

KINDLING\*

# CODE OF CONDUCT

Last Reviewed: September 2023

## Introduction

Kindling Strategy strives to maintain an environment for its people in which honesty, integrity and respect for fellow members of staff, participants, clients and contractors is consistently reflected in personal behaviour and standards of conduct. The purpose of this Code is to provide clear guidance as to how people who represent Kindling Strategy are expected to conduct themselves.

This Code covers some of the most important issues relating to personal conduct and gives a framework for standards and behaviours but is not intended to be exhaustive. You should ensure that you are familiar with the specific policies that underpin these standards and behaviours by referring to the documents highlighted as set out in the “Required Reading” section. In addition, this Code of Conduct should be read in conjunction with:

- Your Statement of Terms and Conditions of Employment (where appropriate),
- Kindling Strategy’s staff handbook, policies and procedures,

If you are unsure of the standards and behaviours expected of you, guidance should be sought from Jon Cohen.

## Scope

This policy applies to Employees, Contractors, Associates and Directors, any other persons supporting, providing or delivering services for or on behalf of Kindling Strategy (referred to as “staff” for the purposes of this Code).

## Standards of Personal Behaviour and Conduct

### General obligations

- You must perform your duties with honesty, integrity and impartiality and act in the best interests of Kindling Strategy, its clients and participants.
- You must comply with laws and be accountable for your actions and conduct and act with a high standard of integrity, commitment and courtesy. You must not conduct yourself in a manner which could reasonably be regarded as bringing Kindling Strategy into dispute (this includes involvement in activities that are inconsistent with Kindling Strategy and could lead to reputational damage).
- When representing Kindling Strategy, you must uphold and promote Kindling Strategy’s values, objectives and policies. You must not engage in any political or campaigning activity that might compromise the Kindling Strategy’s position or reputation.
- You should always be reliable and punctual.
- You must ensure that Kindling Strategy funds and resources that are entrusted to you are used efficiently, economically and effectively and take reasonable steps to protect Kindling Strategy funds, resources, property and assets from theft, damage and misuse. This includes complying with any procedures for securing value for money and fairness in decision making.
- You are expected to provide the highest possible standard of service to clients and participants.
- You are prepared to participate in learning and development so that your skills and knowledge up to date and relevant to the duties that you are undertaking.
- You should bring to the attention of management any deficiency in the provision of service and must report any impropriety or breach of procedure.

## Respect for others

Equality and diversity issues affect every area of our work. All participants, clients, staff and suppliers have the right to be treated with fairness, dignity and equality regardless of their backgrounds. You must therefore promote equality and diversity by not discriminating unlawfully against any person and by treating them with respect, regardless of their age, gender, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage & civil partnership, pregnancy & maternity.

Kindling Strategy is committed to ensuring that everyone is able to work in an environment without fear of harassment, bullying or intimidation and you must ensure that your behaviour whether intentional or unintentional, does not constitute harassment. Kindling Strategy will take action against inappropriate behaviour which shows a lack of respect for others, or which leads to people feeling threatened.

You must not victimise another member of staff who has, or intends to report, or is suspected of an act of impropriety or other misconduct

## Professional behaviour

In your official or private capacity, you must not conduct yourself in such a manner which could reasonably be regarded as bringing Kindling Strategy into disrepute. You must maintain proper and appropriate professional boundaries in the course of your work and how you interact with participants, clients and those you come into contact with. The maintenance of professional boundaries is essential to maintaining the Kindling Strategy's good reputation.

## Criminal actions

You must inform Jon Cohen soon as practicable if you are convicted of a criminal offence or receive a caution, reprimand or warning, or if you are subject to proceedings or investigation. This does not apply to traffic offences unless your role requires you to drive for work or the possible penalty includes imprisonment or disqualification from driving or involves Kindling Strategy. Depending on the circumstances, this may have a bearing on an individual's ability to work for Kindling Strategy. However, each case will be considered on its merits.

## Personal interests

In your official or personal capacity, you must not allow your personal interests to conflict with Kindling Strategy's requirements or use your position improperly to give an advantage or disadvantage on any person. You must take all reasonable steps to ensure that conflicts of interest are declared and review this on an ongoing basis.

## Declaration of financial and other interests

You must comply with the requirements of Kindling Strategy. Failure to make a relevant declaration of interests is a very serious breach of trust. If you are in doubt about a declaration, you are advised to take advice from Jon Cohen. If you have any external business or professional interest which might potentially be seen as providing a conflict of interest with your role at Kindling Strategy, you must disclose this to Jon Cohen at the first opportunity. You are also required to declare any financial interest, whether direct or indirect, in any existing or proposed client contract.

## Hospitality and/or inducements

Gifts or hospitality offered to Kindling Strategy staff are not intended to influence decisions about how Kindling Strategy assesses performance or awards future business. Any Hospitality or gifts received should be legitimate, proportionate and respectful of Kindling Strategy's internal policies. You should refuse all material hospitality and gifts offered by an individual or company that does or could provide services to Kindling Strategy where they are offered as an inducement to secure favour.

## Additional work

With regard to off-duty hours, they are your personal concern, but you must not put yourself in a position where your role at Kindling Strategy and private interests conflict. Kindling Strategy would not wish to

unreasonably preclude its staff from undertaking additional work unless that work breaches employment legislation (e.g. the Working Time Directive), conflicts with or detrimentally affects Kindling Strategy.

## Work-related social events

You should also be aware that in certain circumstances out of work activities such as leaving parties or other social events may be regarded as an extension of your employment with Kindling Strategy. You are therefore expected to behave appropriately so that everyone can enjoy themselves without fear of being made to feel uncomfortable by your conduct. Any inappropriate behaviour or actions during such events could lead to disciplinary action, up to and including summary dismissal.

## Health and safety

You must adhere to Kindling Strategy's Health and Safety policies, procedures and guidance along with any other training. You must ensure that you take every action to keep yourself and others within the work environment safe and well. This will include:

- carrying out your work in accordance with the health and safety policy;
- taking good care of your own health and safety as well as the safety of others who may be affected by work undertaken;
- not intentionally or recklessly interfering with or misusing anything provided for the purpose of health and safety at work;
- using equipment in a safe manner and only when trained in the use of that particular equipment;
- participating in the completion of risk assessments;
- notifying your manager of:
  - any equipment which may be damaged or not fit for purpose;
  - any accident or incident, reporting either as the injured party or as a witness to the event;
  - any working systems which may be inappropriate;
  - any 'near miss' events or dangerous occurrence which may have caused injury or damage.

## Standards of dress and appearance

You are required to dress in a manner that is suitable and appropriate to Kindling Strategy's business and your duties and responsibilities ensuring a professional appearance in the workplace.

## Use of alcohol or illegal drugs and substances

The taking of illegal drugs and recreational drugs (including "legal highs / psychoactive substances") during working hours is unacceptable and will not be tolerated. You are expected to attend work without being under the influence of alcohol or illegal/recreational drugs and without your performance being adversely impacted by the consumption of alcohol or illegal/recreational drugs. No alcohol or drugs (which could be intended to be misused or abused) should be consumed during working hours. You must never drink alcohol or take drugs if you are required to drive private vehicles on Kindling Strategy business.

We recognise that, for a number of reasons, some people could develop alcohol or drug related problems or use drugs for recreational purposes. It is our intention to deal constructively and sympathetically with an individual's alcohol or drug related problem, such as alcohol or drug dependency. If you have an alcohol or drug problem, you should always seek appropriate help.

## Use of Kindling Strategy's PC's, Email, Internet, social media and telephone communications

All IT systems/equipment and use of telephones (including mobiles), Internet access and Email are provided for business use. You should guard your unique password carefully; you must not give your password to any

other person. You are responsible for using Kindling Strategy's PCs, Email, Internet and telephone facilities in a responsible manner. You must not use these inappropriately or for any other purpose which might bring Kindling Strategy into disrepute.

You may use Kindling Strategy's Internet facilities for occasional personal matters during non-working hours, but you must not access social media via Kindling Strategy's Internet facilities for personal purposes at any time unless authorised to do so and it being in connection with your duties (eg. marketing etc).

Inappropriate use of email and internet systems also includes viewing, publishing or circulating illegal or offensive materials, publications or junk mail, including chain letters, jokes or attachments, gambling or gaming (this list is not exhaustive). These will be treated as disciplinary matters.

Kindling Strategy has the right to monitor emails, phone calls, internet activity or document production, principally in order to avoid offensive or nuisance material and to protect systems from viruses, but also to ensure proper and effective use of systems by staff. You should be aware that Kindling Strategy has the right to access personal email and computer files if required for investigation of misuse.

## Confidentiality and disclosure of information

The rights of individuals regarding their personal information are legally protected and guidance is provided in the data Protection Policy. In the course of your work, you may come into contact with or use confidential information about colleagues, participants, clients and suppliers, for example their names and contact information. If you collect personal data in the course of your duties, you have a responsibility to ensure that it is gathered, stored and used in accordance with the principles in the data protection legislation. If you are in any doubt about what you can or cannot disclose and to whom, do not disclose the personal information until you have sought further advice from Jon Cohen.

You should not talk to the Media or otherwise make public statements (this includes articles, letters, comments etc on social media such as Facebook, Twitter etc) on behalf of Kindling Strategy.

## Raising matters of concern

Individuals have a right and a duty to raise concerns which they may have about breaches of the law or propriety by Kindling Strategy. This should normally be made to Jon Cohen. No individual who expresses their views in good faith and in line with this guidance will be penalised for doing so. However, where it is shown that unfounded allegations have been made for malicious, frivolous or vexatious reasons, disciplinary action may be taken.

## Breaches of this code

This Code of Conduct has been drawn up to provide a source of guidance to Kindling Strategy's staff. It is not a contractual document and can be amended at any time by Kindling Strategy. All staff must comply with both the provisions of this Code and Kindling Strategy's policies and procedures. Breaches of which will be taken seriously and may result in disciplinary action up to and including dismissal, or lead to the suspension or termination of any relevant agreement, contract, sub-contract or other agreement/arrangement.