

# The way we work

## **Contents**

Introduction

Who is this Code for?

### **Our Code of Conduct**

1. We will do business in an open and transparent way, and prevent bribery and corruption
2. We will uphold all laws relevant to countering tax evasion, including the Criminal Finances Act 2017
3. We will avoid conflicts of interest, and follow strict rules for corporate gifts and entertainment
4. We will compete fairly and honestly
5. We will work safely, wherever we are
6. We will treat people with respect, and uphold our position of trust
7. We will be mindful of people's personal privacy and protect confidential information
8. We will act responsibly in the community, and in the interests of a sustainable environment
9. We will make sure you can always raise questions or concerns

Summary



**Nigel Howell**  
Chief Executive, FirstPort

Our vision sets out the commitments we have made to deliver excellent customer service. How we deliver those services is just as important. Ensuring we follow the highest standards of business practice is the only way we can secure the trust and confidence of everyone we deal with.

I want FirstPort to be a business that operates to the highest standards of integrity, honesty and transparency at all times. In delivering services to our customers, FirstPort relies on its suppliers as well as its own people, and it is important that everyone who represents us operates to these standards.

If you work for us, or on our behalf, you need to know what we expect of you and what you can expect from us. The purpose of this Code of Business Conduct is to make that clear and I expect everyone to follow it. There are more detailed policies that support the principles set out in this Code, but if you are unsure at any time what it means for you, please ask for advice.

By following this Code, together, we will ensure we are all proud to say that we work for FirstPort.

A handwritten signature in yellow ink that reads "Nigel Howell". The signature is written in a cursive style with a long horizontal stroke at the bottom.

**Nigel Howell**  
Chief Executive, FirstPort

## Who is this Code for?

---

This Code is for all of us – everyone who works at FirstPort and those who work with us and for us.

Whether you're an employee, a contractor or sub-contractor, or a supplier, we want you to do the right thing. This Code is designed to make sure that the work you do meets the highest standards of integrity and business ethics. It's also designed to help you comply with the laws and regulations applicable to our business.

We want managers to lead by example, and be role models for their teams. We want employees and suppliers to feel able to report problems and concerns so that we can continually learn and improve.

We want you to be aware of how your actions will affect others and how they might impact your reputation and FirstPort's. We want you to be proud of the decisions you make at work.

We're here to support you if you need it. If you're in any way unsure about something covered by this Code, ask for advice. You can find information on how to raise questions and concerns in section 9 of this document.

# 1. ■

## **We will do business in an open and transparent way, and prevent bribery and corruption**

---

We will not tolerate any underhand business practice in our own company, or from anyone who works with us or for us.

All our relationships must be founded on mutual respect, and on business practices that are fair, transparent and lawful. We make business decisions, award contracts and select suppliers on the basis of fair and objective criteria, such as good value and high levels of service.

In all our business dealings, we won't give or accept any sort of improper incentive, whether cash or in-kind. We won't offer or accept hidden commission payments or any type of bribe and this applies both to our own employees and to anyone who represents us or works on our behalf.

This is an area of business where it's important not just to do the right thing, but also to be seen to be doing it. That's why, if you suspect that a FirstPort employee or someone working on our behalf has behaved in an illegal or unethical way, you must report it at once.

### **A checklist for avoiding unacceptable business practices**

- Ensure everyone is treated fairly and equally when making decisions
- Be vigilant and observant – report any suspicion of improper behaviour at the earliest possible opportunity
- If you are in any doubt whether an improper offer or inducement has been made, politely stop the conversation and report it
- Be aware of how your behaviour might be interpreted – or misinterpreted – by others. We must always act with integrity and be seen to do so. Do not get involved in anything that could potentially be misconstrued, even if your intentions are good

# 2.

## We will uphold all laws relevant to countering tax evasion, including the Criminal Finances Act 2017

---

We take a zero-tolerance approach to the facilitation of tax evasion, whether under UK law or under the law of any foreign country.

Tax evasion facilitation means being knowingly concerned in, or taking steps with a view to, the fraudulent evasion of tax by another person, or aiding, abetting, counselling or procuring the commission of that offence.

The prevention, detection and reporting of tax evasion and foreign tax evasion are the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this.

We aim to operate at the highest standards of integrity, honesty and transparency and have a zero-tolerance for illegal and unethical conduct. We expect you to always maintain our high standards.

### **A checklist for avoiding tax evasion**

- Be vigilant and observant – report any suspicion of improper behavior at the earliest possible opportunity (this may be cash payments made by suppliers to their workers).
- Have in place the necessary risk assessments and audit processes throughout the supply chain.
- If in doubt ask for advice.



# 3.

## We will avoid conflicts of interest, and follow strict rules for corporate gifts and entertainment

We will ensure that decisions made at work are not influenced by personal relationships, and never result in improper personal benefit or gain.

Every decision you make must be made objectively and fairly, whether you are a FirstPort employee, or a supplier working on our behalf.

You should never decide on a course of action which results or appears to result in personal gain – either for you, your family or friends – or which otherwise compromises your impartiality. This would be a conflict of interest.

Accepting gifts and entertainment can also bring about conflicts of interest. That's why we don't allow our own people or those working on our behalf to accept inappropriate gifts or entertainment.

If you're not sure if an invitation or gift should be accepted, ask for advice. If you cannot get approval in time, it must be politely declined.

Always consider how making or accepting a gift or entertainment might be interpreted by someone outside the business, or an 'impartial observer'. Even if gifts or entertainment don't actually influence your decision-making, it's important that others wouldn't think that they have.

If you think you might have a conflict of interest, you must report it straight away.

### **A checklist for conflicts of interest, and gifts and entertainment**

- You must treat people fairly
- Don't accept any gift, favour or make any arrangement that has strings attached
- Don't take on other employment that could interfere or conflict with your role at FirstPort
- Don't try to influence the career prospects of any other FirstPort employee or a friend or family member
- Avoid any activity or situation that appears to create a conflict of interest, even if customers may think it's a good idea
- If in doubt, ask for advice

# 4.

## We will compete fairly and honestly

We believe that fair competition is the right way to do business.

Competing fairly and promoting open and honest competition amongst our suppliers is the right way to ensure value for customers.

You must avoid anything which could give rise to a risk of:

- agreeing with our competitors what price to charge for products or services – this is known as price fixing;
- colluding or conspiring with our competitors or others in relation to bids or contracts for goods/services with the result that our customers do not get the most competitive price or value; and
- inappropriate sharing of commercially sensitive information in relation to bids or the supply of goods or services.

All of this conduct is unlawful and may give rise to criminal as well as civil liability.

You should be open about when one of our Knight Square group companies is bidding for business from another company within our group, and they will be subject to the same procedure as any other bidder.

Conversations or actions don't have to be formally recorded or written down to be inappropriate or illegal. For example, an informal agreement with a competitor about prices, or passing on commercially sensitive information would be in breach of the law and this Code.

Whether you work with us or for us, if you are ever unsure about whether discussions between you and a competitor or supplier are appropriate, you should ask for advice.

### **A checklist for competing fairly and honestly**

- You must award business solely on merit, always consider the quality of the services/products and seek best value on a competitive basis
- Always run selection processes fairly, giving everyone an equal opportunity, and treating all submissions in the same way
- If in doubt, ask for advice

# 5.

## We will work safely, wherever we are

We require those who work with us and for us to ensure their own safety and the safety of others.

We are committed to providing a safe working environment. This applies when you're working at one of our sites and elsewhere. And safety doesn't just mean preventing accidents; it covers all the other potential risks, from fire prevention, hazardous substances, and working at height, to heavy lifting and the use of equipment.

We expect you to report workplace incidents and hazards. It's also really important that you report near misses (when accidents have almost happened) so that we can take preventative measures.

We expect everyone who works with us or for us to ensure that they are following all the applicable laws and regulations in carrying out their own specific tasks, and delivering a high standard of health and safety at all times.

### **A checklist for health and safety**

- Take personal responsibility for your own safety, whether at one of our sites or elsewhere
- Be aware of your surroundings – step in to stop any work or activity that is clearly unsafe
- Prevention is better than cure – report possible workplace risks and hazards before they cause a problem
- If you are unsure, ask for advice

# 6. ■

## We will treat people with respect, and uphold our position of trust

---

We believe that everyone deserves to be treated in a polite, courteous way, and to have their views and issues listened to and taken seriously.

Many of the services we provide affect people and their homes, and they are putting their trust in us. That's why it's so important that everyone who works for us or with us, treats customers, colleagues and suppliers with courtesy, consideration and respect.

You must always be polite and always listen, and never take advantage of those in a vulnerable position.

Whilst good personal relationships are important, you must never risk favouritism or provide inconsistent levels of service. This will not only reflect on your reputation, but also the reputation of the business.

When we appoint people to carry out work on our behalf, it's because of their experience, skill and ability to provide a high level of service. When we recruit new people we select them solely on the basis of their suitability for the job. We want FirstPort to be a positive place to work – a place where people are free from any sort of prejudice, discrimination or threatening and intimidating behaviour, and are supported to fulfil their potential and develop their talents.

### **A checklist for treating people with respect**

- Always treat people as you would want to be treated yourself
- Remember that actions can be misinterpreted – always be mindful of how your behaviour might appear to others
- Act in a way that you will always be proud of, one which ensures that your customers and colleagues will want to work with you again
- If you see a colleague or supplier behaving inappropriately, report it at once



# 7 ■

## We will be mindful of people's personal privacy and protect confidential information

---

We will handle people's information with the utmost care, and use it only for legitimate business purposes.

The nature of our business means that we are often entrusted with private or confidential information. You should only ever keep the information you need to carry out your business, and must never disclose it—either to colleagues, suppliers or those outside the company—unless you are entitled to do so.

You should be discrete and sensitive in how you handle the information about people and their circumstances.

You may also need to handle commercially sensitive information. This information may be valuable to FirstPort or to those it concerns, and its confidentiality must be respected, whether or not it is marked as private or confidential. You must only use and disclose it to the extent that you are permitted to in order to properly perform your job.

There are specific laws covering data protection and how we handle personal information. So, if your job means that you have access to personal information, you should make sure you know what your obligations and duties are. Ask for advice if you are unsure what you can and cannot do.

### **A checklist for protecting privacy and confidential information**

- Don't discuss or review confidential information or sensitive situations in public places or leave confidential things where people can see them
- Make sure all sensitive material is locked away, and computers are locked in your absence and turned off at night
- Always be discrete and sensitive about people's personal circumstances
- Email and text communications should be treated with the same care as written letters
- If in doubt, always ask for advice before using or disclosing information

# 8.

## We will act responsibly in the community, and in the interests of a sustainable environment

---

We want everyone who works for or with FirstPort to make a positive and constructive impact for the benefit of the communities and the environments in which we operate.

Our businesses are part of the communities in which they operate and many of the services we provide support people living active lives in their own homes.

You should always behave in a considerate and responsible way towards these communities, helping to build community spirit and supporting local charitable activities and other good causes.

Our services involve carrying out work in customers' homes. In this situation you should consider ways to minimise disruption to their environment, including working quietly, tidily and efficiently.

You also have a responsibility to conform to environmental legislation, and minimise impact on the environment by encouraging recycling, reducing energy consumption, and making better use of natural resources. You can play a useful role in helping others around you to do the same.

### **A checklist for being a positive member of the community**

- Consider new ways you could work for the benefit of your local community
- Ensure all waste electrical and electronic equipment is disposed of appropriately
- Take opportunities to recycle, use resources wisely and conserve energy

# 9.

## We will make sure you can always raise questions or concerns

---

We welcome your feedback and we will listen to what you say.

This Code is to help you do the right thing.

If you are ever in doubt about something covered by this Code, taking advice or speaking up is always the right thing to do, and you can be sure that we will look into your concerns.

### FirstPort Colleagues:

#### How to raise questions or concerns

Speak to your line manager first, but if you want to talk to someone else, you can speak to our Whistleblowing Officer or any other contact in accordance with our Whistleblowing Policy. Alternatively if your concern is a grievance, you contact a member of the HR team in accordance with our Grievance Policy

### Suppliers:

Refer to your contact within FirstPort or email **[procurement@FirstPort.co.uk](mailto:procurement@FirstPort.co.uk)** so that your concerns can be registered and acted on

## Summary

### 1.

**We will do business in an open and transparent way, and prevent bribery and corruption**

We will not tolerate any underhand business practice in our own company, or from anyone who works with us or for us.

### 2.

**We will uphold all laws relevant to countering tax evasion, including the Criminal Finances Act 2017**

We take a zero tolerance approach to the Facilitation of tax evasion, whether under UK law or under the law of any foreign Country.

### 3.

**We will avoid conflicts of interest, and follow strict rules for corporate gifts and entertainment**

We will ensure that decisions made at work are not influenced by personal relationships, and never result in improper personal benefit or gain.

### 4.

**We will compete fairly and honestly**

We believe that fair competition is the right way to do business.

### 5.

**We will work safely, wherever we are**

We require those who work with us and for us to ensure their own safety and the safety of others.

### 6.

**We will treat people with respect, and uphold our position of trust**

We believe that everyone deserves to be treated in a polite, courteous way, and to have their views and issues listened to and taken seriously.

### 7.

**We will be mindful of people's personal privacy and protect confidential information**

We will handle people's information with the utmost care, and use it only for legitimate business purposes.

### 8.

**We will act responsibly in the community, and in the interests of a sustainable environment**

We want everyone who works for or with FirstPort to make a positive and constructive impact for the benefit of the communities and the environments in which we operate.

### 9.

**We will make sure you can always raise questions or concerns**

We welcome your feedback and we will listen to what you say.