



# Code of Business Ethics Policy

## Policy Statement

At Cardinal Security we recognise the importance of credibility, integrity and trustworthiness to our success as a business. We are committed to upholding high ethical standards in all our operations, everywhere within the United Kingdom. We believe in the principles of honesty, fairness and respect for individual freedoms.

Therefore Cardinal Security is committed to protecting employees, customers, clients, partners, stakeholders, contractors, sub-contractors, visitors, suppliers, consultants and the organisation from illegal or damaging actions by any individual, either knowingly or unknowingly. When the organisation addresses any issues of this nature proactively and uses correct judgement, it will help set us apart from our competitors.

Cardinal Security will not tolerate any wrongdoing or impropriety at any time and the organisation will take appropriate measures to act quickly in correcting the issue if this ethical code is broken. Any infractions of this code of ethics will not be tolerated. In an area, which can sometimes be difficult and complex, this code of business ethics and conduct is intended to assist staff in performing to the highest possible standards.

## Director and Senior Management Commitment to Ethics

Directors and senior management within Cardinal Security must set a prime example. In any business practice honesty and integrity must be a top priority for senior members of the organisation, leading by example.

Directors and senior management must have an open door policy and welcome any suggestions and concerns from employees relating to relevant matters. This allows all employees to feel comfortable discussing any issues and will alert senior management to concerns within the workforce.

Directors and senior management must disclose any conflicts of interest in regards their position within the organisation.

## Employee Commitment to Ethics

Employees within Cardinal Security will treat everyone fairly, have mutual respect, promote a team environment and avoid intent and the appearance of unethical and or compromising practices.

Every employee needs to apply effort and intelligence in maintaining ethics values.

Employees must disclose any conflicts of interest in regards their position within the organisation.

Employees can help the organisation to increase client, customer and stakeholder satisfaction by providing quality services and a timely response to any enquiries.

In summary, Employees must:

- Declare in writing any potential conflict of interest that might affect their impartiality in carrying out their duties.
- Not accept gifts or favours from customers or suppliers, which could compromise dealing with them objectively and in the best interests of Cardinal Security.
- Maintain confidentiality of information acquired through their employment at all times, including after the termination of their employment.
- Not release any statement or make any comments on behalf of the organisation, or in relation to the organisation, to any representatives of the media, without the written authority of the organisation.
- Protect the organisations Intellectual Property Rights
- Behave in an appropriate manner regarding the use of IT

## Company Awareness

Promotion of ethical conduct within Cardinal Security will be undertaken by the publishing of the policy and by line management ensuring that employees are reading and understanding the code of ethics annotated within. The organisation will also promote a trustworthy and honest atmosphere to reinforce the vision of ethics within the company.

## Maintaining Ethical Practices

Cardinal Security will reinforce the importance of the message and the tone starting at the top, including directors and senior management. Every director, manager and employee needs to consistently maintain an ethical stance and support ethical behaviour. Employees within the organisation should encourage open dialogue, get honest feedback and treat everyone fairly and with honesty and objectivity.

## Unethical Behaviour

Cardinal Security will avoid the intent and appearance of unethical or compromising practice in relationships, actions and communications.

Cardinal Security will not tolerate harassment or discrimination in any of its forms.

Unauthorised use of any of the organisations trade & marketing, operational, personnel, financial and or technical information integral to the success of the organisation will not be tolerated.

Cardinal Security will not permit impropriety at any time and will act ethically and responsibly in accordance with any relevant U.K legislation.

Employees of Cardinal Security will not use corporate assets or business relationships for personal use or gain.

## **Conflict of Interests**

Cardinal Security supports and encourages a spirit of enterprise among all employees. Staffs are free to engage in any activity outside normal working hours provided that in doing so they do not in any way impair their ability to give regular, punctual and satisfactory service to the organisation in accordance with their contracts of employment.

Notwithstanding this, it is necessary for the organisation to ensure at all times that no employee is engaged in outside activities, business, or has other financial interests, which may be in competition or in conflict with the interests of the organisation. Employees should not, during their employment, and except with the written consent of the organisation, be directly or indirectly engaged, concerned or interested in any other trade, actual business, occupation or business arrangement whatsoever.

The primary duty of employees is to give regular and undivided attention to their work. Any activity, which impedes an employee from carrying out their duty, involves a breach of the contract of employment and leaves the employee open to disciplinary action, up to and including possible dismissal, is prohibited.

Employees currently involved in any gainful employment and/or the running of any business or company outside of Cardinal Security, or who may have a significant financial interest in any such business, must inform the Human Resources Department in writing immediately. This also applies to consultancy and contract work undertaken by employees outside of their employment.

It is the responsibility of every employee, to disclose to the Human Resources Department, any private interests that may potentially be a source of conflict. Employees in doubt as to whether a particular personal activity or interest is governed by this regulation should consult the Human Resources Department for an interpretation of this policy.

Cardinal Security reserves the right to instruct employees to discontinue their involvement in any activity or interest, which the organisation deems to be in actual conflict with its interests or national legislation.

Cardinal Security may also request employees to discontinue their involvement in any activity, which could potentially be in conflict with the interests of the organisation or impair the ability of employees to perform their work satisfactorily or have an adverse effect on their punctuality/attendance.

As a general guide to employees, the following outside activities would be prohibited under this policy:

- An activity or substantial investment in any enterprise connected with the security industry or any other commercial activity with which Cardinal Security is involved.
- Any commercial, financial or investment interests in companies which are customers or suppliers of Cardinal Security.
- Employees who pursue, or intend to take up, an outside activity, which may affect the organisation's interest or is of a business nature, must report this activity to the Human Resources Department. Similarly, in the case of the specific activities listed above, notice must also be given to the Human Resources Department if an employee's spouse or close relative is involved in, or intends to pursue such an activity.
- Employees who, in the course of their duties, become involved in issues associated with an outside business, in which they have an interest, must immediately disclose this to the Human Resources Department as appropriate.

The Head of Human Resources will consider the implications of each case on its individual merits and consult with Senior Management as necessary. In certain cases the employee may be requested not to take up, or may be requested to discontinue engagement in the outside occupation or activity concerned, or to dispose of the financial interest. Alternatively, changes may be made to the employee's responsibilities or terms of reference to avoid the possibility of a conflict of interest(s).

Cardinal Security may request an individual who is engaged in remunerative activity to report on the scale of this activity from time to time.

Employees are not prohibited from academic pursuits for reward, such as lecturing, provided they do so in their own time. They should, however, notify the Human Resources Department before undertaking commitments of this nature.

## **Membership of Nationally Elected Assemblies (e.g. parliament) or Local Bodies**

Employees who are elected to Nationally Elected Assemblies (e.g. parliament) will be given leave of absence without pay for the appropriate period. This leave will normally arise from the date of an individual's election. An employee who becomes a member of Nationally Elected Assemblies will not be entitled to count the period of membership for any Superannuation benefits payable under the organisation's Superannuation schemes.

Employees are also free to become members of a local body, such as County Council or City Corporation, provided such an appointment does not interfere with their duties to the organisation. Employees must, however, inform the Human Resources Department in writing of their election.

## **Intellectual Property Rights**

Any "Intellectual Property" which is made, discovered, created or generated by an employee, which relates to or affects the business of Cardinal Security, or which is capable of being used or adapted for use in connection with Cardinal Security, shall remain the property of the organisation. It is each employee's responsibility to protect the organisation's Intellectual Property Rights.

## **Confidentiality**

Employees must not disclose, publish or communicate to anybody, any confidential information relating to the business of the organisation, its trade secrets, products or affairs, which may have come to their knowledge during their employment. Where an employee breaches confidentiality, Cardinal Security reserves the right to implement disciplinary measures.

## **Breach of Ethics and Enforcement**

Any employee found to have violated this Business Ethics Policy and or breached this Code of Business Conduct will be regarded as breaches of discipline and will be dealt with in accordance with the disciplinary procedure. Serious breaches could result in summary dismissal including and up to termination of employment.

Any deviation and or infractions of this code of ethics will not be tolerated and Cardinal Security will act quickly in correcting the issue if the ethical code is broken.

## **More Information**

This Code of Business Ethics Policy should be read in conjunction with the organisations Anti-Bribery Policy and which can be found within the organisations policy booklet or on SharePoint.

## **Policy Revision**

This policy will be revised annually in order to keep abreast of changes to associated regulations, law and/or the needs of the business.