

<b>Millbank Holdings Group Ltd</b> (Incorporating Priory Design Services Ltd, MDA Rail Ltd, Forbes HR Ltd)		
	<h1 style="color: #008080;">Code of Conduct</h1>	POL009/02/0422
		Last Reviewed: 03/2024
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		Owner: David Hopley

## 1 Policy Statement

Millbank Holdings Ltd Employee Code of Conduct Policy outlines our expectations; and provides a clear framework of how our employees should undertake their duties and behave towards their colleagues, managers, clients and wider stakeholder community.

We strive to maintain a work environment for our employees that reflects our values of heritage, integrity, knowledge and respect.

This code covers some of the most important issues relating to personal conduct, but it is not intended to be exhaustive.

## 2 Scope

This policy applies to all employees regardless of service, contract or position.

## 3 Responsibilities, duties and obligations

Employees are bound by their contract to follow our Code of Conduct while performing their duties. All employees are expected to abide by all Company policies and procedures and any reasonable management instruction.

### 3.1 Compliance with the Law

All employees must protect our company's legality and ensure that they are familiar with the law and regulation as it applies to their duties; and they comply with all legal requirements, including but not limited to; health and safety, data protection, employment legislation, agency worker legislation and equality and diversity. We expect employees to be ethical and responsible when dealing with our company's clients, finances, candidates and public image.

### 3.2 APSCO Code of Conduct

As full members of the Association of Professional Staffing Companies (APSCO) Employees also have a responsibility to abide by the APSCO code of conduct to ensure that we maintain compliance in accordance with their guidelines.

### 3.3 Respect in the workplace

All employees should respect their colleagues and conform to our equality and diversity policy. Employees must work co-operatively within teams and share their knowledge, skills and expertise with colleagues, to uphold the reputation of the business.

Employees must at all times protect and support the health and welfare of all colleagues and visitors.

Employees should be friendly and collaborative. They should try not to disrupt the workplace or present obstacles to their colleagues' work.

### 3.4 Relationships with Other Employees, Clients and Other Customers of the Company

The Company does not concern itself with the private lives of its employees unless this has a detrimental impact on the company's reputation or operation.

Employees who are relatives or who have a close personal relationship should not normally have a supervisory, assessing or authorising relationship with each other.

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Employees must inform their Line Manager if they have a close personal relationship with another employee, a client or customer of the Company which could be considered by colleagues or others, as impacting on the way they conduct themselves at work.

### 3.5 Conduct outside work

We do not seek to dictate how employees conduct themselves in their personal lives outside work. However, unlawful, anti-social or other conduct by employees which may jeopardise the Company's reputation or position will be dealt with through the companies Disciplinary Procedure.

### 3.6 Gambling

Gambling activities must not be conducted on our premises; discretion may be used in relation to small raffles for charitable purposes, national lottery syndicates, occasional sweepstakes etc.

### 3.7 Job Duties and Authority

All employees should fulfil their duties with integrity and respect toward colleagues, clients, candidates and the wider stakeholder community.

Managers must not abuse their authority. We expect them to delegate duties to their team members taking into account their competence and workload.

### 3.8 Attendance and Punctuality

A high level of attendance and punctuality is essential. Employees are to report in plenty of time to start their day and are required to ensure that they are fully fit and adequately rested to perform any duty assigned to them.

### 3.9 Dress Code

Our company's official dress code is smart business wear in the office, if you are meeting a client, business suit should be worn. Employees should be clean and well groomed. Clothing should project an image of professionalism and items that are too revealing or have offensive stamps or logos on shouldn't be worn.

### 3.10 Housekeeping

Work equipment and areas should be kept clean and free from clutter. We operate a clear desk policy, as referred to in our Employee Handbook.

The kitchen facilities and restroom facilities, are for the use and benefit of all employees, they should be treated with respect and kept clean and tidy.

### 3.11 Access to confidential information

Although the Company strives to conduct its business openly there will be times when individuals, in their job role become aware of confidential information, either about other individuals or in connection with the Company's commercial activities. Employees should be aware of the need to keep such matters confidential and to respect the proper channels of communication for such information.

### 3.12 Conflict of Interest

We expect employees to avoid any personal, financial or other interests that might hinder their capability or willingness to perform their duties. Conflicts of interest should be identified so that individuals are not involved in decisions where their actions could be seen as biased.

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### 3.13 Bribery

Employees must declare to their manager any gifts, favours or hospitality invitations offered by clients and suppliers. We prohibit bribes for the benefit of any external or internal party.

### 3.14 Benefits

Employees are expected to not abuse their employment benefits. This can refer to time off, facilities or other benefits we offer.

### 3.15 Safety and Security

Employees are required to observe and uphold health and safety and data protection regulations at all times and ensure any mandatory training is completed.

### 3.16 External Relations

Employees should not write letters or make statements to the press concerning Millbank Holdings Limited or any of its subsidiary's confidential affairs or the affairs of any colleagues or clients.

Notwithstanding the rights of employees under the Public Interest Disclosure Act, employees should not be critical of one another to outside agencies.

Employees must not use their position or the Company's name to support or promote any other organisation, cause or activity unless sanctioned by the Managing Director.

The Company is a non-political, non-denominational organisation and employees should not attempt to promote their political or religious views. Employees are expected to respect the customs and culture of any colleagues, clients and members of the public.

## 4 Smoking

Smoking (which includes the use of e-cigarettes and personal vaporisers) is not permitted anywhere on the Millbank site. If you need to smoke during the working day then please find somewhere safe to do this off the Millbank site.

A reasonable number of breaks may be taken during working hours for the purposes of smoking, but these must be taken at a time or times that are convenient in relation to your work and with the approval of your manager or must be taken as part of your designated rest breaks. All employees must ensure that the length or frequency of their smoking breaks does not have an adverse effect on their performance or the business.

From time to time the HR department may circulate advice and guidance to support employees who may wish to attempt to quit smoking. Additionally, smokers who want to stop smoking may call the NHS smoking helpline on 0800 0224 332 or visit [www.smokefree.nhs.uk](http://www.smokefree.nhs.uk).

## 5 Work-related Functions and Events

During your employment with Millbank, you may be invited to work-related functions and events from time to time. Such events may be formally organised by the company or informally arranged by the employees themselves. Attendance at such events is encouraged.

Ensure that while attendance at such events is enjoyable and fun for all, minimum standards of good behaviour must be adhered to and Millbank must comply with all its legal obligations and responsibilities.

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- Work-related functions and events arranged by Millbank are an extension of the workplace. The company recognises that alcohol may be consumed at such events but nevertheless expects employees to behave responsibly and where alcohol is provided this should not be taken as an endorsement by the company for employees to drink excessively nor for any resulting improper conduct. The company will not be held responsible for bad behaviour on the part of employees and any employees who behave in any way that may bring the company into disrepute or put the health, welfare and safety of other employees at risk by their behaviour while under the influence of alcohol at a work-related event maybe subject to disciplinary procedure.
- Alcohol may only be consumed on the company's premises with the express permission of the Managing Director.
- Employees are reminded that they should be as inclusive as possible in extending invitations to colleagues. Excluding colleagues on grounds of age, sex, race, disability, religion or belief, or sexual orientation may be deemed to be discrimination. Complaints by employees about exclusion from after-work events will be investigated and may result in disciplinary action.
- Promises made by managers to staff while under the influence of alcohol will not have any contractual status. Managers who conduct themselves in such a manner will be subject to the company's disciplinary procedure.

## 6 Personal and company property

You are responsible for ensuring that any of Millbank's property in your possession is properly safeguarded and kept secure at all times. Any loss should be reported immediately.

We do not accept responsibility for loss of, or damage to, private property (including cash). You should ensure that personal property, especially handbags, are not left unattended and are locked away when necessary. Any missing article should be reported immediately.

On leaving the employment of Millbank, you must ensure that you return all equipment and other items belonging to the Company, this includes note books used for meetings, diaries and emails etc.

## 7 Disciplinary Actions

Any employee who repeatedly or intentionally fails to follow our code of conduct may have disciplinary action taken against them. Disciplinary action taken will depend on the nature of alleged offence.

### 7.1 Possible consequences include:


- Demotion;
- Warnings;
- Termination of contract of employment for more serious offences;
- Retraction of benefits for a definite or indefinite time.

We may take legal action in cases of corruption, theft, embezzlement or other unlawful behaviour.

## 8 Related Documents

### 8.1 Internal Documents

- HRSOP007 - Disciplinary Procedure
- POL013 - Equality, Diversity and Inclusion Policy

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### 8.2 External Documents

- APSCO Code of Conduct

## 9 Policy Review

This policy will be reviewed annually, when circumstances indicate a change is needed or when legislation is introduced that necessitates change.

Signed by:

*David Hopley*

Title: Managing Director

Date: March 2024

**Any personal data collected in line with this policy will be stored and used in line with our Data Protection Policy, Retention Policy and Privacy Notice.**