

TRANSPORTATION YOU CAN RELY ON

P52 - Code of Conduct

Policy 01.08.2023



Code of Conduct Policy

Key Points

This code of conduct applies to all employees of McLanachan Transport Limited at all sites and locations.

McLanachan Transport Limited Employee's Code of Conduct sets out the standards of behaviour the Company expects from all employees.

Employee Behaviour

The following general standards of behaviour are required by all employees:

- Employees should behave in a respectful, professional, and polite manner.
- Employees should comply with all reasonable management instructions.
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- Employees should cooperate fully with colleagues and management.
- Employees should always uphold and further McLanachan Transport Limited positive public image.
- Good standards of performance should be always maintained.
- All policies and procedures should be adhered to at all times.

Attendance and Timekeeping

Where a right to refuse work report has been generated work may only continue when:

- Employees should be present and ready to start work in line with their contractual working hours.
- Employees should ensure they notify their line manager in accordance with McLanachan Transport Limited absence procedure if they are going to be absent from work.
- Persistent lateness and other unauthorised absence will be dealt with under McLanachan Transport Limited disciplinary policy and may result in the employee not being paid for the time off.
- For those employees who on occasion, work from home you are responsible for ensuring you are work ready in line with your contractual hours. Working from home must always be approved by your Line Manager.



Communications

Employees should have their personal mobile device on silent mode, during working hours. Discretion should be exercised when using a personal mobile device and any use must not cause a distraction from work for the employee themselves or their colleagues.

In addition, employees are not permitted to:

- give personal phone numbers or home phone numbers to customers
- take pictures of colleagues, Company premises or customers using personal or business mobile devices without authorisation
- copy personal data from any McLanachan Transport Limited encrypted mobile device to a non-encrypted device or to a non-encrypted mobile device

Certain job roles require the provision of a Company mobile phone. Employees should ensure they keep the Company mobile phone in good working order. The mobile phone should remain charged and connected to the network (as far as coverage permits) during working hours so business calls can be received as necessary. Employees should remember that as the Company mobile phones are the property of the Company as is the Mobile Phone number associated. We therefore reserve the right to check usage and history at any time with the authorisation of the Company Directors and that both the ownership and responsibility of the phone remain with the Company. If charges are incurred for personal use on any of company devices, the McLanachan Transport Limited reserves the right to pass those charges onto the individual in possession of the device. Refer to McLanachan Transport Limited Mobile Phone policy for further information.

Dress Code

It is important that employees present a professional image with regards to appearance and standards of dress. You should wear clothes appropriate to your job responsibilities, and they should be kept presentable. We don't intend to set out prescriptive rules with regards to your clothing as we expect a common-sense approach to be taken regarding appropriateness of attire and if your manager feels your clothing is in any way not appropriate, they will raise this with you. Certain roles require PPE and defined uniform. Your department head will advise where specific uniform is appropriate, and you will be provided with this at commencement of employment.

Email and Internet Use

McLanachan Transport Limited will not tolerate use of email and internet for unofficial or inappropriate purposes, including:

- any messages that could constitute bullying, harassment or other inappropriate behaviour.
- on-line gambling.
- accessing or transmitting pornography.



- accessing other offensive, obscene or otherwise unacceptable material.
- transmitting copyright information and/or any software available to the user.
- posting confidential information about other employees, the Company or its customers or suppliers.

Please refer to the procedures and rules set out in this policy and the Information and Security Policy to ensure these are complied with. This is permitted on the condition that all the procedures and rules set out in this policy and the Information Security Policy are complied with. Employees are reminded that McLanachan Transport Limited reserves the right to check history of internet usage as well as emails sent and received to your work email account at any time with authorisation from the Company Directors.

Social Media

When using social media, either in a personal or work capacity, during or outside working hours, employees must adhere to the following guidelines.

Posts on social media must not:

- compromise company, disclose confidential data or disclose sensitive data
- damage McLanachan Transport Limited reputation or brand
- breach laws on copyright or data protection including the GDPR
- contain content that is of a libellous or defamatory nature, this also applies to competitors and external stakeholders
- engage in bullying or harassment
- be of illegal, inappropriate, or offensive content
- interfere with your work commitments
- use McLanachan Transport Limited name or reputation to promote any other product or any political opinions. If any inappropriate behaviour is brought to the attention of the Company regarding social media whether that takes place during or outside working hours action may be taken under the Company's disciplinary policy.

Representing the Company

McLanachan Transport Limited recognises the importance of work life balance and while we do not intend to restrict your activities outside of working hours it is important to remember that activities whether during or outside of working hours which result in adverse publicity to the Company, or which cause us to lose faith in your integrity, may give us grounds to investigate the matter with you under McLanachan Transport Limited disciplinary policy. When attending any work-related social function an appropriate standard of conduct is expected from all employees. This includes but is not limited to any



Christmas lunches, nights out, dinners or other social events with colleagues etc. Work-related social functions can be a great opportunity to celebrate and get to know your colleagues better. These events are fully inclusive, and no one should be left out. However, it is important to remember that our Anti Bullying and Harassment Policy, Disciplinary and Grievance Procedures and Equal Opportunities Policy apply fully at these events.

Fraternisation

Whilst you are encouraged to be friendly towards external stakeholders you work with during the course of your work, it is important that employees do not cross the professional boundaries. Employees should maintain professionalism at all times and under no circumstances should become overfamiliar or fraternise with clients/customers in a way that may be seen to disrupt the operations or reputation of the business. Employees who are found to have acted unprofessionally or inappropriately may be liable to an investigation under McLanachan Transport Limited disciplinary policy.

Alcohol and Drugs

Use of drugs and alcohol during working hours is not permitted. If an employee is suspected of use during working hours the employee may be subject to disciplinary action under McLanachan Transport Limited disciplinary policy. This includes still being under the influence of drugs or alcohol from the previous evening if it has an impact on the employee's ability to perform their role effectively.

Discrimination

Employees will ensure their behaviour does not in any way breach the Equality Act 2010 this includes not in any way bullying, abusing, victimising, harassing or unlawfully discriminating against others. See Appendix 1 for definitions.

Health and Safety

Any accidents, however minor they may appear, should be recorded in the Company's Accident Book as soon as possible. Employees are responsible for ensuring they are familiar with the Company's health and safety policies and procedures, including the consequences of breaching these. If employees are attending the premises of a third party, they are required to familiarise themselves with the applicable policies and procedures.

Smoking

In accordance with the Health Act 2006, company does not permit smoking in the workplace, either on Company premises or in Company vehicles. The Company promotes a working environment which is smoke-free, pleasant, and healthy. This prohibition extends to the use of vaping, e-cigarettes, or similar devices. Please refer to the Smoking Policy for more information.

Bribery

Bribery is, in the conduct of the business, the offering or accepting of any gift, loan, payment, reward or advantage for personal gain as an encouragement to do something which is dishonest, illegal or a breach of trust. Bribery is a criminal offence. No gift should be given, nor hospitality offered by



employees to any party in connection with the Company's business without receiving prior written approval from the Company Directors. Employees may face disciplinary action if it is discovered that they have accepted, offered, or given any bribe. Accepting a bribe also carries separate criminal liabilities for the employee personally and for McLanachan Transport Limited.

Flexibility

McLanachan Transport Limited may request, from time to time, that employees work extra hours at short notice, subject to the needs of the business. Employees may also be requested to perform work which is additional to their usual duties and/or to carry out their role at a workplace other than their usual location of work. These requests will be made to employees as the need arises through the employee's line manager.

Confidentiality

All information gained during the course of your employment is expected to be considered confidential, during your employment and post-employment. Employees are expected to keep this information confidential, unless required by law not to do so. Shredding facilities are provided across all company sites.

Competing with the Company

Employees who undertake external activities that place them, or could place them, in competition with the Company may be subject to disciplinary action. If an employee wishes to undertake other employment while employed by McLanachan Transport Limited, permission is required from the employee's company directors and employees are asked to refer to the restrictive covenants contained in their contract of employment for guidance on post-termination restrictions.

Property and Equipment

Employees who cause any damage to McLanachan Transport Limited property through misuse, recklessness or carelessness may be required to repay to McLanachan Transport Limited the cost of repair or replacement. McLanachan Transport Limited reserves the right to recover this cost by way of a deduction from your next salary payment. When an employee's employment is terminated, employees should return all Company property, including IT equipment, stationery, Company mobile phone or tablet, Company vehicle and any other items belonging to McLanachan Transport Limited.

Personal Property

McLanachan Transport Limited is not responsible for the loss, theft or damage to any personal property brought by employees on McLanachan Transport Limited premises or stored in Company vehicles. Employees are responsible for the security and safety of their personal possessions at all times.

Environment

McLanachan Transport Limited aims to keep use of consumables to a minimum by promoting the effective and efficient usage of equipment, facilities, supplies and services. Employees should make every effort to reduce wastage, turn off excessive lights or heating/cooling equipment, use water



resources appropriately and switch off any electronic equipment which is not in use. Employees should also ensure all windows are closed at the end of each working day. As an employee of McLanachan Transport Limited, you are responsible for ensuring you have read all McLanachan Transport Limited Policies and Procedures which may be provided upon request.

Breaches

Breaches of McLanachan Transport Limited Code of Conduct are likely to be regarded as an act of misconduct to be addressed under the company disciplinary procedure.

Employee Declaration

As per company procedures, all employees must sign their approval and adherence of all the company policies, including this Employee Code of Conduct. If you have not signed your form as an employee, you can do so by visiting: <https://www.mtltransport.com/policy-acceptance>

Appendix 1

Discrimination includes victimising or harassing any other person because of race (including colour, ethnic or national origin, nationality, citizenship), sex, gender reassignment, sexual orientation, marital or civil partnership status, disability, age, religion or belief, pregnancy, and maternity status.

Harassment is any unwanted physical, verbal, or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive situation or environment for them. A single incident can amount to harassment. Harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex, or sexual orientation. Harassment is unacceptable even if it does not fall within any of these categories.

Victimisation provisions protect certain individuals who do (or might do) acts such as bringing discrimination claims, complaining about harassment, or getting involved in some way with another complaint (such as giving evidence). Victimisation may therefore occur where a person subjects another person to a detriment because either that person has acted in such a way and/or is believed to have acted in such a way or may act in such a way.

Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority, but can include both personal strength, influence, and the power to coerce through fear or intimidation. Bullying can take the form of physical, verbal, and non-verbal conduct.



Approved by:

Damian McLanachan

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McLanachan Transport

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