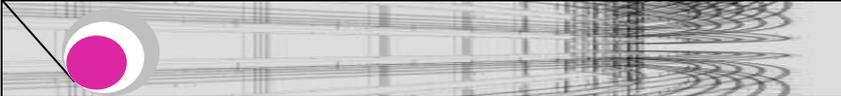


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| 'Providing you with the home that you need.' | Business Ethics, Standards And Conduct | Control ID | TPP ID P 100006 |
| | | Effective Date | 30 th December 2009 |
|  | | Revision Date | Annually |
| | | Revision Number | 1 |
| | | Approved By | <i>P. Woodcock</i> |

The Company operates in a complex contractual world linking Statutory Bodies and national and regional organisations with all aspects of the householder community. It is imperative that the Company's work is considered to be beyond any inference of improper influence and suggestion, to maintain the important role it fulfils. It is critical that all staff pay high regard to this policy and work within its guidance to prevent the loss of any contract, employment, monetary income and reputation that the Organisation maintains, or any change in corporate culture. Such is the seriousness of this policy that all breaches may result in disciplinary action, including, where appropriate dismissal.

CODE OF CONDUCT AND ETHICS OVERVIEW

Due to the special position that the Company holds it is liable *and* its staff to come under intense scrutiny. Contractual detailed obligations define a great deal of the Company's obligations and as such each employee's commitment to high levels of personal and business conduct become crucial in maintaining market position. Within the framework detailed below the information has been offered in as a light a means as is possible. Should any staff member have any questions relating to this matter they should contact their line manager who will be happy to assist or refer to any related more extensive policy.

CONSTRUCTION, ADAPTATION AND MAINTENANCE CODE OF CONDUCT

All Company employees who are involved in building and maintenance roles are required to follow the duties and requirements given below in addition to embracing the wider business conduct definitions:

1. **Clear Information And Transparent Proposal Of Services**
All clients and community members involved in a particular task or project must be given clear information about the nature, extent, cost and payment method. All workmanship, materials (which must be fit for purpose and of the appropriate and agreed quality levels) and appearance involved must be agreed prior to the commencement of work. All tasks of this nature will be underpinned with appropriate written or digital contracts or agreements.
2. **Timetables And Completion Dates**
All staff must work to achieve any defined completion dates agreed with the contracting party. Clients will also need to be kept fully aware of any alterations to timetables and explanations for changes should always be given.
3. **Comply With Legal Requirements**
All employees will work in accordance with any relevant statutory requirements that may apply to the tasks undertaken.
4. **Competent And Responsible Working**
All employees must carry out work to the defined relevant standards. In order to meet this criterion the employee must be confident of his or her ability to do the work. All employees shall act in a courteous manner and respect the privacy and property of the client or householder.
5. **Health And Safety**
All staff must ensure that work is carried out with due care and attention to policy, risk assessments and method statements to avoid causing danger and unreasonable nuisance, with all concerns reported to management.
6. **Maintaining Competency And Knowledge**
All staff are expected to keep up to date with construction and maintenance practices appropriate to their role, and attend any training courses offered by the Company.
7. **Responsibility For Sub-Contractors, Agents And Advisers (See 'Sub Contracting Policy' For Further Details)**
The employees in the Company responsible for bringing in external agencies must accept responsibility for the actions of these external parties and work to ensure that the Company's conduct requirements are adopted by these partners.
8. **Seek Client And Community Satisfaction**
The total organisation views the satisfaction of the customer as the hub of all operations. All employees must pay due regard to this goal. Should a client or neighbourhood be unhappy with the services of the Company, each required employee will fully participate in any defined complaints process.
9. **Upholding Professional Standards**
Any professional body joined by the Company will be recognised by all employees. Each staff member will work in the spirit of the guidance and obligations required as part of Company membership.

10. **Contracted Work Time**
Employees are required to work all of their defined contracted hours. The effective and efficient use of work time is considered a key element in ensuring the future success of the Company for all employees. Abuse of work time is considered a very serious matter as it lets down the whole team, fellow work colleagues and the client.

BUSINESS CONDUCT

1. **Business Praise**
It is an understanding that the expansion and success of the Company will benefit all employees, and it is in each staff member's interest to work towards the Business' greater success. In all dealings staff will be expected to speak positively about the Company, without overstating its capabilities.
2. **Client Contact**
The clients and householders of the service are seen as the heart of operations. It is expected that those in client facing roles will actively work to enhance these relationships in every dealing; should a client be one requiring only periodic contact, these staff members will ensure that quality alliances are maintained through devoting time to client contact each month and inviting clients to view the current projects that are being worked on. Likewise all appointments will be attended at the agreed time and telephones will be answered with the name of the Company and a desire to help.
3. **Industry Participation**
The Company sees itself as part of a wider network. All staff are encouraged to participate in industry wide networking and liaison.
4. **Bids And Proposals**
All tenders, bids and proposals will be submitted, as far as is reasonable, with time to spare. Such conduct will ensure that competency and professional standards are maintained.
5. **Money Laundering**
All employees have a legal obligation to report knowledge or suspicion of money laundering.
6. **Indemnity And Notification Requirements**
The Company will indemnify any employee against any liability that they might incur in connection with claims or proceedings brought against them in relation to anything done or not done when working for the Company. The indemnity will not extend to any liability where the staff member's acts or omissions are clearly done to be in 'bad faith' or are outside or inconsistent with the person's roles, responsibilities and job description. The liability will be conditional upon certain requirements being maintained which include telling a line manager as soon as an employee becomes aware of a claim. Further requirements will be explained to the employee should these circumstances become apparent.
7. **Confidentiality**
Staff are required to observe absolute confidentiality in their dealings (please see the Company's 'Confidentiality And Copyright' Policy for further details.)
8. **Ordering Goods And Services**
All goods and services will be ordered using a purchase order form. Suppliers should be asked to quote the purchase order number on any invoice submitted. The Finance Department will offer advice and support on this matter.
9. **References**
No staff member may give references for any current or ex-employee, whether in the Company's name or otherwise. All requests for references must be directed to the Managing Director who will delegate responsibility as seen as fit. All requests for financial references must also be addressed to the Managing Director.
10. **Gifts And Hospitality**
Under no circumstances will staff directly or indirectly offer, pay, accept or request any form of bribery or improper inducement.
11. **Exclusive Employment**
Whilst employed by the Company employees are not permitted to undertake any additional employment, whether directly or indirectly, accept with the written approval of the Managing Director. Agreement will not be given where potential conflicts of interest exist. On joining the Company the staff member must disclose any external appointment, employment or business interest. If a staff member already has other employment or is considering any additional employment they must notify the Company so that implications arising from the current working time legislation can be discussed as well as other matters of concern.

12. **Personal Information And Notification**
Staff must notify the Company of any change of name, address, telephone number, marital status etc., so that the maintenance of accurate information on records occurs, and managers are able to make contact with the individual in an emergency, and if necessary, outside normal working hours.

In order to comply with statutory duties, the Company needs to know any changes in personal circumstances, which affect or could affect a person's employment with the Company. An employee must notify their line manager with any changes in health so that, if necessary, so that the organisation can comply with any appropriate regulation. Persons employed are also obliged to inform their line manager if they become disqualified from driving or are involved in any other civil or criminal case (including County Court judgements.) Any such information will be treated in confidence but the Company reserves the right to disclose the matter to relevant management personnel and Company advisors.
13. **Financial Difficulties**
It is expected that all employees manage their finances in a responsible manner; however the Company does recognise that unexpected circumstances can occur which cause difficulty or hardship. Should an employee find himself or herself in such a position they must discuss the matter with their line manager. Whilst information will be treated in the strictest of confidence the Company reserves the right to inform other senior personnel where it is reasonable to do so, in order to help find a solution for the employee in question.
14. **Employment Of Relatives Or Other Individuals Where There Is A Close Relationship**
The Company does not prevent the relatives or other individuals with whom there is a close relationship to an employee from working in the organisation. It is each staff member's responsibility to inform their line manager of such a relationship when an application for employment is logged by their relative etc. The Company will make every effort to ensure that no conflict of interest arises. T.P Properties (TPP) does not normally allow those who have a close relationship to work in the same team or report to the same manager.
15. **Client Relations**
The Company is involved in the provision of services to clients and some of employees are employed to perform work on behalf of those clients, sometimes on the client's own premises. Due to the nature of this relationship, the Company's clients may, on rare occasions, require that an employee be removed from a job in accordance with their contract. In such circumstances the Company will investigate the reasons for such requests. However, if the client maintains their stance the Company will then take all reasonable steps to ensure that alternative work is provided for the employee in question. If this is not possible TPP may have no alternative but to terminate such an individual's employment. This procedure is separate from any concurrent disciplinary matter that may need to be addressed.
16. **Colleague Relations**
The Company views itself as a 'team', with each facet being important in contributing to the success for all. It is considered fundamental that all employees will at all times behave in a friendly, civil, respectful and sensible manner towards their work colleagues, employees of a venue, sub-contractors and any other person they encounter.
17. **Neighbour Relations**
Staff are to pay particular regard to the needs of the neighbourhood within which they may operate. Careful consideration should be paid to matters such as parking, noise, rubbish and smoking to name but a few. Whether a worker is in a work site or on the street they are to view themselves as on Company business and therefore conduct themselves in an appropriate manner. Staff are to recognise that complaints are as equally likely from neighbours as they are from clients. Should a staff member be found to be acting in an unprofessional manner whilst in a community the matter will be considered very serious.

WASTAGE

1. The Company maintains a policy of 'minimum waste', which is essential to the cost-effective and efficient running of the organisation. All staff are able to promote this policy by taking extra care during their normal duties by avoiding unnecessary or extravagant use of services, time, energy, etc. The following points are illustrations of this:
 - a. Handle machines, equipment and stock with care;
 - b. Only order what stock or equipment is required to complete a task or contract, returning all unused material to any supplier as is possible or to the office stores;
 - c. Re-use stock or equipment that has been over-ordered;
 - d. Turn off any unnecessary lighting and heating. Keep doors closed whenever possible;
 - e. Ask for other work if a job has come to a standstill; and,
 - f. Start with the minimum of delay after arriving for work and after breaks.
2. The following provisions are express written terms of an individual's contract of employment:
 - a. Any damage to vehicles, stock or property (including non-statutory safety equipment and damage caused in the event of a party or celebration) that is the result of their carelessness, negligence or deliberate vandalism will render the employee liable to pay the full or part of the cost of repair or replacement.
 - b. Any loss to the Company that is the result of an employee's failure to observe rules, procedures or instruction, or is as a result of their negligent behaviour or unsatisfactory standards of work will render them liable to reimburse to TPP the full or part of the cost of the loss.
 - c. In the event of an at fault accident whilst driving one of the Company's vehicles, the driver may be required to pay the cost of the insurance excess as defined in the 'Driving Policy'.

In the event of failure to pay, the Company has the contractual right to deduct such costs from pay.

STANDARDS OF DRESS

As all staff are liable to come into contact with customers and members of the public, it is important that they present a professional image with regards to appearance and standards of dress. Employees are required to be neat and tidy at all times. Staff must wear any uniform and personal protective equipment (PPE) that is provided, and wear it all times whilst at work (as defined by policy, risk assessment and method statement in respect of PPE), laundering it on a regular basis or keeping it clean and stored safely. Where uniform is not provided, staff should wear clothes appropriate to their job responsibilities being fit for purpose, and they should be kept clean and tidy at all times. While each non-uniformed staff member has discretion on what is considered suitable dress, line managers retain responsibility for interpretation and application of this.

If an office member of staff is asked to visit an area that is potentially unsafe and not associated with business dress, it may be considered appropriate to 'dress down' if this would make the employee less conspicuous and safer. It may also be considered appropriate to carry any laptops in alternative bags so as not to allow them to be easily recognisable and a subject of theft.

HOUSEKEEPING AND REFRESHMENT MAKING FACILITIES

Both from the point of view of safety and of appearance, work areas must be kept clean and tidy at all times. It is the duty of all employees to keep their area of work clean and participate in housekeeping duties. The Company provides refreshment-making facilities in the office for all employee's use, which must be kept clean and tidy at all times. It is important that all employees observe any site rules in relation to welfare facilities.

GENERAL TERMS OR EMPLOYMENT, INFORMATION AND PROCEDURES

1. **Time Off**
Circumstances may arise where an employee needs time off for medical/dental appointments, or for other reasons. Where possible, such appointments should be made outside normal working hours. If this is not possible, time off required for these purposes may be granted at the prior discretion of the staff member's line manager and will normally be without pay. Staff should make such a request with the maximum of time given to allow for work planning.
2. **Bereavement Leave**
Reactions to bereavement may vary greatly according to individual circumstances, the setting of fixed rules for time off is therefore inappropriate. Staff should discuss their circumstances with their Line Manager and agree appropriate time off and whether this is with or without pay.
3. **Safety (Please see related Health and Safety policies for greater explanation)**
Staff should make themselves familiar with the Company's Health and Safety Policy, related procedures, method statements, risk assessments and their own health and safety duties and responsibilities, as shown separately in the Health and Safety Systems. Staff must not take any action that could threaten the health or safety of themselves, other employees, customers or members of the public. The Company will expect protective clothing and other equipment, which may be issued for an employee's protection, will be worn and used at all appropriate times. Failure to do so could be a contravention of a staff member's health and safety responsibilities. Once issued, this protective wear/equipment is the employee's responsibility. In addition, staff must report all accidents and injuries at work, no matter how minor, in the accident book that can be found in the office. Finally, employees must ensure that they are aware of the Company's fire and evacuation procedures and the action taken in the event of such an emergency.
5. **Travel Expenses And Personal Mileage**
The Company will reimburse staff for any reasonable expenses incurred whilst travelling on business. Employees must provide receipts for any expenditure and complete a 'Mileage And Expenses Form'. This form must include details of the journey and its reason, and is submitted to the Managing Director for authorisation. Payments will be made in line with four weekly payment methods. Staff will be charged 40 pence per mile where the Company's vehicles are used for personal use and the amount will be deducted from the driver's wages, this is an express written term of an employee's contract of employment.
6. **Employee's Property And Lost Property**
The Company does not accept liability for any loss of, or damage to, property that a member of staff brings onto the premises. Staff are requested not to bring personal items of value onto the premises, to building and maintenance areas and, in particular, not to leave any items overnight in any workplace or vehicle. Articles of lost property should be handed to an employee's line manager who will retain them whilst attempts are made to discover the owner.
7. **Parking**
Where parking facilities have been made available to a staff member on Company premises they must ensure that they observe all of the Company's traffic requirements e.g. speed limits, etc. To avoid congestion, all vehicles must be parked only in the designated parking areas. Employees who are working in building and maintenance projects must park according to the rules of the Highway and with due consideration to the health and safety aspects of the site and to others who reside in that community or setting. No liability is accepted for damage to private vehicles, however caused.
8. **Mail**
All mail received by the Company will be opened, including that addressed to employees. Private mail, therefore, should not be sent care of any business or site worked address. No private mail may be posted at the Company's expense except in those cases where a formal re-charge arrangement has been made.
9. **Friends And Relatives Contact, Telephone Calls And Mobile Phones**
Staff should discourage their friends and relatives from either calling in person or by telephone except in an emergency. Incoming personal telephone calls are allowed only in the case of emergency. Outgoing personal calls can only be made with prior permission. Personal mobile phones should only be used in an emergency during working hours. Where Company mobile phones are issued these are for business purposes only and must not be abused.

It is illegal to use a mobile phone without a hands-free set whilst driving. It is the Company's policy that an employee should not use any mobile phone whilst driving. All staff should pull over safely to the side of the road in an appropriate place before making or receiving any telephone calls. In the event of being unable to pick up a call because the employee cannot find a safe place to park, they must return the call as soon as conveniently possible. Further details are available in policies relating to driving, mobile phone use and confidentiality.

All mobile telephones provided by the Company to an employee for business use, must be used for the sole purpose. Any personal calls will be recharged to the staff member concerned. Telephones must be safely stored at all times (i.e. out of the view of the public when in a vehicle), and held on the person at times as defined by their contract, job description or job operation. It is the employee's responsibility to ensure that telephones are adequately charged at all times, failure to do so could severely hinder the professional execution of tasks, incurring greater costs, which hinders the success of the business for all. When answering an on-call telephone and such like, the employee is to answer with the name T.P Properties and how they can offer their help; courtesy is to be shown in all dealings.

10. **Buying Or Selling Of Goods**
Staff are not allowed to buy or sell goods on their own behalf on Company premises or during their working hours.
11. **Collections From Employees**
Unless the Managing Director gives specific authorisation, no collections of any kind are allowed on Company premises or in the name of the Company.