



**Global Procurement Group Limited
Code of Conduct Policy
v.1.1 March 2021**

Version Control

Date	Ver	Changes	Author(s)
Mar 2021	-	Introduction of version control page	Kelly Convery
Mar 2021	1.1	Updated Introduction. Updated Company Name. Updated clause 3. Updated clause 4. Updated wording in Clause 4.4.4. Updated clause 9. Updated word 'You' to 'Employee'. Updated wording in clause 10 & 11.	David Summerhayes, and Kelly Convery

1. Introduction

This policy outlines the Code of Conduct Procedure & Policy for Global Procurement Group Limited and any of its subsidiaries from time to time (“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. For the purposes of this policy, “Employees” refers to all employees, officers, consultants, contractors, casual workers, and agency workers of the Company.

This policy does not form any part of any Employee’s contract of employment.

For those Employees who are based outside of the UK, should there be any conflict between this policy and a local law, or any location-specific Code of Conduct Policy put in place by the Company (or any subsidiary) from time to time, the local law or location specific policy shall take precedence over this policy.

2. Purpose and Scope of policy

- 2.1 This policy applies to all Employees of the Company.
- 2.2 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, acting to enforce compliance, and avoid any breaches of policy. Employees should raise any concerns they may have with any of the Company’s policies to HR.
- 2.3 The policy aims to promote consistency and fairness within the Company regarding the treatment of Employees.

3. Company Employment Standards

- 3.1 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 render Employees liable to disciplinary action in accordance with the Disciplinary Procedure:
 - 3.1.1 Comply with all Company policies and procedures;
 - 3.1.2 Regularly attend work, and display punctual time keeping including breaks, etc.;
 - 3.1.3 Accurately record information and/or Company and business-related documents;
 - 3.1.4 Not breach Company confidentiality and disclose Company documents and/or statistics to a third party, unless otherwise authorised;
 - 3.1.5 Safeguard Company property; use same only on Company business and treat it with due care;
 - 3.1.6 Maintain safe working conditions, ensuring safety of themselves and that of others;
 - 3.1.7 Not use notice boards for the display and/or distribution of literature unless authorised;
 - 3.1.8 Not display disorderly conduct of any kind;
 - 3.1.9 Not gamble during working hours including online methods;
 - 3.1.10 Not consume alcohol, non-prescribed drugs and/or any form of illegal substances during working hours;
 - 3.1.11 Avoid situations which may create a conflict of interest or appear to cause a conflict of interest; and
 - 3.1.12 Maintain reasonable standards of personal attire and hygiene.



4. Company Customer Standards

- 4.1 The Company understands the importance of customer satisfaction and trust and that these are cornerstones of lasting relationships; as such the Company is committed to providing the best possible advice, service, and account management for all customers at all times.
- 4.2 All Employees 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.
- 4.3 The Company has strict compliance rules and robust processes in place to ensure all sales are accurate and conducted in the correct manner.
- 4.4 Below are expectations that outline the basic requirements on Employees when dealing with customers or making a sale. All Employees should:
 - 4.4.1 behave in a professional manner at all times and not bring the business into disrepute;
 - 4.4.2 follow compliance rules at all times when dealing with customers;
 - 4.4.3 be open and honest with customers at all times;
 - 4.4.4 provide accurate and relevant information to customers at all times including, where requested, details of the remuneration it is proposed the Company will receive on a proposed energy contract, providing the request was made before the contract was signed;
 - 4.4.5 strive to ensure customer satisfaction at all times;
 - 4.4.6 work with customers to find the best fit solution for the customer at all times; and
 - 4.4.7 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.
- 4.5 Failure to achieve or maintain these standards may render Employees liable to disciplinary action in accordance with the Company's Disciplinary Policy and Procedure.
- 4.6 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.

5. Examples of Unacceptable Conduct

- 5.1 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.
- 5.2 This is not an exhaustive list:
 - 5.2.1 Persistent lateness;
 - 5.2.2 Frequent / persistent short-term absence;
 - 5.2.3 Failure to maintain work performance standards;
 - 5.2.4 Behaviour which is unacceptable and likely to bring the name of the Company into disrepute;
 - 5.2.5 Unauthorised use of Company property;



- 5.2.6 Insulting behaviour including any during work related social events;
- 5.2.7 Smoking in unauthorised areas of the Company premises;
- 5.2.8 Consumption of alcohol, non-prescribed drugs and/or any illegal substance during working hours (including breaks) on or off Company premises;
- 5.2.9 Acceptance of gifts or other benefits from those with whom the Company does business, except those of a token gesture and insignificant in value; and/or
- 5.2.10 Any other misconduct judged by the Company to be of similar gravity to that above.

6. Examples of Gross Misconduct

- 6.1 The following are examples of gross misconduct where a breach of the Company rules and standards would normally 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.
- 6.2 The list is not exhaustive.
 - 6.2.1 Breach of any Company policy or procedure;
 - 6.2.2 Theft, fraud, dishonesty, deliberate falsification of records (e.g., Call Hanging/Manipulation) or any form of dishonesty (including attempts and action calculated to assist others in such activity);
 - 6.2.3 Deliberate damage to property of the Company, a client or another individual;
 - 6.2.4 Assault on another individual;
 - 6.2.5 Harassment, or bullying, including sexual, racial, disability, religion or religious belief, sexual orientation or age or any other form of harassment or indecency;
 - 6.2.6 Being incapable of work through the influence of alcohol and/or drugs;
 - 6.2.7 Possession and/or use of illegal substances;
 - 6.2.8 Unauthorised Absence, Absence without authorised leave (AWOL);
 - 6.2.9 Serious negligence which may result in injury, damage or loss;
 - 6.2.10 Unauthorised disclosure of information confidential to the Company;
 - 6.2.11 Unauthorised use of Company communication facilities;
 - 6.2.12 Giving deliberately misleading or incorrect information prior to an Employees employment or on joining the Company;
 - 6.2.13 Refusal to carry out a reasonable request given by a person authorised to give such instructions;
 - 6.2.14 Accessing personal data of other Employees without authority;
 - 6.2.15 Failure to adhere to Company rules when using social networking sites e.g., Facebook and Twitter;
 - 6.2.16 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; and
 - 6.2.17 Any other misconduct judged by the Company to be of similar gravity to the examples quoted above.

7. Gifts and Hospitality

- 7.1 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.



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

8. Events

- 8.1 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 Employees, are invited.
- 8.2 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 this policy applies to such events. Specifically, Employees who attend work-related social events must adhere to the following rules and principles:
- 8.2.1 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;
 - 8.2.2 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;
 - 8.2.3 The Company's policy on harassment/ bullying applies to work-related social events;
 - 8.2.4 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;
 - 8.2.5 Swearing and intemperate language are unacceptable at work-related social events; and
 - 8.2.6 Employees must not behave in any way at any work-related social event that could bring the Company's name into ill repute.
- 8.3 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.
- 8.4 The above rules are in place for the benefit of all Employees 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.
- 8.5 Please refer to the Company Social Events Policy for more information.

9. Confidentiality

- 9.1 Everyone is required to comply with the UK General Data Protection Regulations (UK GDPR) when handling personal and confidential data.
- 9.2 During the course of an Employee's work, they are likely to have access to information which is private or confidential to the Company or customer. Such information may be held on electronic office equipment or in manual paper files. Employees 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 they are in employment and after leaving the Company's service.
- 9.3 Employees should refer to their terms and conditions of employment for additional information relating to confidential information.



10. Review of policy

The Company reserves the right to review and amend this policy from time to time.

11. Breach of this policy

Any Employee who breaches this policy may face disciplinary action in accordance with the Company's Disciplinary Policy and Procedure. The Company takes breaches of this policy very serious and any breach may be deemed as gross misconduct.

This policy and procedure has been approved and authorised by:

Name: Scott High

Position: People Director

Signature: