

Introduction

The Code of Conduct provides clear guidance on what we expect from our employees, and other representatives of ABCA, as well as providing examples of what behaviours, practices and regulations we expect to see demonstrated and complied with. It is based on the policies used for our own practices.

The Code of Conduct sets out the minimum standard of business behaviour expected of employees so that they act in a way that is ethical, corporately responsible and aims to ensure compliance with applicable laws and regulations.

Scope

This Code of Conduct applies to all ABCA Systems Ltd. employees, regardless of position or status, and to contractors and subcontractors.

Policy

Management is responsible for leading and supporting employees in understanding the requirements of our Code of Conduct and how to apply them in practice.

There can be significant consequences of behaviour not in keeping with the Code of Conduct including damage to the Company’s reputation, fines and penalties, and even criminal liability for individuals or the company. Therefore, failure to comply with the Code of Conduct will be investigated and appropriate action taken under the relevant policies.

Ethical Dealings

- Employees must not offer gifts or favours to client’s employees that may be seen as an attempt to influence business decisions. All employees must conduct their business to a high ethical standard and comply with relevant legislation on bribery, corruption and prohibited business practice.
- ABCA has a **zero-tolerance** approach to all forms of tax evasion, whether under UK law or under the law of any foreign country.
- All employees will avoid, or declare to be managed, all situations which place other interests in competition with ABCA. These situations are known as conflicts of interest and may compromise judgement or damage the Company’s reputation.
- As a Company, ABCA Systems Ltd, do not participate in party political activities.
- ABCA Systems Ltd takes environmental and social responsibility seriously and is committed to developing our business towards ecological, social and economic sustainability.
- ABCA Systems Ltd believes that employment should be freely chosen and therefore expects all employees must refrain from using any form of forced, involuntary or debt bonded labour.
- The Company is opposed to the use of any form of Child Labour or practices that inhibit the development of children. Employees must comply with all child labour laws and should not employ anyone under the age of 18. Unless a young person’s risk assessment has been carried out

Health, Safety & Environment

- ABCA Systems Ltd will make suitable and sufficient provision for the health, safety and welfare of their employees, visitors and contractors and those in the community who may be affected by their activities.
- A safe and hygienic working environment should be provided and best occupational health and safety practice promoted, bearing in mind the prevailing knowledge of the industry and of any specific hazards.
- Employees will care for the environment through a commitment to good environmental practices. They are expected to comply with ABCA System Ltd's environmental management system, with reference to the acquired accreditation of ISO 1400.

Employees

- ABCA Systems Ltd expects employees to develop constructive relationships with employees and employee representatives and to recognise the rights of individuals to join trade unions or not.
- Employees should aim to provide equality of opportunity and treatment regardless of race, colour, gender, religion, nationality, sexual orientation, age, or disability. Employees are expected to support equal pay for work of equal value. All employees must oppose discrimination or intimidation towards others including all forms of threats of physical and psychological abuse.
- All employees are expected to treat each other with kindness, dignity and respect at all times. Abusive, offensive, humiliating or intimidating behaviour is never acceptable.

Information

- ABCA Systems Ltd expects employees to have access to confidential information. All employees must not (other than in the proper course of their duties), either during employment or at any time thereafter (unless authorised in writing from the company to do so) directly or indirectly use for their own personal benefit or the benefit of any third party, disclose or permit the disclosure of any confidential information.
- In order to operate effectively and fulfil its legal obligations, ABCA Systems needs to collect, maintain and use certain personal information about current, past and prospective employees, customers, suppliers and other individuals with whom it has dealings. All such personal information, whether held on computer, paper or other media, will be obtained, handled, processed, transported and stored lawfully and correctly, in accordance with the safeguards contained in the General Data Protection Regulations (GDPR).
- In extension to the points above any potential 'inside information' must not be acted on or disclosed by employees.