HR Policies & Procedures		Document no:	HR-POL-030
		Issue date:	Aug 2026
Ethical Policy		Revision no:	4
		Review date:	Aug 2028
Owner:	Rhodri Stanford	Approver:	Tanya Fisher

Olleco Code of Conduct

The way in which we work together as a team to achieve our vision and ensure our customers are at the centre of everything we do is vital to the success of Olleco. This is only possible by ensuring that during working hours all efforts and energies are concentrated on achieving work objectives. We expect you to conduct yourself in a reasonable manner, at all times, towards any person with whom you come into contact on behalf of the Company. We also expect you to observe reasonable instructions or requests issued by those authorised to act on our behalf.

Every employee, worker or consultant should act in the best interests of the Company, honestly and in good faith and in line with the company values.

We have no wish to intrude upon your activities or interests outside work. However, we expect you not to engage in any activity outside working hours which:

- Could result in adverse publicity to our organisation.
- Potentially causes us to question your integrity.
- Prevents you from performing your duties/responsibilities to our satisfaction.
- Prevents us meeting our legal obligations.

Confidentiality

During your employment you will inevitably see and use sensitive and confidential data about the organisation and its stakeholders. This may relate to other employees, clients, suppliers etc. It is important to recognise that this is privileged information.
You must not, except in the proper performance of your job or as required by law, disclose confidential information relating to our organisation. This also applies where we must respect an obligation of confidence to anyone else. This is both a legal and contractual obligation which continues even after you leave our employment.
Confidential information/data includes but is not limited to:

- Information/data about other employees, customers, clients, suppliers etc.
- Unpublished financial accounts or statistical data. Trading or operational procedures, methodology or analyses.
- Process, designs and products in development or subject to modification.

This applies where you acquire the information/data through your employment. And where it would not be publicly available other than by your disclosure. You must not disclose such information to any other person or organisation. This applies irrespective of whether you are doing so for your own purpose or benefit, or for any other reason.

You must not remove or transmit any of our documents, material or data physically or electronically. You must not send/store our information/data onto your own or any external storage device or medium. This includes copying documents to external websites, such as drop box, and emailing documents to personal emails addresses. We must specifically authorise any deviation from this policy in advance. The only exceptions are where you do so in the proper performance of your job or as required by law and you are utilising appropriate security measures to execute these duties.

You must use your best efforts to prevent disclosure, publication or misuse of confidential material by anyone else. This includes not participating in any paid research, surveys or interviews. Please report any suspected breach to us immediately.

You must return to us when we request, and in any event when your employment ends, all our documents and equipment. This includes information belonging to us which you may have stored on portable or external electronic media locations. Where we request, you must delete, destroy, remove or erase confidential information contained in documents, electronic storage media/devices, disks etc. This applies to all material in your possession or under your control, irrespective of its location.

In addition to confidential information, you may hear personal information relating to a colleague, whether from them directly or others. Every member of the Olleco team is expected to act with discretion and in a respectful, inclusive and considerate way towards one another. Respecting one another's right to privacy is a fundamental part of this.

Bribery, Gifts and Hospitality

The Bribery Act 2010 makes it an offence to offer, promise or give a bribe. It is also an offence to request, agree to receive or accept a bribe.

A bribe is "a financial or other advantage offered or requested with the intention of inducing or rewarding improper performance of a relevant function or activity". It also applies where you "know or believe that acceptance would constitute improper performance of a function or activity".

It is our policy to conduct our business in an open, honest and transparent way. We do not condone the use of corrupt practices or acts of bribery to obtain an unfair advantage. We adhere to the highest ethical standards and this is reflected in every aspect of the way in which we operate. We do things the right way.

You must be alert to others attempts of inappropriate influence upon you or

engaging in/facilitating bribery. This is especially relevant to those procuring goods or services or dealing with third parties on our behalf. For instance, you may be offered excessive hospitality or gifts to facilitate business dealings. You must not accept any inducement designed to influence you inappropriately in the performance of your job.

Do not accept money, gifts or other rewards from customers, suppliers, or any other person or organisation with whom we do (or might develop) business. This avoids any misunderstandings or allegations of impropriety. Where you receive small, genuine tokens of appreciation or gratitude which are commensurate with common practice in our organisation you must pass these to your line manager. They will be added to a raffle to provide all employees with a chance of benefiting from the gesture. You must not treat the person/organisation that provides such gift more favourably than other clients/suppliers, etc.

It is important you do not act inconsistently with our standards or, however inadvertently, damage our, or your, integrity. Accepting a gift which influences or could be seemed to influence your actions or decisions on our behalf may do this.

If unsure, check first with your line manager. This policy does not apply to promotional items such as stationery or pens with a logo or company name. This is always on the basis that the items have no significant value. We are committed to this policy and take a “zero tolerance” approach to any act of bribery or corruption by a member of staff.

Media and Public Statements

You must not make public statements or communicate with the media about any matter relating to our organisation.

You must obtain permission before agreeing to give any lecture, media interview or to publish any article or comments. You must not supply information without approval (whether in writing or electronically) which in any way impacts upon our organisation.

This extends to comments you make or images you upload to blogs and social networking sites like Facebook, You Tube, Twitter, Indeed or Glassdoor. Ensure you are familiar with our Social Media policy.

Other Employment and Outside Interests

Normally we will not object to other employment as long as you request permission. You must not undertake other employment without approval. We act like owners, and as such, you must not engage in other activity, paid or unpaid, which interferes with performing your role. If we give you permission, you must notify us of all the hours you work. We need this to make sure there is no infringement of Working Time Regulations. We do not allow employment that directly competes or conflicts with our interests. Anything you propose to do which may adversely reflect

on our organisation will not be approved. We reserve the right to withhold consent at our absolute discretion.

You must not undertake work for others during your working hours and/or use our facilities or materials. You must always obtain specific approval in advance and this will only be agreed in exceptional circumstances.

You must ensure that any outside interests are not or could not be perceived to be a conflict of interest with Olleco and your employment. Where this may exist you must report the matter to your line manager immediately. This includes where you or a close relative own shares or hold a senior position in a company which is part of the Olleco supply or customer chain.

Work Related Activities

If you attend work-related activities outside working hours please conduct yourself in an appropriate, mature and responsible manner. This means being safe, inclusive, respectful and considerate at all times. This includes clients' and our own social events. Do not do anything that may harm this organisation or bring it into disrepute. Examples of unacceptable behaviour include:

- Drunkenness
- The use of illegal drugs
- Unwelcome familiarity or harassment
- Violence or threats of violence
- Serious verbal abuse

Competitive Behaviour

We believe in competing fairly and vigorously in our market sectors. We do not allow the Company to enter into any agreement or understanding which in any way illegally restrains or limits free competition. As an employee you must not participate in any action of this kind.

Political Activities

Olleco, as a company may take positions on political issues and lobby on behalf of its interests and goals, but always in strict conformance with applicable laws. Employees who communicate with government officials on behalf of Olleco should make themselves fully aware of the laws and regulations which apply to them and the Company. Olleco respects the right of the individual to be involved in and participate in the political process. However, you must ensure it is clear that your actions and opinions are your own and not those of Olleco. Company resources may not be used to promote your personal political views.

Human Rights and Worker Welfare

We care, Olleco is committed to ensuring the engagement and welfare of every individual in the diverse organisation.

Committed to protecting human rights Olleco will not tolerate child labour, forced labour, physical punishment or discrimination of any kind. We comply with UK labour laws we ensure every employee and worker is treated with dignity and respect. Our policies ensure that this is understood and enforced across the business. We have clear policies in place for Child Labour, Modern Slavery, Flexible Working and Parental Leave to support labour diversity. Our employee voice activities provide us with the opportunity to understand employee concerns on a regular basis and to foster engagement at all levels.

Health and Safety

'Safety First' is Olleco's commitment to delivering an incident free working

environment for everyone. ‘Safety First’ is the key ethos throughout the organisation. Not only complying with legal requirements we strive for best practice in all areas. The SHEQ policy sets out the formal position, however Safety is owned by every member of the organisation. We are all responsible for following the safely guidelines, using the equipment provided and taking the necessary care to safeguard our own, and our colleagues, wellbeing.
Ensure you have understood and signed the Olleco Safety Charter.

Reporting and Enforcement

We are responsible for ensuring our actions are always consistent with the ethical principles and rules outlined in this policy and the associated documents. Our responsibility, however, does not end there. If you observe conduct that might be a violation of the Ethical business policy, or a breach of the Olleco values, you must raise the issue promptly.

Any infractions of this policy will not be tolerated. Employee breaches of this policy may be considered gross misconduct and employees behaving in an inappropriate way as defined in this policy may be subject to disciplinary action up to and including dismissal.

The Disciplinary and Grievance policies set out the procedures in relation to these matters.
Concerns can be raised with your line manager, HR or even through the third-party Whistleblowing hotline, where you can elect to remain anonymous should you wish. They can be contacted on 0800 374199.

Associated Policies and Documents

- Anti-Bribery Policy
- Child Labour Policy
- Contracts of Employment
- Data Protection
- Disciplinary Procedure
- Whistleblowing Policy
- Environmental policy
- Grievance Procedure
- Information Technology
- Modern Slavery Policy
- Outside Interests Policy
- Receipt of gifts
- Remote Access
- SHEQ Policy
- Social Media Policy

This code of conduct sets out the behavioural expectations Olleco has of every individual in the organisation.

I am signing to confirm that I fully understand and accept the terms of the Olleco Code of Conduct in their entirety and agree to abide by the requirements set within the code and the associated policies and documents.

Name .....

Signature .....

Date .....