

	Reference Number:	HR Policy-Code of Conduct			Code of Conduct
	Version Number:	03	Effective Date:	12/07/2016	

# Code of Conduct

## 1. Introduction

Toppesfield is committed to operating with integrity, respect, openness and the highest standards of work and conduct in all of its relationships.

## 2. Compliance and Conduct

Toppesfield's reputation is a key asset. In order to protect this key asset and continue to build a successful business with strong relationships with clients, suppliers and others it is vital to maintain not only legally compliant but exceptional standards of conduct. This should be achieved by demonstrating ethical business practices and acting fairly and responsibly in its dealings with others.

In particular, certain behaviours are damaging not only to our reputation but to the industry and society in general and these will not be tolerated:

- Any form of bribery or corruption.
- Any form of fraud or any other false claims or knowingly inaccurate representations.
- Any collusion with others which is intended to affect the fair outcome of any commercial decision.
- Gifts or hospitality which are excessive and outside the ordinary course of business.
- Any anti-competitive practices or abuses of any position of dominance.

## 3. Employee Role

Toppesfield expects all of our employees to observe the following general rules when interacting with stakeholders such as fellow employees, its clients, agents and suppliers:

- Demonstrate integrity, honesty and fairness at all times and protect Toppesfield's reputation.
- Achieve and maintain a high standard of workmanship and show a conscientious approach.
- Avoid conflicts of interest at all times and if one arises, report it and seek guidance on how to deal with it.
- Treat any commercially sensitive information appropriately, maintaining its confidentiality and not misusing it.
- Comply with all laws which affect us in our activities.

## 4. Health and Safety

The well-being of employees is essential and Toppesfield will ensure it provides a healthy and safe work environment for all. We have developed safe practices for working and are committed to continually reviewing and improving these. We expect all employees to:

- Comply with health and safety procedures at all times.
- Report any accident, injury, illness, or unsafe working condition immediately.
- Not undertake any work that you are not appropriately qualified to perform.
- Ensure your performance is not impaired, for example by a lack of sleep, alcohol, or any drugs – including prescription or over the counter medication.
- Adhere to our policies on the use of personal protective equipment.

For further information, please refer to the Health and Safety Policy Statement.

## 5. Quality

Toppesfield strives to ensure complete customer satisfaction, and that all customers receive a high quality of service. In particular, Toppesfield:

- Maintains a quality management system and expects all employees to comply with these standards at all times.
- Expects customer needs and outcomes to be determined and fulfilled.

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- Is committed to continually monitoring and improving its quality performance and the effectiveness of its quality management system.

For further information, please refer to Quality Policy Statement.

## 6. Diversity, Respect and Fairness

We take pride in the diversity of our workforce. The company expects our employees to be committed to encouraging a diverse and inclusive culture and treat everyone with fairness, respect and dignity. We will:

- Respect the individuality and personal values of colleagues, suppliers and clients.
- Treat everybody with respect.
- Encourage and listen to those who speak up.
- Promote equal opportunity for all.

For further information, please refer to the Equality and Diversity Policy.

## 7. Protection of Assets

The assets of Toppesfield shall not be misused; they shall be employed primarily and judiciously for the purpose of conducting the business for which they are duly authorised.

- If you suspect any asset is not being used for business purposes or you believe you have experienced or witnessed a theft or damage to assets then report it straight away to your line manager.
- Resources such as computers (including internet and email), mobiles, photocopiers and similar technologies are provided to enable you to perform your work in support of the business.
- Employees are not permitted to remove material or equipment of any kind from the Company or any other place of work without prior written permission

For further information, please refer to Company Property Policy.

## 8. Protection of the Environment

Toppesfield employees are expected to conduct their work in a manner compatible with the company's environmental policy and objectives.

- We endeavour to reduce the consumption of fuel, energy and water and use renewable and/or recyclable resources wherever possible.
- We have set, and will maintain, review and revise, environmental objectives and targets with the aim of continually improving our environmental performance.
- Dialogue and briefings will be maintained to ensure that all employees are aware of the environmental policy and employees will be provided with the information, instruction and training required to fully implement and operate this policy.

For further information, please refer to the Environmental Policy Statement and Sustainability Policy Statement.

## 9. Information Systems, Email and Social Media

Internet and email is provided by Toppesfield for business purposes.

- Our communication systems should on no account be used for unsavoury or inappropriate contents such as; harassment, violence, racism, sexism or other offensive material.
- All Toppesfield employees must apply the same method as hard copy communications when sending and receiving messages, emails and attachments.
- Toppesfield expects employees to apply the principles of this code of conduct if posting images or text involving work colleagues on social media platforms.

For further information, please refer to the Social Media Policy.

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## 10. Anti-Bribery, Gifts and Corporate Hospitality

Toppesfield business decisions will never be influenced by gifts or hospitality, and we will never try and influence the decisions of others in this way.

- Our employees may not accept gifts in connection with their employment unless permission is received from their line manager.
- Respect and comply with Toppesfield policy regarding gifts and entertainment
- Ensure any gifts and entertainment are notified to management to place on the 'Gifts and Hospitality Register'
- Toppesfield may provide business courtesies but only infrequently and at moderate value.

For further information, please refer to the Anti-Bribery, Gifts and Hospitality Policy.




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Matthew Pryor  
 Managing Director  
 29<sup>th</sup> April 2016