



**ROCK**  
COMPLIANCE

# **ETHICAL CODE OF CONDUCT POLICY**

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**Version 2**



# ETHICAL CODE OF CONDUCT POLICY

## Version Change Summary

| New Version ID | Date of Change | Summary of Changes |
|----------------|----------------|--------------------|
| 1              | 31/10/2021     | Creation           |
| 2              | 11/08/2023     | Policy Review      |
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### 1. ETHICS

We always conduct our own services honestly and honourably, and expect our employees, clients, associates and suppliers to do the same. In providing the delivery of our services, we take proper account of ethical considerations. The below provides our commitment to an ethical code of conduct.

### 2. DUTY OF CARE INCLUDING HEALTH, SAFETY AND ENVIRONMENT

We believe that all businesses and organisations, including this company, should avoid causing any adverse effect on the human rights of people in the organisations we deal with, the local and wider environments, and the well-being of society at large. We are committed to the prevention of injury and ill-health to our employees and others, to environmental protection and prevention of pollution and to achieving our compliance obligations.

We will operate as a Considerate Contractor and provide a healthy and safe environment. We demonstrate this through the establishment, implementation, maintenance and continual improvement of our Safety, Health and Environment Management Systems. We are certified to ISO14001:2015 Environmental Management System Standard, and Safety Schemes in Procurement (SSIP).

### 3. EQUALITY, INCLUSION DISCRIMINATION

We always strive to be fair and objective in our advice and actions, and we are never influenced in our decisions, actions or recommendations by issues of irrespective of ethnicity, colour, race, nationality or ethnic origin, mental or physical disabilities, age, marital or civil partnership status, actual or perceived sexual orientation, gender, gender identity or gender re-assignment, pregnancy or maternity, parental or carer responsibilities, religion or belief, or trades union membership. These are known as their enhanced “protected characteristics”.

We do not tolerate any form of harassment, bullying, victimisation or intimidation of our employees or others, by internal or external parties.

#### **4. GRIEVANCE**

We have an established grievance procedure that any employee, supplier or other party can enact where they have a grievance regarding unfair treatment.

#### **5. FREEDOM OF ASSOCIATION AND FREE SPEECH**

We support employees' rights to join a trade union and to free speech.

We will always listen and review employee's grievances and recommendations for improvement.

#### **6. TRAINING AND DEVELOPMENT**

Our employees are our strongest resource, and we have an established training and development process. As a minimum, employees will have the required health and safety training to comply with the law. We will encourage all employees to complete relevant NVQs and other skills and knowledge development courses. Where we invest heavily into developing an individual, we reserve the right to issue a Training Contract to that individual, where the employee is contractually obliged to pay back an agreed proportion of the cost of the training should they voluntarily leave the employment of the company.

We regularly review the performance of our employees to ensure they are achieving their objectives.

#### **7. FAIR PAY AND CONDITIONS**

We ensure non-exploitation of employees, contractors or suppliers, either regards cost or expectations including working hours and deliverables.

We will comply with the Working Time Regulations 1998 and railway industry working time regulations. We invite our employees to sign voluntary opt-out agreements whilst respecting the rights of individuals who do not choose to opt-out. Whilst this allows working more than the average 48-hour week, we will not exploit our employees or others by requiring excessive working hours. Those working more than 60 hours per week will be subject to additional supervision. No person shall work more than 72 hours per week, or not have at least one shift off in every fourteen shifts worked.

We respect the right of our employees to have Freedom of Movement, and to choose to leave the company's employment at any time, whilst meeting their contractual obligation to provide due notice. However, we require that employees honour their moral duty not to

engage in anti-competitive practices or impact on the reputation of the company by mis-using the knowledge they have on company practices.

Although not a large company, we recognise our moral duty under the Modern Slavery Act. We ensure our own employment practices are legal and ethical and that we only purchase from reputable suppliers. As far as reasonably possible, we ensure that our supply chain doesn't include forced labour or child labour.

## **8. CUSTOMER CONTRACTS**

Our contract will usually be in the form of a detailed proposal, including aims, activities, costs, timescales and deliverables. The quality of our service and the value of our support provide the only true basis for continuity. We always try to meet our clients' contractual requirements.

Our fees are always competitive for what we provide. As such, we do not generally offer arbitrary discounts; generally, a reduction in price is only enabled by reducing the level or extent of services to be delivered. That said, we always try to propose solutions that accommodate our clients' available budgets and timescales.

We agree our fees and basis of charges clearly in advance, so that we and our clients can plan reliably for what lies ahead, and how it is to be achieved and financially justified. We do not tolerate bribery, corruption, fraud or anti-competitive practices and have defined policies on this.

Payment arrangements will be agreed at point of purchase order issue. Ethics is a two-way process and we expect our customers to make payments by the date agreed by contract. Our terms are generally net monthly in arrears.

## **9. CONFIDENTIALITY**

We are committed to maintaining the highest degree of integrity in all our dealings with potential, current and past clients and suppliers, both in terms of normal commercial confidentiality, and the protection of all organisational knowledge, intellectual property rights and personal information received in the course of providing the business services concerned.

## **10. PUBLIC DISCLOSURE OF MANUFACTURING LOCATIONS**

Whilst we only manufacture in our North West region, we have an open book policy in regards our supply chains. We evaluate and assess our supply chain, which requires them to be committed to the same standards as those contained in this Ethical Code of Conduct Policy.

## **11. PROFESSIONAL CONDUCT**

We conduct all of our activities professionally and with integrity. We take great care to be completely objective in our judgement and any recommendations that we give, so that issues are never influenced by anything other than the best and proper interests of our clients.

## **12. QUALITY ASSURANCE**

We support the concept of Plan-Do-Check-Act, We maintain the quality of what we do through providing competent human resources, compliant and effective plant, and good planning, delivery and review processes.

We encourage constant ongoing review with our clients, of all aims, activities, outcomes and the cost-effectiveness of every activity. Our quality management systems are certified to ISO9001:2015 standard.

## **13. POLICY REVIEW**

This policy will be reviewed periodically and following any change to legal or business requirements and as part of continual improvement and preventive actions.



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