

<b>Employee Code of Conduct</b>	Quality/ Environmental Procedure/ Policy	WCL:	2
		Issue:	2.1
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## 1 Scope

- 1.1 At Waterside Colours, we are committed to maintaining the highest ethical standards in all aspects of our business operations.
- 1.2 This Code of Conduct outlines our expectations from all employees regarding personal & professional behaviour, public comment, use of company resources, corruption, conflict of interest, fraud, money laundering, anti-competitive practices, and information security, Intellectual property/ copyright, relationships with customers and suppliers, occupational health & safety.
- 1.3 The Code of Conduct applies to all employees and contractors representing Waterside Colours operations.

## 2 Responsibility

### 2.1 Managers & Supervisors

- 2.1.1 Managers and supervisors are responsible and accountable for:
- Undertaking their duties and behaving in a manner that is consistent with the provisions of the Code of Conduct.
  - The effective implementation, promotion and support of the Code of Conduct in their areas of responsibility.
  - Ensuring employees under their control understand and follow the provisions outlined in the Code of Conduct.

### 2.2 All Employees

- 2.2.1 All employees are responsible for:
- Undertaking their duties in a manner that is consistent with the provisions of the code of conduct.
  - Reporting suspected breaches of the code of conduct following “WCL5 – Whistleblower policy”

## 3 Related documents

Title:	QEMP Ref:
Staff Handbook	WCL 1
Ethical Trading Policy	WCL 3
Modern Slavery & Human Trafficking	WCL 4
Anti-slavery Statement	WCL 4.1
Whistleblower Policy	WCL 5

## **4 Procedure**

### **4.1 Overview**

4.1.1 Although Waterside Colours is based in the United Kingdom, it has employees, suppliers and customers across the globe, and as such has dealings with people from a diverse background and has to navigate laws, agreements and regulations from various bodies. It is therefore essential that all staff recognise and respect not only their own rights and responsibilities, but also the rights and responsibilities of other members of the community and those of Waterside Colours.

4.1.2 Waterside Colours also recognises that many of their professional employees are also bound by codes of conduct or ethics defined by learned or professional societies or groups. It is recognised that these codes are not always in harmony. It is an obligation of a staff member to weigh the importance of these codes in each particular set of circumstances and notify an appropriate officer of Waterside Colours where such conflict may arise.

### **4.2 Personal & professional behaviour**

4.2.1 You should not behave in a way which has the intent or effect of offending or embarrassing other employees or the public in a manner contrary to legislative requirements.

4.2.2 When carrying out your duties, you will:

- Obey any lawful direction from a person who has the authority to give the direction. If you have a dispute about carrying out a direction, you may appeal to your senior Manager.
- Behave honestly and with integrity. You will avoid behaviour that could suggest that you are not following these principles. This will include a duty to report other employees who are behaving dishonestly.
- Make sure that you carry out your work efficiently, economically, and effectively as you are able, and that the standard of your work reflects favourably on yourself and the company.
- Follow the policies of the company in all aspects of work to achieve outcomes that are socially responsible and sustainable.
- Treat employees, clients, and stakeholders with respect.
- Maintain individuals' rights to privacy and undertake to keep personal information in confidence.
- Do not use, possess, or distribute pornographic or offensive materials.
- Comply with all provincial, national, and international laws.
- When representing the Company in public forums:

4.2.3 Employees at all levels represent the Company in the course of their employment including when travelling on Company business, attending functions on behalf of the Company or internal Company meetings, conferences, training programs, seminars, or any other function. Your behaviour in all these circumstances reflects on the Company and its image. As such, you should act in an appropriate business-like manner that will in no way harm the image of the Company or infringe any other Company policy including the Discrimination Free Workplace Policy. Where any Company function or meeting is held that involves the availability of alcohol, steps should be taken to ensure that it is not abused. You should be aware that being work-related, behaviour in those situations can be subject to disciplinary procedures.

#### 4.3 **Public comment**

4.3.1 Individuals have a right to give their opinions on political and social issues in their private capacity as members of the community. Employees must not make official comment on matters relating to the company unless they are:

- Authorised to do so by the General Manager.
- Giving evidence to court.
- Otherwise authorised to do so by law.

4.3.2 Employees cannot release the contents of unpublished or privileged knowledge unless they have the authority to do so.

#### 4.4 **Use of company resources**

4.4.1 Employees must ensure responsible management and security in the use of Waterside Colours resources and any resources managed by them for or on behalf of others.

4.4.2 Requests to use company resources outside core business time should be referred to management (or person authorised to handle such matters), for approval. If employees are authorised to use company resources outside core business times, they must take responsibility for maintaining, replacing, and safeguarding the property and following any special directions or conditions which apply.

4.4.3 Company resources can include equipment, typing facilities, photocopiers, computers, tools, motor vehicles etc.

4.4.4 Employees using company resources without obtaining prior approval could face disciplinary action (up to and including termination for cause) and/or criminal action. Company resources are not to be used for any private commercial purposes (e.g., for 'profit' purposes) under any circumstances.

#### 4.5 **Corruption**

4.5.1 All employees must not engage in any form of bribery, kickbacks, or corrupt practices.

4.5.2 Any interaction with government officials must comply with relevant local laws and regulations.

4.5.3 Any gifts, entertainment, or favours given or received must be nominal, lawful, and not influence business decisions.

#### 4.6 **Conflict of interest**

4.6.1 Employees must avoid situations where personal interests conflict with those of the company.

4.6.2 Full disclosure of any potential conflicts of interest are mandatory. Failure to disclose a conflict of interest can result in disciplinary action.

#### 4.7 **Fraud**

4.7.1 Any form of fraudulent activity, including misrepresentation of information, or manipulation of records is strictly prohibited.

4.7.2 All financial transactions must be accurately recorded and reported.

#### 4.8 **Money laundering**

4.8.1 Waterside Colours adheres to the relevant UK laws and regulations regarding money laundering (e.g., Money Laundering Regulations 2017).

4.8.2 Employees must report any suspicious activities related to money laundering through the company's "Whistleblower policy – WCL5".

#### **4.9 Anti-competitive practices**

- 4.9.1 In the UK, anti-competitive behaviour is prohibited under Chapters I and II of the Competition Act 1998 and may be prohibited under Articles 81 and 82 of the EC Treaty<sup>1</sup>. These laws prohibit anti-competitive agreements between businesses and the abuse of a dominant position in a market. The Competition and Markets Authority (CMA) is responsible for enforcing competition law in the UK. The CMA has the power to investigate suspected anti-competitive practices and take enforcement action against businesses that breach competition law.
- 4.9.2 Waterside Colours adheres to the relevant UK laws and regulations regarding anti-competitive behaviour, and any employee who believes the practice is going on has a duty to report it through the company's "*Whistleblower policy – WCL5*".

#### **4.10 Information security**

- 4.10.1 Waterside Colours does not operate an Information Security Management system, such as BS EN ISO 27001:2023, as the company does not deem the risk to information security appropriate to introduce the measure.
- 4.10.2 Employees are to ensure all confidential & sensitive information, in any form, physical or digital, cannot be accessed by unauthorised persons. Physical documents belonging to the company, or containing company information should be stored on site, unless given explicit permission by the General Manager. If at a customer site, ensure documents are not left unattended and are retained. Digital documents should be stored on the company Onedrive, documents are not to be stored locally on the computer to ensure documents are not lost.
- 4.10.3 Employees are to ensure confidential information is not shared with people who are not authorised to have access to it. It is considered gross misconduct to deliberately release confidential documents, or information, to unauthorised persons, and to do so may incur disciplinary action, up to and including termination for cause.

#### **4.11 Intellectual property/ copyright**

- 4.11.1 The term 'intellectual property' includes the rights relating to scientific discoveries, industrial designs, trademarks, service marks, commercial names and designations, and inventions.
- 4.11.2 Waterside Colours is the owner of intellectual property created by employees in the course of employment unless a specific prior agreement has been made. Employees must clarify the intellectual property position before making any use of that property.

#### **4.12 Relationships with customers and suppliers**

- 4.12.1 Waterside Colours is committed to providing products and services that meet the requirements of our customers.
- 4.12.2 The purchase of goods and services should be based on quality, price, service, ability to supply and the supplier's adherence to legal and ethical business practices.
- 4.12.3 Our relationship with each customer is entered into in the spirit of a long-term partnership, which is predicated on making the customer's interests our interests.
- 4.12.4 Employees will not engage in price fixing, collusion or any related practise that may be, or give the appearance of being, illegal or unethical. Employees should avoid contact with competitors, suppliers, government agencies and other parties that are, or who appear to be, engaging in unfair competition or the restriction of fair trade.
- 4.12.5 Business interactions with our competitors should be limited to those necessary for buyer- seller agreements, licensing agreements or matters of general interest to industry or society. All such interactions should be documented.

#### 4.13 Occupational health & safety.

4.13.1 It is the responsibility of all employees to act in accordance with the Occupational Health & Safety Management System of Waterside Colours as well as their responsibilities which fall within the Health & Safety at Work Act 1974 (HSAWA1974).

4.13.2 The HSAWA1974 outlines that as an employee you must:

- Follow the training you have received when using any work items Waterside Colours has given you.
- Take responsible care of your own and other people's health and safety.
- Co-operate with Waterside Colours on health and safety.
- Tell someone (The general manager, your supervisor, or the HSE Coordinator) if you think the work or inadequate precautions are putting anyone's health and safety at serious risk.

4.13.3 If there's a problem, you have a responsibility to:

- If you are worried about health and safety at Waterside Colours, talk to the General Manager, your supervisor, or the HSE Coordinator.
- You can also look at the HSE (Health and Safety Executive) website for general information about health and safety at work.
- If, after talking to the General Manager, your supervisor, or the HSE Coordinator, you are still worried, you can find the address of your local enforcing authority for health and safety and the Employment medical advisory service via HSE's website: [www.hse.gov.uk](http://www.hse.gov.uk)

## 5 Document Control

Issue Number	Issue Date	Reason for change
1.0	Nov 2017	Start of document
2.0	Jul 2023	Updated to include sections on money laundering, & anti-competitive practices,
2.1	Nov 2024	Reviewed without change