

## THE DECLARATIVE CODE OF CONDUCT

### Why we have a Code of Conduct

#### **Trust is fundamental to everything we do at Declarative.**

We must always act with integrity and honesty to ensure we are trusted by our customers, colleagues, business partners and the communities in which we work.

### What is the Code of Conduct?

The Declarative Code of Conduct is our policy document that highlights the requirements that every single person working for Declarative Ltd must comply with.

### What are the consequences of not complying?

There are very serious consequences for any of our staff or contractors who do not comply with our Code of Conduct which may involve disciplinary action and even dismissal if necessary.

### What does this mean for our staff and contractors?

We expect both our staff and contractors to:

- Behave in an ethical manner taking pride in their actions and decisions
- Comply with the principles of our Code of Conduct and fulfill their legal and regulatory obligations
- Speak up if they feel a working practice is not ethical or safe or if it breaches our Code of Conduct
- Notify the HR team if they think that another employee or contractor is not adhering to our Code of Conduct

### The 5 key factors of our Code of Conduct

#### 1. Security & GDPR

These simple steps should always be followed to safeguard and protect the information provided to us:

1. Value information and classify it as Protected, Private, or Public and act accordingly
2. Operate under our clear desk policy and ensure screens are always locked when away
3. Protect passwords and change them frequently
4. Think before clicking on any email links or attachments or opening any files or documents
5. Protect data at all times and ensure it is encrypted when being transferred or shared

#### 2. Avoid Conflicts of Interest

If found in a position where personal and business interests come into conflict, this must be discussed immediately with our HR team. This could be related to outside activities or investments, friends, co-worker or family relationships, or political involvement.

#### 3. Gifts and Hospitality

We prohibit the giving or receiving of gifts and hospitality, even if they are deemed to be reasonable and proportionate as part of a normal business relationship. We need to ensure we are never influenced or seen to be influenced by the provision of gifts or hospitality, or looking to influence others.

#### 4. Compliance with the law

We will comply with the provisions of all applicable domestic and international laws and appropriate standards and principles.

#### 5. Bribery and improper payments

The law prohibits bribery in every kind of commercial setting. All employees and contractors of Declarative Ltd are committed to countering all forms of bribery.