



EMPLOYEE CODE OF CONDUCT

NWH Group Limited
Reviewed- January 2026

The Company's code of conduct sets out the standards of behaviour the Company 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 Company considers to be gross misconduct which could result in summary termination of employment.

Employee behaviour

The following general standards are required by all Company 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 uphold and further the Company's positive public image at all times
- satisfactory standards of performance should be maintained at all times
- The company's policies and procedures should be adhered to at all times.

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 Company's disciplinary policy.

The following rules are required of employees:

- 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 Company'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.

Signing in and out

We operate a sign in/sign out policy with which all employees are expected to comply. Upon arrival to work, you must immediately personally sign in the time you entered the premises. Upon leaving the premises you must ensure that you personally sign out using the same system. It is not permissible under any circumstances for any employee to sign in or out on

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behalf of another. Failure to adhere to this procedure may result in summary dismissal and/or incorrect or delayed payment of wages. Depending on your role within the business, technology or devices may be in place to allow you to sign in and out, such as the Softworks app for Office employees, or through the Driver Tablet for Drivers.

Communications

Employees should have their personal mobile device either switched off, or in silent mode, during working hours. 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. Personal calls and text messages should not be made during working hours; they should only be made during your lunch or other breaks. Employees should obtain authorisation from their line manager if they need to make or receive an urgent personal phone call. In addition it is forbidden to:

- give personal phone numbers or home phone numbers to customers or clients
- take pictures of colleagues, company premises, customers or clients using personal mobile devices
- transfer files via Bluetooth or other insecure mobile networks.

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

Employees should ensure they keep the company mobile phone in good working order. The mobile phone should remain charged and connected to the network (as far as coverage permits) during working hours so business calls can be received as necessary.

When visiting clients and customers, or on other sites, you may be required to turn off your company mobile phone. Employees must observe any such requirements and ensure they comply with them.

The cost of line rental and normal business call usage will be covered by the Company.

Email and internet use

The Company 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 company equipment or during work time
- on-line gambling

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- 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 Company 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 are not permitted to send personal emails during work time unless in the case of an urgent matter when you should seek the approval of your line manager before sending the email. Employees' work email addresses should not be used to send personal emails.

Employees may access their personal email accounts during break times. This is permitted on condition that all the procedures and rules set out in this policy, and the Company's code of conduct, are complied with.

Employees are not permitted to use the internet during work time unless in the case of an urgent matter when you should seek the approval of your line manager before use.

Employees may use the internet during break times. This is permitted on condition that all the procedures and rules set out in the Company's Code of Conduct are complied with.

Social media

Social media usage for work purposes is controlled by the NWH Marketing and Brand Manager.

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

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 Company, disclose confidential data or disclose sensitive data
- damage the Company'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

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- be of illegal, inappropriate or offensive content
- interfere with your work commitments
- use the Company's name or reputation to promote any other product or any political opinions.

Employees should ensure they consider the Company's other policies on marketing, promotion, sales and branding.

Representing the Company

The Company recognises the importance of work life balance. Whilst we do not intend 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 Company, 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 Company 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 Company'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.

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Health and safety

Any accidents, however minor they may appear, should be recorded in the Company's accident book as soon as possible.

Employees are responsible for ensuring they are familiar with the Company'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 Company does not permit smoking in the workplace, either on Company premises or in Company cars. The Company 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 Company'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 Company'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 Company.

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

Flexibility

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

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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 Company

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

If an employee wishes to undertake other employment while employed by the Company, permission is required from the employee's line manager.

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. Where uniforms are provided, these must be worn at all times whilst at work and laundered on a regular basis. Where uniforms are not provided, you should wear clothes appropriate to your job responsibilities, and they should be kept clean and tidy at all times.

Upon termination of your employment you will be required to return any uniform which has been provided to you. Failure to return such items will result in the company making a deduction for the cost of the uniform from your wages/salary. This is an express written term of your employment.

Property and equipment

Employees who cause any damage to Company property through misuse, recklessness or carelessness may be required to repay to the Company the cost of repair or replacement. The Company 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 Company property, including IT equipment, stationery, company mobile phone or tablet, company car and any other items belonging to the company.

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Searches

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

The Company'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 Company.

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 Company is not responsible for the loss, theft or damage to any personal property brought by employees on to Company premises or stored in Company 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 Company 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.

Breaches

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

Gross misconduct

The following offences are examples of gross misconduct:

- unauthorised use of the Company's assets and equipment
- insubordination eg refusal to carry out duties or obey reasonable instructions, except where employee safety may reasonably be in jeopardy
- intentional sexual harassment, harassment, bullying
- serious breach of rules, policies or procedures, especially those designed to ensure safe operation

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- divulging or misusing confidential information
- theft or unauthorised possession of any property or facilities of the Company or of any employee of the company
- consumption of alcohol or drugs, or intoxication by reason of alcohol or drugs, which could affect work performance in any way or have an impact on other employees
- having illegal drugs in the possession, custody or control of the employee while at work or on the Company’s premises
- defrauding or attempting to defraud the company, its customers, suppliers or fellow employees
- unauthorised or inappropriate use of email, internet and/or computer systems
- falsification of any company records including reports, accounts, expenses claims or selfcertification forms
- serious damage to Company property
- violent, dangerous or intimidatory conduct
- bringing unauthorised person(s) onto Company premises
- conviction of any criminal offence which may render the employee unsuitable for the role
- serious abuse of time-keeping and attendance procedures
- failure to follow a Company standard operating procedure.

Signed:

Date: 15/01/2025

Gavin Money

Managing Director

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