



POLICY

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BITC Code of Conduct

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The Purpose of the Code

BITC have a vision that every business will be a responsible business delivering social, environmental and economic sustainability. Our behavior, culture and values are essential to and at the very core of this mission. We strive to ensure that what we do internally is aligned to the asks that we make of our members. It is in this spirit that the BITC code of conduct has been created. The BITC Code of Conduct sets a framework for how we must operate to protect the interests of members, stakeholders, customers, employees, and suppliers. The Code of Conduct does not aim to address every situation but is designed as a statement to values, culture, behaviours and ways of working that are central to the BITC way.

For further information on the points raised in our Code of Conduct and on our policies, refer to our Handbook and the policies on HRNet. BITC reserves the right to amend and update the code of conduct when required.

Who does the code of conduct apply to?

All of us whether we are part of, or working with, the Business in the Community group of charities and companies, are bound by the BITC code of conduct. We expect all BITC employees to know and work to the BITC code of conduct. We expect all contactors, consultants or service provider to follow the code, code violations may result in a termination of contract or relationship with BITC.

The Code of Conduct Check

If you have any doubts about how to interpret this code, please discuss with your line manager or HR.

Code Violations

If you breach the BITC Code of Conduct you may face disciplinary action (including dismissal) and, in serious cases, legal action may be taken against you.

Speak up – raise a concern or ask a question

We foster an 'open door' culture at BITC, speaking up is crucial to our culture and our long-term results. Speaking up when something does not seem right or if you suspect a violation in the code of conduct, demonstrates our integrity and shows we have the courage to do the right thing.

Most concerns are likely to be dealt with properly and effectively in the first instance through internal procedures:

You may raise your concern with your line manager or, if you feel it is more appropriate to do so, with one of the two BITC staff nominated for this purpose:

- Finance Director 0207 566 8684
- HR Director 0207 566 8752

Alternatively, if you feel a degree of external involvement may be needed in the circumstances (for example, that the BITC nominated staff may be implicated or face a conflict of interest in investigating the allegation), you may contact John Neill, Chairman & Group Chief Executive of the Unipart Group, and Chairman of BITC's Audit Committee on 01865 383028. His PA is Lucy Clarke and she can be emailed on lucy.clarke@unipart.com

BITC prohibits any retaliation against any employee that speaks out when something does not feel right. Refer to the BITC Whistle Blowing Policy and Procedure for further information and detail.





How We Behave

Professional behaviour

Business in the Community is a good corporate citizen and complies with not only the letter, but with the spirit of the law wherever we do business. Please do read our code of conduct and follow both the letter and the spirit of the code. We set the bar high in responsible business and we expect your conduct to echo this.

Legal Compliance

You must carry out your work according to the spirit as well as the letter of the law.

During your time with Business in the Community, you will be required to undertake mandatory induction and training to ensure you are fully aware of your legal, ethical and operational responsibilities. You must complete this training, including any assessments, to the required standard and within the deadlines set by the organisation

Integrity

Integrity is doing the right thing even if no one is watching

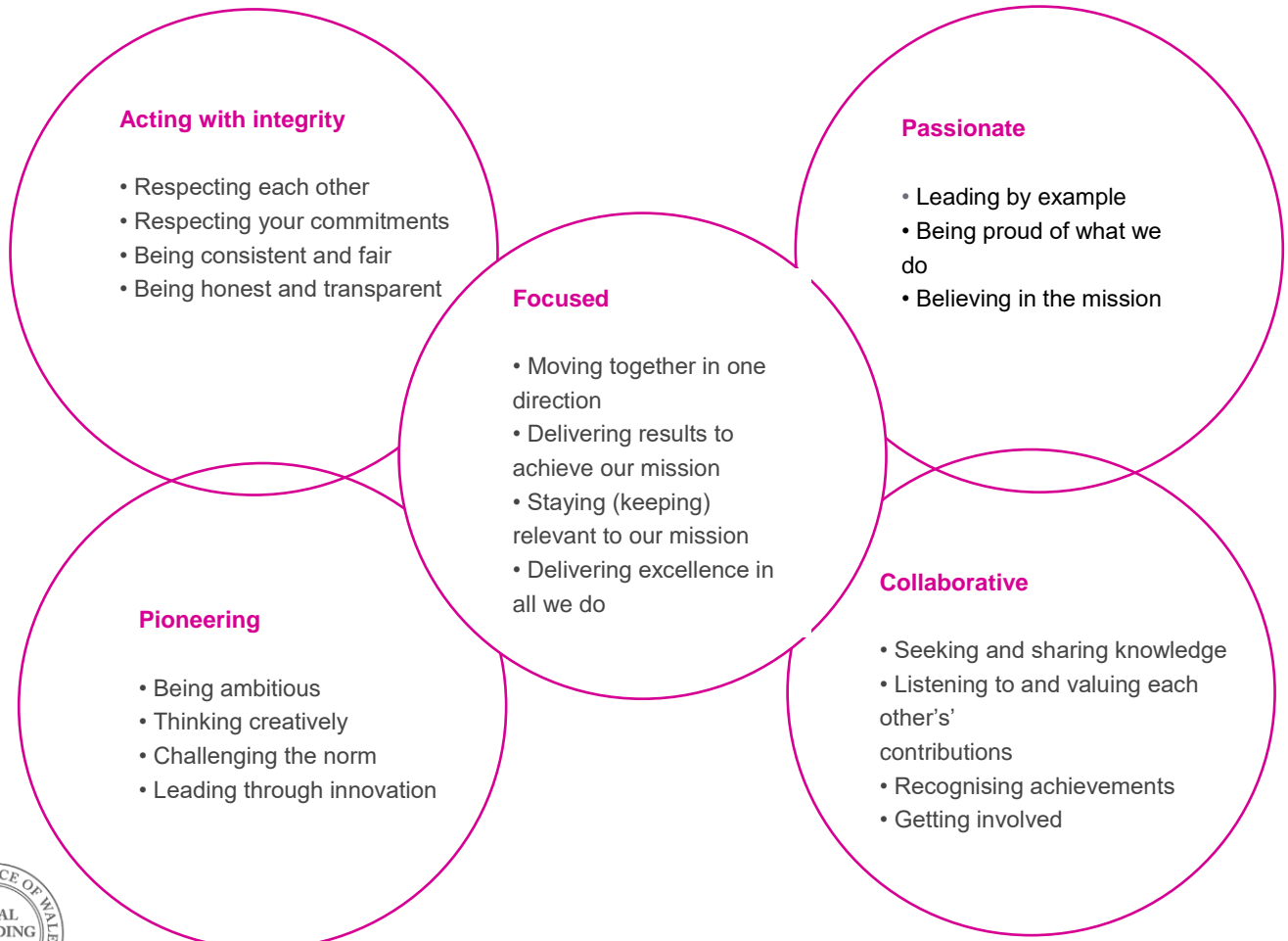
You must always:

Act in the best interests of Business in the Community.

Respect customers and treat them courteously and consistently.

Respect colleagues and treat them fairly, openly and honestly.

Our Values





Conflict of interest

Conflicts of interest can arise if you have a personal interest in a business decision involving Business in the Community. Examples of conflict of interests where you have an involvement with the other party include; a family relationship; a business/ commercial/ financial relationship; a romantic/ sexual relationship; a volunteering relationship e.g. trustee. Personal interest can be direct or indirect and encompasses not only your interests but those of your family and friends. Avoid situations in which your personal interests could conflict with those of Business in the Community. If there is a potential conflict of interest, Business in the Community's interests must always take priority. If you have a conflict of interest or a potential conflict of interest you must disclose this to Human Resources and your Manager in writing.

You may also have a conflict of interest if you sit on the Board – in either a legal or an advisory capacity – of a voluntary organisation, a partner organisation or a foundation or sub-committee/working group of a member company. You may find yourself being involved in a decision to award funding from BITC to the voluntary organisation or funding to BITC from the member company. You must immediately declare a conflict of interest at the start of the discussion and abstain from the decision.

Relationships and conflict of interest

Business in the Community respects all its employees right to a private life, but we need to protect business interests and the integrity of the organisation.

Workplace relationships are common but if you are in a personal relationship with someone who directly manages you, this will be considered a conflict of interest. Likewise, if you are in a relationship with someone you manage there will be a serious conflict of interest and there is a risk that accusations of unfair advantage may arise. This may also be an issue if you are in a relationship with a colleague who is not in your direct management line.

It is your responsibility to act with integrity and transparency and declare the relationship, in confidence, to your HR Business Partner or Adviser. By doing so we can consider an alternative management arrangement e.g. a change in reporting line, to ensure we mitigate risks of unfair treatment and reputational damage.

In some circumstances, failure to declare a conflict of interest due to a relationship may result in disciplinary action.

Outside Activities

If you are invited to serve in any capacity (as director, partner, trustee, employee, consultant, agent etc.) - whether paid or unpaid - in any other charity, company or business, and the invitation is directly or indirectly connected to your employment at Business in the Community, you should seek the permission of the relevant Executive Team member to whom you report or ultimately report, and you must inform the HR Director. Permission will not be unreasonably withheld.

Business in the Community recognises that school governors are an invaluable part of our education system. As part of its overall commitment to employee volunteering and community engagement, we encourage





employees to become school governors as set out in our employee volunteering charities. You should register that you are a school governor with the HR department.

Business in the Community also recognises that much benefit can be obtained from being a trustee of a charity. You must register that you are a trustee with the Human Resources department via HR.Net.

Gifts and Entertainment

Gifts and entertainment should not be given or received if they could be interpreted as creating an obligation; that your impartiality could be affected, or the gifts or entertainment could be perceived to influence a business decision. You may accept items of small value, such as promotional pens or coasters, chocolates, bottles of wine. Any more substantial gifts should be donated to charity. Reasonable offers of entertainment such as dinner, theatre parties or sporting events may be accepted or offered. In determining what is "reasonable" the onus is on you to consider not only the value of the gift or entertainment, but the frequency with which they are offered, and the circumstances in which they are offered. If in doubt, ask the Finance Team.

Politics

While you are all entitled to personal political views and activities, Business in the Community has a policy of strict political neutrality. You should not take part in a political event as a representative of Business in the Community without the express permission of the Chief Executive. If you plan to run for public office, for example as a local councillor, you must seek permission from the Chief Executive.

Bribery and Corruption

The organisation will not tolerate any form of bribery by, or of, its employees, workers, agents or consultants or any person or body acting on its behalf. For further detail, please refer to the Bribery policy on HR Net.

Records and Reports

Any information that you record and report must comply with financial, accounting, data protection and safeguarding policies and procedures.

Fraud

Business in the Community takes a very serious view of any attempt to commit fraud by members of staff, contractors or anyone acting on our behalf. We require staff at all times to act in line with our core values and with the BITC code of conduct - in particular to act with honesty and integrity and to safeguard resources for which they are responsible. We are all responsible for being vigilant in preventing the circumstances in which fraud can be perpetrated or covered up.

Please refer to BITC Anti-Fraud policy on HR Net.

Safety and Security

It is the policy of Business in the Community to maintain safe and healthy working conditions. You must follow out Health and Safety procedures that apply to the area where you work. Please refer to Health and Safety policy on HR Net. We do not tolerate any level of violence or threat in the workplace. This would be investigated by the Business in the Community and may lead to disciplinary action and possible reporting to the Police.





Safeguarding

Business in the Community is committed to, and has a duty to, safeguard and promote the welfare of the children, young people and adults at risk who use its services or with whom it comes into contact. The Safeguarding Framework aims to make clear what staff and volunteers must do when they have identified concerns with regards to a child, young person or adult who may be at risk of abuse. You must never hesitate any report any incidents or concerns you may have about this area of work. Please refer to the BITC Safeguarding Policy and Framework on HRnet.

Drugs and Alcohol

Business in the Community prohibits the drinking of alcohol by employees, contractors, consultants, interns and other workers in the workplace or on Business in the Community business other than reasonable drinking of alcohol in connection with approved business and social functions. See the dependency policy on HR Net for further information.

Business in the Community expressly prohibits the use of any illegal drugs or any prescription drugs that have not been prescribed for the user. It is a criminal offence to be in possession of, use or distribute an illicit substance. If any such incidents take place on company premises, in company vehicles or at a company function, they will be regarded as serious. They will be investigated by the Business in the Community, and may lead to disciplinary action and possible reporting to the Police. See the Alcohol and Drug dependency policy on HR Net for further information.

Suppliers

You must select vendors/suppliers on quality, corporate social responsibility, service and cost only.

Company Equipment

BITC provide tools and equipment such as smartphones and laptops to employees that require the use regularly as part of their roles. All personal usage must be kept to a minimum. At the end of your employment with BITC you must return your mobile phone to the Facilities Team in London and your Laptop to the IT team. You must not transfer your mobile device or laptop to someone else in your team to reuse, nor may you give it to your successor or line-manager. You will be liable for the replacement cost of equipment that you fail to return.

For further detail refer to the mobile equipment and laptop policy on HR Net.

Intellectual Property

You must respect all copyright and intellectual property laws. Anything you write in your capacity as an employee of Business in the Community regarding responsible business and is published either online and/or hard copy is the property and copyright of Business in the Community and you waive all rights to the IP. You also agree to abide by Intellectual Property laws in relation to suppliers. For further detail refer to 'using consultants' on HR Net and your contract of employment.

Confidentiality and Privacy

During the course of your work you may learn confidential and/or personal information about Business in the Community, its members, stakeholders, customers, employees, and suppliers. Unless you have express





permission, you must not disclose or discuss any such information while employed by or after you leave Business in the Community.

In particular, you must treat as confidential all information given to Business in the Community by members unless permission has been given by the member for use for example, in case studies or published research.

IT and Data Protection

You must observe the requirements of all relevant data protection legislation, for example you must not provide contact information for colleagues, people who work for our member companies or member details to any other member company or to partner organisations without permission from the individual or member or partner organisation.

All work performed in the course of your employment with Business in the Community belongs to the company.

You must protect and respect the privacy and security of data and follow all applicable data protection laws. BITC outlines the organisational policy on IT and Data including data protection, confidentiality, security, legal and reputational in the IT and Data Protection policy. This must be followed at all times and can be obtained on HR Net.

How we treat each other

Respect at Work

Harassment, discrimination and bullying of any kind will not be tolerated at work, at work-related functions or social events or on client premises. Please refer to the Respect at Work policy on HR Net.

Equal Opportunity

Business in the Community is an equal opportunities employer and expects you to treat your colleagues fairly and free from discrimination in all interactions and decisions regarding them.

Reviewed August 2018

