

**Northern Gas and Power Ltd  
Code of Conduct Procedure & Policy  
October 2019**

**1. Introduction**

This policy outlines the Code of Conduct Procedure & Policy or Northern Gas and Power Ltd (“The Company”).

The Company requires its employees to observe its rules and standards in respect of attendance, work performance, conduct and health and safety, including the Code of Conduct and Procedure and Policy.

**2. Purpose and Scope of Policy**

This policy applies to all employees of the Company.

All employees are expected to contribute to the Company’s culture of compliance by understanding all Company policies, embracing the Company’s commitment to integrity and acting to enforce compliance and avoid any breaches of policy. You should understand our policies and raise any concerns you may have.

The policy aims to promote consistency and fairness within the Company in regards to the treatment of employees.

**3. Company Employment Standards**

The standards set out below are not an exhaustive list, but examples of what is generally required. Failure to achieve or maintain the Company’s standards may result in advice, warnings, penalties or even dismissal:

- Comply with the all company policies and procedures.
- Regularly attend work, and display punctual time keeping including breaks, etc.
- Accurately record information and/or Company and business-related documents
- Not breach Company confidentiality and disclose Company documents and/or statistics to a third party, unless otherwise authorised
- Safeguard Company property; use same only on Company business and treat it with due care
- Maintain safe working conditions, ensuring safety of yourself and that of others
- Not use notice boards for the display and/or distribution of literature unless authorised
- Not display disorderly conduct of any kind
- Not gamble during working hours including online methods
- Not consume alcohol or non-prescribed drugs during working hours
- Avoid situations which may create a conflict of interest or appear to cause a conflict of interest
- Maintain reasonable standards of personal attire and hygiene.

**4. Company Customer Standards**

The Company understand the importance of customer satisfaction and trust and that these are cornerstones of lasting relationships; as such we are committed to providing the best possible advice, service and account management for all our customers at all times.

All colleagues are expected to behave in a professional manner at all times and ensure where possible that they provide honest, open, accurate and relevant information and advice to customers.

We have strict compliance rules and robust processes in place to ensure all sales are accurate and conducted in the correct manner.

Below are expectations that outline the basic requirements on employees when dealing with customers or making a sale:

- All employees should behave in a professional manner at all times and not bring the business into disrepute.
- All employees should follow compliance rules at all times when dealing with customers.
- All employees should be open and honest with customers at all times.
- All employees should provide accurate and relevant information to customers at all times.
- All employees should strive to ensure customer satisfaction at all times.
- All employees should work with customers to find the best fit solution for the customer at all times.
- All employees should ensure they are clear about services offered, contract details and charges and that their customer fully understands these.

The above list is not extensive or exhaustive and is for example only.

Any complaints received should be dealt with by the Complaints Department who will acknowledge the issue, investigate the issue and then wherever possible aim to provide the customer with clear and concise full details of the issue and any resolution available within 10 working days of receiving the official complaint notification via [complaints@ngpltd.co.uk](mailto:complaints@ngpltd.co.uk)

## **5. Examples of Unacceptable Conduct**

The following are examples of unacceptable conduct which may be dealt with under any stage of the Company's Disciplinary Procedure, as judged to be appropriate by management and may result in dismissal.

This is not an exhaustive list:

- Non-compliance with any Company Policy or Procedure
- Persistent lateness
- Frequent / persistent short-term absence
- Failure to maintain work performance standards
- Behaviour which is unacceptable and likely to bring the name of the Company into disrepute
- Unauthorised use of Company property
- Insulting behaviour including any during work related social event
- Smoking in unauthorised areas of the Company premises
- Consumption of alcohol or non-prescribed drugs during working hours (including breaks) on or off Company premises
- Acceptance of gifts or other benefits from those with whom the Company does business, except those of a token gesture and insignificant in value
- Any other misconduct judged by the Company to be of similar gravity to that above

## 6. Examples of Gross Misconduct

The following are examples of gross misconduct where a breach of the Company rules and standards could lead to summary dismissal, without warning or notice or compensation in lieu of notice and without making any further payment beyond the amount of remuneration actually accrued to the date of termination.

The list is not exhaustive.

- A criminal offence with which an employee is charged or any other incident, which in the opinion of management, renders the individual unsuitable to carry out their duties
- Theft, fraud or any form of dishonesty (including attempts and action calculated to assist others in such activity)
- Deliberate damage to property of the Company, a client or another individual
- Assault on another individual
- Harassment, or bullying, including sexual, racial, disability, religion or religious belief, sexual orientation or age or any other form of harassment or indecency
- Being incapable of work through the influence of alcohol
- Possession and/or use of illegal substances
- Unauthorised Absence, Absence without authorised leave (AWOL)
- Serious negligence which may result in injury, damage or loss
- Unauthorised disclosure of information confidential to the Company
- Unauthorised use of Company communication facilities
- Giving deliberately misleading or incorrect information prior to your employment or on joining the Company
- Refusal to carry out a reasonable request given by a person authorised to give such instructions
- Accessing personal data of other employees without authority
- Failure to adhere to company rules when using social networking sites eg Facebook and Twitter
- Any breach of Health & Safety Policy
- Any breach of Company Information Security Policy
- Any other misconduct judged by the Company to be of similar gravity to the examples quoted above

## 7. Gifts and Hospitality

In general, the Company does not believe that it is appropriate for employees to accept gifts or hospitality from customers, suppliers or any other person or organisation with which the Company has (or might have) business connections. This is because it is important to ensure that no employee acts in any way that is inconsistent with the Company's objectives or with the integrity of the business by accepting a gift in circumstances where it could influence, or be seen to influence, that employee's business actions or decisions.

All employees must familiarise themselves with the Company's Anti-Bribery Policy for full guidance on gifts and hospitality.

## 8. Events

As a token of its appreciation for the work that employees do for the Company, and in order to foster team spirit and good working relationships, the Company aims to offer employees the opportunity to attend social events from time to time. The Company may also run work-related social events to which clients, as well as staff, are invited.

Although such social events usually take place away from the workplace and outside of normal working hours, it is in everyone's interests to impose certain rules of conduct for the protection and comfort of all and therefore the

Company's Code of Conduct and Performance applies to such events. Specifically, employees who attend work-related social events must adhere to the following rules and principles:

- Employees should consume alcohol only in moderation at work-related social events, and /or work events organised by the company irrespective of whether the Company provides or pays for the drinks.
- It is strictly forbidden for any employee to use illegal drugs, including cannabis, at any work-related social event whether on Company premises or not.
- The Company's policy on harassment/ bullying applies to work-related social events.
- Employees should not say or do anything at a work-related social event that could offend, intimidate, embarrass or upset any other person, whether as a joke or not.
  - Swearing and intemperate language are unacceptable at work-related social events.
- Employees must not behave in any way at any work-related social event that could bring the Company's name into ill repute.

Any breach of the above rules will render the employee liable to disciplinary action under the Company's disciplinary procedure, up to and including summary dismissal.

The above rules are in place for the benefit of all members of staff and to ensure that everyone can enjoy work-related social events in an atmosphere of conviviality without fear of being made to feel uncomfortable by another employee's conduct.

Please refer to the Company's policy specific to Work related social events for more information.

## **9. Confidentiality**

All people are required to comply with the General Data Protection Regulations (GDPR) when handling personal and confidential data.

During the course of your work you are likely to have access to information which is private or confidential to the Company or Client. Such information may be held on electronic office equipment or in manual paper files. You must ensure that confidential information is only made available to those who need to know it in carrying out company work and that it is never disclosed to anyone else, whilst you are in employment and after leaving the company's service.

Please refer to your terms and conditions of employment for additional information relating to confidential information.

## **10. Breaches of this Policy**

Anyone found to be in breach of this policy may face disciplinary action which could result in the termination of their employment.

## **11. Policy Review**

This policy will be reviewed regularly.

**This policy has been approved & authorised by:**

**Name:** Scott High



**Position:** Global People Director

**Signature:** 