messages that could constitute bullying, harassment or other detriment.
- accessing social networking sites such as Facebook using Organisation equipment or during work time
- on-line gambling
- accessing or transmitting pornography
- accessing other offensive, obscene or otherwise unacceptable material
- transmitting copyright information and/or any software available to the user
- posting confidential information about other employees, the Organisation or its customers or suppliers.



Although our email facilities are provided for the purposes of our business, we accept that you may occasionally want to use them for your own personal purposes.

Employees' work email addresses should not be used to send personal emails. Employees may access their personal email accounts during break times.

Social media

Social media usage for work purposes is controlled by *the Marketing Team*. Approval will be granted by the Social Media Manager where this is required for an employee's job role.

Social media usage for personal reasons does not need approval by the Organisation.

When using social media, either in a personal or work capacity, during or outside working hours, employees must adhere to the following guidelines.

Posts on social media must not:

- compromise the Organisation, disclose confidential data or disclose sensitive data
- damage the Organisation's reputation or brand
- breach laws on copyright or data protection
- contain content that is of a libellous or defamatory nature
- engage in bullying or harassment
- be of illegal, inappropriate or offensive content
- interfere with your work commitments
- use the Organisation's name or reputation to promote any other product or any political opinions.



Representing the Organisation

The Organisation recognises the importance of work life balance. Whilst we do not intent to restrict outside activities, it is important to remember that activities whether during or outside of working hours which result in adverse publicity to the Organisation, or which cause us to lose faith in your integrity, may give us grounds for your dismissal.

When attending any work-related social function an appropriate standard of conduct is expected from all employees. This includes but is not limited to any Christmas lunch, nights out, dinners or other social events with suppliers, customers, etc.

Work-related social functions can be a great opportunity to celebrate and get to know your colleagues better. However, it is important to remember that our policies on anti-harassment and bullying, personal harassment, disciplinary and equal opportunities apply fully at these events.

Fraternisation

Whilst you are encouraged to be friendly towards our clients/customers it is important that employees do not cross the professional boundaries. Employees should maintain professionalism at all times and under no circumstances should become overfamiliar or fraternise with clients/customers in a way that may be seen to disrupt the operations or reputation of the business.

Employees who are found to have acted unprofessionally or inappropriately may be liable for disciplinary action in line with Organisation procedures.

Alcohol and drugs

Use of drugs and alcohol during working hours is not permitted. If an employee is suspected of use during working hours, the employee may be subject to disciplinary action under the Organisation's disciplinary policy.

Employees must not be under the influence of drugs or alcohol during working hours and must not support or influence others to use alcohol or drugs. Employees suspected of using or dealing drugs in the workplace will be reported to the police.

Health and safety

Any accidents, however minor they may appear, should be recorded in the Organisation's accident book (contact HR) as soon as possible.



Employees are responsible for ensuring they are familiar with the Organisation's health and safety policies and procedures, including the consequences of breaching these.

If employees are attending the premises of a third party or service user, they are required to familiarise themselves with the applicable policies and procedures.

Employees should ensure they handle any hazardous materials with care.

Breaching any rules surrounding health and safety may lead to disciplinary action. A breach may be considered gross misconduct which can result in summary termination of employment.

Smoking

In accordance with the Health Act 2006, the Organisation does not permit smoking in the workplace, either on Organisation premises or in Organisation cars. The Organisation promotes a working environment which is smoke-free, pleasant and healthy. This prohibition extends to the use of e-cigarettes or similar devices.

Bribery

Bribery is, in the conduct of the Organisation's business, the offering or accepting of any gift, loan, payment, reward or advantage for personal gain as an encouragement to do something which is dishonest, illegal or a breach of trust. Bribery is a criminal offence. No gift should be given nor hospitality offered by employees to any party in connection with the Organisation's business without receiving prior written approval from the employee's line manager.

Employees will face disciplinary action if it is discovered that they have accepted, offered or given any bribe, which could include dismissal for gross misconduct. Accepting a bribe also carries separate criminal liabilities for the employee personally and for the Organisation.

The Organisation's anti-bribery policy contains more information on this area.

Flexibility

The Organisation may request, from time to time, that employees work extra hours at short notice, subject to the needs of the business.

Employees may also be requested to perform work which is additional to their usual duties and/or to carry out their role at a workplace other than their usual location of work.



These requests will be made to employees as the need arises through the employee's line manager.

Confidentiality

All information gained during the course of your employment is considered confidential, for the duration of your employment and post-employment. Employees are expected to keep this information confidential, unless required by law not to do so.

Competing with the Organisation

Employees who undertake external activities that place them, or could place them, in competition with the Organisation may be subject to disciplinary action.

If an employee wishes to undertake other employment while employed by the Organisation, permission is required from the employee's practice lead and your HR Team.

Clothing

As employees are liable to come into contact with customers and members of the public, it is important that you present a professional image with regard to appearance and standards of dress.

Employees are expected to be in either Business Formal, Business Professional or Business Casual dress codes when present in the office. The employee should be dressed professionally when meeting clients and customers.

Identification cards

ID cards show your name, the name of the Organisation and a recent photograph.

ID cards must be worn at all times in the workplace. When visiting *clients/customers/external sites/service users* you must ensure your ID card is worn and is visible at all times.

Property and equipment

Employees who cause any damage to Organisation property through misuse, recklessness or carelessness may be required to repay to the Organisation the cost of repair or replacement. The Organisation reserves the right to recover this cost by way of a deduction from your next salary payment.



When an employee's employment is terminated, employees should return all Organisation property, including IT equipment, stationery, Organisation mobile phone or tablet, Organisation car and any other items belonging to the Organisation.

Searches

The Organisation may require searches to be conducted of employees, by authorised persons. The Organisation may reasonably request to search employee's person, clothing, bags, lockers or vehicles.

The Organisation's authorised person will conduct the search, with an independent witness also in attendance. If an employee refuses to permit such a search, the appropriate authorities may be contacted to carry out the search for the Organisation.

Failure to permit to a search may lead to disciplinary action. A refusal may be considered gross misconduct which can result in summary termination of employment.

Personal property

The Organisation is not responsible for the loss, theft or damage to any personal property brought by employees on to Organisation premises or stored in Organisation vehicles. Employees are responsible for the security and safety of their personal possessions at all times. Employees should keep these items safe in their lockable desk drawers/lockers.

Lost property should be handed to an employee's line manager if found.

Environment

The Organisation aims to keep use of consumables to a minimum by promoting the effective and efficient usage of equipment, facilities, supplies and services.

Employees should make every effort to reduce wastage, turn off excessive lights or heating/cooling equipment, use water resources appropriately and switch off any electronic equipment which is not in use.

Human Rights

1. We do not employ anyone under the age of 15 at our workplaces.
2. We do not use forced labour in any form. We do not confiscate personal documents of Kagool workforce or force them to make any payment to us or to anyone else to secure employment with us or to work with us.

**Handling money**

Employees that have been authorised to handle monetary transactions on behalf of the Organisation are responsible for those transactions they carry out.

Employees who purchase products for a service user must ensure that receipts are kept and items are logged in the service user's records.

Employees are prohibited from taking money from, or giving money to, service users regardless of what form this transaction takes. Employees are also not allowed to use a service user's store loyalty card for their own personal gain and may not use their own store loyalty card when making a purchase of goods for service users.

Breaches

Breaches of the Organisation's code of conduct are likely to be regarded as an act of misconduct to be addressed under the Organisation's disciplinary procedure. Some of the above sections indicate the level of offence that could occur if breaches are found.