

## **Message from the Board of Directors**

Dear Colleagues

*At Liftec we are committed to doing the right thing in the right way for our customers, employees, the environment and our local communities. Our Code of Ethics and Behaviours along with Liftec's supporting policies outlines the standards and behaviours that Liftec upholds as a company and that we expect where ever we conduct our business, to ensure that the highest standards of honesty and integrity are maintained.*

*Our Code of Ethics sets out in brief, key company policies and procedures in a single documents reminding us, if we are in doubt, of how to behave. The Code provides a guide to the values, behaviours and ways of working which are important to Liftec and which each of us is responsible for upholding as employees. We are encouraged to refer to the Code if facing an ethical dilemma at work.*

*The Board feels strongly to create a supportive environment in which our staff feel able to raise concerns internally without fear of disciplinary retribution. We would encourage anyone, who has any concerns or notices something that doesn't feel right to speak up.*

***The Board of Directors***

***Liftec Lifts Ltd.***

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## 1. Personal and Business Behaviours

- Comply with our statutory and regulatory obligations and operate within the law
- Comply with any health and safety and / or environmental regulations and policies
- Conduct ourselves in a professional manner with the highest standards of honesty and integrity
- Build internal and external relationships on mutuality and trust
- Follow company procedures and policies
- Always doing the right thing and if in doubt seek guidance

## 2. Who does our Code apply to and how to comply

The Code applies to everyone who works for Liftec Lifts Ltd.

All Liftec employees are required to adhere to the Code and policies it refers to. We all have a responsibility to protect Liftec's reputation in everything we do and say. Ensure that you read, understand and act in accordance with the Code and the various policies embedded in it. We want you to understand why this is important and what is expected of all employees. Liftec's Code of Conduct covers in summary the expectations on how Liftec expects its employees to conduct themselves in their roles, to their colleagues and customers and in regarding to the Company's business processes. *(Please refer to your Employee Handbook).*

If you require more information, refer to your Employee Handbook and ancillary policies, or speak with you line manager. Failure to comply the Code and its policies and procedures will result in disciplinary action and may result in dismissal. In instances of fraud where financial loss has been incurred, individuals will be prosecuted and the Company will seek to recover losses.

## 3. Managers Responsibilities

- Ensure the Code is understood by those they manage;
- Provide advice and guidance on interpreting the Code;
- Uphold and promote the requirements of the Code;

### 4. How to raise a concern or ask a question?

Liftec aims to conduct its business with high standards of ethics, honesty and integrity, and recognises that its employees have an important role to play in maintaining this aim. Any employee or contractor providing services to Liftec concerned about any form of malpractice, improper action or wrong doing by Liftec, its employees or other stakeholders is strongly encouraged to report the matter.

Liftec believes it is essential to create an environment in which individuals feel able to raise any matters of genuine concern internally without fear of disciplinary action being taken against them, that they will be taken seriously and that the matters will be investigated appropriately and as far as practicable be kept confidential (*please refer to Liftec's Whistle blowing Policy for additional guidance*).

Liftec believes that any employee with knowledge of wrongdoing should not be silent. We take matters of malpractice, improper action or wrongdoing very seriously and you are strongly encourage to raise incidents and behaviours that are not in accordance with the Code, or the policies to which it refers by following the procedure set out below:

#### **Line Manager or First line of Report**

In the first instance, you should consider raising your concern with your line manager. He/ she has a responsibility to listen and respond to any matter that is of concern to you. Concerns can be raised verbally on an informal basis or in writing. They may be able to agree of resolving your concern quickly and effectively.

#### **Senior Manager / Director**

If you feel you cannot raise your concern with your line manager, for whatever reason, you should contact the senior or director, who will consider the matter, and, if appropriate, manage any investigation.

#### **HR Department**

If you feel you need to raise issue outside of you immediate environment, or if you feel that, after reporting the concern to your manager or a senior manager, you should contact the HR department.

### 5. Bribery and Corruption

At Liftec we do not give or accept payments or gifts in order to conduct business anywhere. We agree supplier terms of payments at the start of business and pay in accordance with our contractual obligations.

Liftec operates a zero tolerance approach to the making or receiving of bribes or corrupt payments, in any form. This type of conduct is absolutely prohibited whether committed by employees or anyone else acting on the Company's behalf.

As an employee of Liftec, you should not get involved in any business transactions that could result in personal benefit. You should not use position as a Liftec employee to get discounts from contractors / suppliers unless they are corporate agreed discounts notified and made available to all employees, or do personal business, unless expressly authorised by management.

All employees are expected to comply with Liftec's Anti-Bribery and Corruption Policy (*please refer to Liftec's Anti Bribery and Corruption Policy in your Employee Handbook*).

### 6. Fraud

Fraud is deemed gross misconduct. Disciplinary procedures will be rigorously applied to any instances of fraud which will result in dismissal. (*please refer to Liftec's Code of Conduct in your Employee Handbook*).

Fraud is the deliberate action by any person, or deliberately allowing an action to be taken to create, falsify, destroy, deface, or conceal any account, timesheet, balance, record or document, or impersonate, deceive or misuse their position with the intention of:

- Obtaining money, assets, services, information or any other benefit which would otherwise be denied;
- Distorting personal or business performance;
- Causing a loss to Liftec or another party (e. supplier, third party contractor, customer or employee);

- Prejudicing Liftec's rights, competitive position or business reputation, or those of another party; and / or
- Attempting or assisting in any of the above.

## **7. Conflicts of Interest**

You should not put yourself in a position where you are involved in an activity for personal gain, to you or your family, which conflicts with Liftec's interests.

Conflicts of interest can take many forms including, but not limited to:

- Engaging in any activity that competes with Liftec.
- Taking personal advantage of an opportunity that belongs to Liftec.
- Engaging in a business relationship on behalf of Liftec where you or a family member has an interest in the other party, unless previously advised to, and agreed by, management.

## **8. Working Relationships**

### **Customers:**

Liftec values the loyalty and confidants of our customers above all else. Liftec will not compromise the safety of its customers and will always strive to live up to the highest standards of quality, customer value, service provision, collaboration and trust. We will always try to make sure that any forms of communication is clear, honest and accurate and the Liftec will always work to respect cultural and ethical beliefs.

Liftec welcomes customer feedback and try wherever possible to act on it to continually improve the service it offers. Liftec makes sure any complaints are handled fairly and professionally within appropriate timescales. Information that Liftec holds about its customer will be handled properly and responsibly. It is Liftec's responsibility to protect its customers' personal data.

### **Colleagues:**

Liftec is fully committed to providing a harmonious working environment in which employees are able to maximise their full potential and to contribute to business success, irrespective of their age, gender, race, nationality, ethnic or national origin, religion or belief, disability, sexual orientation, gender reassignment or marital or civil partner status. Liftec is committed to an active Equal Opportunities Policy (*please refer to the Equal Opportunities Policy in your employee handbook*).

All new employees are inducted when joining the business and trained on company policies and procedures. All employees are given an employee handbook, ancillary documents and working methods to provide them with the safe environment they expect to work in.

We expect that all employees and colleagues are treated with dignity and respect and expect colleagues to treat each other and our customer in the same way. Everyone has a responsibility not to indirectly support unfair behaviour by ignoring what is happening around. It is Company policy to promote an environment free from discrimination, harassment, and victimisation where everyone will receive equal treatment.

Liftec is committed to provide clear, honest and accurate communication directly to its employees, through the Employees Representatives Meeting forum made up of elected personal from different departments. All employees have a chance to have their voice heard and submit their opinions and ideas, get answers and have their views represented when the Liftec considers changes that affect them.

Liftec will not compromise the health and safety of its employees and has clear working instructions and give toolbox talks on how to work safely in your environment. Liftec offers ongoing training and development to enhance career opportunities of its employees. (*please refer to Liftec's Health and Safety policy and Site Safety Handbook*).

Liftec recognises the importance of respecting employee privacy and the need for appropriate safeguards in relation to the collection, storage and processing of personal data. The Company expects that all information held about employees will

be dealt with properly and responsibly. It is everyone's responsibility to handle information properly.

### 9. Business Continuity

Liftec's Emergency Preparedness policy aimed to ensure that we are fully prepared and equipped to continue business in the event of a crisis or disaster. Liftec has a recovery plan which sets out the processes to be followed locally to recover and restart business after a crisis or disaster affecting stores and offices, systems and business processes. Each employee will have responsibilities and your line manager will advise you of these following a major incident.

### 10. Fire, Health and Safety

The Company are committed to ensuring the health and safety of our staff and clients, and to providing a safe environment for all those attending our premises. In accordance with our health and safety duties, the Company are responsible for:

- (a) Assessing risks to health and safety and identifying ways to overcome them.
- (b) Providing and maintaining a healthy and safe place to work and a safe means of entering and leaving our premises, including emergency procedures for use when needed.
- (c) Providing information, instruction, training and supervision in safe working methods and procedures as well as working areas and equipment that are safe and without risks to health.
- (d) Ensuring that equipment has all necessary safety devices installed, that equipment is properly maintained and that appropriate protective clothing is provided.
- (e) Promoting co-operation between members of staff to ensure safe and healthy conditions and systems of work by discussion and effective joint consultation [and

the establishment of a safety committee, safety representatives and accident investigations where applicable].

- (f) Regularly monitoring and reviewing the management of health and safety at work, making any necessary changes and bringing those to the attention of all staff.

### **11. Social Media**

Liftec recognises that its employees may use blogs and/or social networking sites in their personal time, both in and outside of work. These site can be useful and a fun way to keep in touch with friends and colleagues. All employees should be aware that information posted on these is in the public domain and may be viewed by colleagues, customers or the press. Liftec employees have a general obligation to act in the best interests of the Company and not breach Company confidentiality of defy Liftec's Social Media Policy (*please refer to the Social Media policy*). Employees are advised that they should not post inappropriate comments about customers or colleagues.

### **12. Lobbying and Political Engagement**

Liftec strongly supports the democratic political process of the country and is an active member LEIA (the Lift and Escalator Industry Association). The Company does not give donations to political parties or incur EU political expenditure. Liftec will allow employees to participate in statutory duties to have unpaid time off.

### 13. Smoking

Liftec is a smoke free company. This means that smoking is not allowed anywhere on Company premises, including our company vehicles. This extends to our customer's site where employees need to carry out their day to day work. To protect the image and reputation of Liftec, smoking is not allowed and employees must comply with the company Smoking Policy (*please refer to your Employee Handbook*).

### 14. Environment

Since the inception of the company, Liftec Lifts Ltd has developed their business such that it is and remains an environmentally conscious organisation that is fully committed to the effective use and recycling of sustainable, environmentally friendly materials and processes, wherever it is both possible and practical to do so

During this period, we at Liftec Lifts Ltd have forged a close relationship with our customers and supplier's with a view towards continually encouraging them to consider adopting a similar environmentally responsible approach. As such, under the direction and guidance of our company director's, together we are fully committed to:

- Continued environmental improvements
- Using environmentally friendly materials and processes
- Using materials from sustainable sources of supply
- Preventing pollution
- Effective waste management and material recycling
- Comply with, and wherever possible exceed, all applicable legal requirements, and other requirements to which the company subscribes

In striving to achieve the above, we have provided the framework for setting and reviewing environmental objectives and targets. (*Please refer to the Environmental Policy*).

### 15. **Safeguarding & Community**

Liftec has a statutory and moral duty to ensure that the welfare of children and vulnerable adults is safeguarded during any works undertaken by our employees as part of our contractual obligations towards our customers. This is regardless of gender, age, ethnicity, disability, sexuality or religion. This view and policy is promoted as part of our standard practices and expects all staff to share this commitment and includes:

- To ensure that all its staff are clear about their individual behaviour and responsibilities in regard to the safety particularly of children and vulnerable adults, through its recruitment, induction and training;
- To ensure that all suspicions and/or allegations of abuse will be properly investigated and dealt with appropriately and quickly. In particular, if Liftec encounters a case that constitutes, or may constitute, a criminal case against a child / vulnerable adult, the police will be informed.

*(Please refer to the Safeguarding of Children and Vulnerable Adults policy)*

### 16. **Social responsibility**

At Liftec we recognise that our business doesn't stand in isolation and that our customers, employees, suppliers and the local community are all affected by the business and what we do. We therefore take our corporate social responsibilities seriously and are committed to improving our systems to ensure we address all aspects of Corporate Social Responsibility that are relevant to our business. These include a good ethical company culture, concern for employee health and safety, care for the environment and community benefits.

We strive to maintain transparent communications with all parties who may have an interest in our activities including, customers, suppliers and employees.

The Board of Directors takes ultimate responsibility for Corporate Social Responsibility and is committed to developing and implementing appropriate policies

while maintaining a fundamental commitment to create and sustain long term value for the business and its employees.

As a company that is driven to provide high standards of quality assured services and products, our main aim are the talents and skill of our employees.

### **17. Data Protection and Information Handling**

In line with the Data Protection Act, Liftec and its employees need to comply with regulations governing how personal data is handled. Employees or potential employees will be advised by the Company of the personal data which has been obtained or retained, its source, and the purposes for which the data may be used or to whom the data will be disclosed.

The Company will review the nature of the information being collected and held, on an annual basis, to ensure there is a sound business reason requiring the information to be retained. (*please refer to Data Protection Policy in your Employee Handbook*).

Liftec and its employee have to comply with Data Protection Act.