

Southern Air Systems Ltd

Ethics and Conduct Policy

Standards of Business Conduct Required from Southern Air Systems Ltd Employees, Customer and Suppliers

INTRODUCTION

1. Southern Air Systems Ltd expects its staff (including temporary, agency, interim, contractor or consultant staff) to be impartial and honest in all affairs relating to the Company and their job within it. All staff also bear a responsibility as employees to act as ambassadors for the Company in terms of their general conduct both within and outside the organisation. This policy outlines the responsibilities of staff working for the Company.

The duties of an employee are embodied in Common Law and built on by Statute.

2. Under Common Law the duties of an employee are as follows:
 - to be ready and willing to work;
 - to offer their services personally: for example, they must not subcontract the work for which they are employed.
 - to take reasonable care in the exercise of that service, including the duty to be competent at work and to take care of the Company's property;
 - to not wilfully disrupt the Company's business;
 - to obey reasonable orders as to the time, place, nature and method of service;
 - to work only for the Company in the Company's time;
 - to disclose information to the Company relevant to the Company's business: for example, that they might know or discover;
 - to hold solely for the Company the benefit of any invention relevant to the business on which the Company is engaged;
 - to respect the company's trade secrets;
 - in general, to be of good faith and do nothing to destroy the trust and confidence necessary for employment;
 - to account for all benefits – monetary or in kind - received in the course of employment;
 - to not give or receive bribes or otherwise act corruptly
 - to indemnify the employer for loss caused by the employee.
3. United Kingdom Statute places further responsibilities on individual employees regarding their own behaviour and their behaviour towards other employees.

STANDARD OF CONDUCT REQUIRED BY THE COMPANY

Bribery and Other Corrupt Behaviour

4. Southern Air Systems Ltd has a strict anti-bribery and corruption policy in line with the Bribery Act (2010). A bribe is defined as: giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.
5. If an employee bribes (or attempts to bribe) another person, intending either to obtain or retain business for the company, or to obtain or retain an advantage in the conduct of the company's business this will be considered gross misconduct. Similarly accepting or allowing another person to accept a bribe will be considered gross misconduct. In these circumstances the employee will be subject to formal investigation under the Company's disciplinary procedures, and disciplinary action up to and including dismissal may be applied.

Transaction of Private Business

6. Employees having official dealings with contractors and other suppliers of goods or services must avoid transacting any kind of private business with them by any means other than the Company's normal commercial channels. No personal favours or transactions should be sought or accepted.

Visits to Conferences, Demonstrations etc

7. The Company intends that when it is necessary for employees to visit conferences, demonstrations, and similar occasions, it should bear the travelling and subsistence expenses itself unless otherwise approved by a senior manager.

Attendance at Luncheons, Receptions etc

8. Where it is evident that the work of Southern Air Systems Ltd will be facilitated, invitations to attend receptions, luncheons etc. may be accepted under the following rules:
 - no employee may accept an invitation without first obtaining the approval of their line manager;
 - in exceptional circumstances, where it is not possible to seek prior approval, the facts should be reported immediately afterwards;
 - if addressed personally, such an invitation may not be transferred to another employee, except with the consent and approval of a senior manager as above and with the concurrence of the party issuing the invitation;
 - invitations involving attendance outside normal working hours may be accepted only on the authority of the line manager;
 - as a general rule, any employee who has any doubts about accepting any hospitality should politely decline the offer and seek further advice from the management.
9. NB The important difference between, for example, attendance in an official capacity at a function organised by the Company and the acceptance of hospitality from a private individual or firm should be recognised.

Identification

10. Employees who have been issued with identity badges should wear or carry these whilst carrying out their duties. This includes ID badges provided by customers.

Confidentiality

11. At all times confidentiality must be maintained. No information can be released to unauthorised persons or organisations. The Chief Executive / Business Owner or other Senior Managers of the company will inform employees of those authorised to receive information.
12. If doubt exists as to the validity of an organisation or individuals to receive information, this must be checked with your line manager.

Personal Relationships

13. If a personal relationship between two employees develops within the working environment, the onus is on the senior employee concerned to bring this to the attention of his or her manager to confirm that there is no conflict of interest, nor will a conflict of interest arise. The Company reserves the right to move one of the employees concerned if it deems it necessary to do so.

Outside Interests and Employment

14. Outside interests include directorships, ownership, part ownership or material shareholdings in companies, business, or consultancies likely to seek to do business with the Southern Air Systems Ltd. These should be declared to the individual's line manager as should the interests of a spouse / partner or close relative.

Political and civic activities

15. It is not the intention of Southern Air Systems Ltd, or this policy, to dissuade employees from participating actively in public duties. It is important, however, that by doing so there is no suggestion to a third party that the employee is acting on behalf of, or with the support of, Southern Air Systems Ltd. To avoid any misunderstanding, no Company employee should permit his or her company affiliation to be noted in any outside organisation's materials or activities without the express written approval of a member of senior management.

General Conduct

16. Employees should always conduct themselves in such a way as to enhance the reputation of the Company and its products or services.
17. Southern Air Systems Ltd will support employees who become aware of and are willing to report breaches of this policy or who genuinely believe that a breach is occurring, has occurred or is likely to occur within the business. Employees should raise the issue internally with their manager or supervisor or in accordance with the Company's Policy on Disclosing Information ('Whistleblowing').
18. These standards of conduct are intended to underpin and clarify standards required by the Company of its employees and form a fundamental part of the employment contract. Staff who fail to comply with the guidance detailed in this Policy could be subject, following full investigation, to disciplinary action up to and including dismissal. If through their actions or omissions staff are found to be in contravention of either this Policy or, indeed, their legal responsibilities then the Company reserves the right to take legal action if it deems it to be necessary to do so.

Diversity and Equality

19. Southern Air Systems Ltd demands every employee treat each other with respect and dignity. This means that all are entitled to work in an environment that is free of harassment, bullying and discrimination. Harassment, bullying, and discrimination take many forms, including:
- Unwelcome remarks, gestures, or physical contact
 - The display or circulation of offensive, derogatory, or sexually explicit pictures or other materials, including by email and on the Internet
 - Offensive or derogatory jokes or comments (explicit or by innuendo)
 - Verbal or physical abuse or threats
 - Discrimination based on gender or race (Direct or indirect)
20. Customers and employees of Southern Air Systems must adhere to these guidelines regardless of their position or authority. Southern Air holds a zero-tolerance policy against discrimination which disciplinary action up to and including dismissal may be applied. As ambassadors of Southern Air Systems, these standards must be sustained within and outside the organisation.

Customer Satisfaction

21. Southern Air Systems have the following systems and procedures in place to support us in our aim of total customer satisfaction and continuous improvement throughout our business:
- regular gathering and monitoring of customer feedback (discussions between both office staff and field engineers are critical in this instance)
 - to take reasonable care in any service we provide, including the duty to be competent at work and to take care of the customers property.
 - to not wilfully disrupt the customers business.
 - to obey reasonable orders set out by the customer as to the time, place, nature, and method of service.
 - to offer undivided attention to the service that we are providing the customer,
 - to ensure all Southern Air Systems personnel are fully competent to carry out their assigned task
 - to report customer complaints to the relevant member of office staff and dealt with in a timely fashion, regular communication with the customer is critical.
 - customers must be approached with empathy regardless of opinion, we provide our services by putting ourselves into our customers' shoes and dealing with the situation reasonably and fairly.
 - customers should be offered the correct communication avenues to convey their criticisms and actioned accordingly.
 - Southern Air Systems carry out the required corrective and preventive actions to prevent reoccurrence of the same complaint.
22. Southern Air Systems will always aim to support employees that adhere to the policies set out to maintain total customer satisfaction. Employees that do not adhere to the standards will be evaluated and performance measures may be applied.
23. Training of staff through in-house training programmes and in conjunction with carefully selected external providers will be offered if it is deemed necessary. This will be offered to employees that wish to develop further and to also support any employee that may be facing performance review.

24. Southern Air Systems must follow the ISO 9001:2015 standard – “to demonstrate the ability to consistently provide products and services that meet customer and applicable statutory and regulatory requirements, and aim to enhance customer satisfaction through the effective application of the system, including processes for improvement of the system and the assurance of conformity to customer and applicable statutory and regulatory requirements”

Insubordination

25. **Definition:** *Insubordination is a direct or indirect refusal by an employee to perform a legal, ethical, and reasonable directive from a manager or supervisor when the directive has been clearly understood. Insubordination is often confused with misconduct or insolence. Insolence occurs when an employee mocks, insults, disrespects, or shows similar inappropriate behaviour toward a manager or supervisor. Misconduct occurs when employee behaviour is criminal, harassing, or unethical. This behaviour is often outlined in a code of conduct.*
26. While Southern Air Systems offer a progressive viewpoint towards employee’s opinions, this must be discussed appropriately, as part of our continuous improvement, Southern Air encourages free dialogue of its employees to express their opinions and challenge senior members of staff, however; Insubordination is not an appropriate way to convey this and disciplinary action up to and including dismissal may be applied

Misconduct or Insolence

27. Southern Air Systems expect all employees, regardless of seniority or length of service, to conduct themselves in an appropriate manner within the workplace. This policy details our expectations of your behaviour and provides a framework to assist Managers to maintain and deal with breaches of acceptable conduct in a fair and consistent manner.

Matters that are likely considered to constitute misconduct include but are not limited to:

- Being late for work
 - Minor breaches of our policies or departmental operating procedures
 - Minor breaches of your contract of employment
 - Causing minor damage to our property (including vehicles) or failing to report damage at the time of the incident
 - Refusing to follow reasonable management instructions without good reason
28. Gross misconduct is a serious breach of your contract and includes behaviour that is so serious in nature that it is likely to prejudice our business or reputation. As well as damages to working relationship and mutual bond of trust between employer and employee.

If, following a disciplinary hearing, you are found to have committed an act of gross misconduct then summary dismissal (that is dismissal without notice or payment in lieu of notice) is conceivable. Examples of behaviour we are likely to regard as constituting gross misconduct include but are not limited to:

- a) A serious breach or repeated breaches of health and safety rules.
- b) Theft or attempted theft of any item, however small, from the Company, members of staff, customers, contractors, or members of the public. This includes confidential commercial information including that governed by GDPR law.
- c) Falsification of a qualification that is a condition of employment or continued employment, results of vocational tests or falsification of anything that may have resulted in a financial gain to you.
- d) Fraud or attempted fraud.
- e) Falsification of Company records, including but not limited to expense claims, business mileage reports, work reports.
- f) Claiming to be absent from work due to sickness or injury when you are not ill or haven’t suffered any injury. (Doctor’s notes may be requested)

- g) Fighting, physical or verbal assault, threatening or aggressive behaviour towards any member of staff, customer, or members of the public, as well as behaviour which provokes violence.
- h) Deliberate or serious damage to or misuse of Company property.
- i) Reporting for work whilst being under the influence of alcohol, solvents or other such illegal drugs or substances, or using such whilst at work.
- j) Possession, custody, or control of illegal substances or prohibited articles on Company premises including carrying such items in a Company vehicle.
- k) Serious, continued, or deliberate breach of the Company's rules or policies,
- l) Misuse of the company's information systems, including accessing or downloading pornographic or otherwise inappropriate, offensive, or obscene material, distribution of inappropriate emails or material.
- m) Serious neglect in the performance of your duties
- n) Being convicted of a criminal offence that in our opinion is relevant to your continued employment, or your trustworthiness, which may adversely impact your ability to perform your role satisfactorily or which is likely to bring the Company into disrepute or otherwise affect our reputation or relationships with our staff, customers, or the public
- o) Discrimination, harassment, victimisation or bullying of any colleague, customer, contractor, client or member of the public on any grounds and by any means (including through social media), or the abuse of power in your position
- p) Contravention of the laws relating to smoking in the workplace including smoking in a non-designated area or in a Company vehicle
- q) Repeated excessive waste of Company time, including failing to devote the whole of your working hours to the correct performance of your duties, including sleeping whilst on duty, playing computer games, using unauthorised social media or unauthorised internet or shopping during working hours.
- r) Deliberate misuse of the Grievance Procedure or Whistle Blowing Procedure to make malicious or unproven complaints, or otherwise making complaints in bad faith.
- s) Bringing the Company into disrepute or misusing our name
- t) Horseplay or other behaviour which may cause a danger to yourself or others
- u) Unauthorised disclosure of any data in contravention of the Data Protection Act.
- v) Serious breach or unauthorised use or disclosure of confidential information
- w) Failure to comply with the requirements of our Code of Business Conduct
- x) Serious insubordination or a deliberate or repeated refusal to comply with a reasonable management request
- y) Making disparaging comments or otherwise unwarranted and unwanted public statements including those made on social media about the company or its customers and suppliers.

Signed:

Date: