

# Global Code of Conduct

December 2022



Care



Safety



Trustworthy



Expert



# Message from our Regional Chief Executive Officers

As colleagues, we want our business to prosper – as do our customers, suppliers, shareholders and other stakeholders. But we also want our success to be valued and sustainable: we want to achieve it by doing business in the ‘right way’.

That’s why we’re proud to be measured not just on what we do, but on how we do it. This Code of Conduct brings our policies together into one simple, useful document to guide us all in ‘how’ we should each go about our business – wherever we are, whatever the day.

It sets out the guidelines for our ethical conduct and how we should each behave. As colleagues, we’re all required to follow our Code.

Please take the time to read it. We hope you find it helpful.

**Bob Taylor**

UKIME Chief Executive Officer

**Gilles Mahe**

Asia Pacific Chief Executive Officer

## Contents

Introduction .....	3
Our values .....	4
Respect, dignity and fair treatment .....	5
Health and safety .....	6
Information security and protecting personal data .....	7
Bribery and corruption .....	8
Fraud prevention .....	9
Whistleblowing .....	10
Speaking on behalf of our company .....	11
Protecting yourself .....	12
Appendix One .....	13
Appendix Two .....	14





# Introduction

## Why do we have a Code of Conduct?

Our Code sets out the guidelines and standards for how we should behave as we go about our business – every day, wherever we are.

## What about different country laws?

Our Code establishes our principles and guidance on common legal or ethical issues that apply across our business. It's not meant to cover every law and policy that might apply to you.

## Does our Code include all the policies I need to know?

Our Code and our Group policies tell you what you need to know to do your job in an ethical way. Our Code doesn't replace our detailed policies, but clearly states our principles and the framework upon which our policies are based. As an OCS colleague, you're responsible for knowing and complying with the policies that apply specifically to your work – and to the individual decisions that you make.

## How to use our Code of Conduct

Our Code applies to us all, wherever we are, whatever we do. It guides every business decision we make.

Each one of us is expected to embrace our Code's principles and:

- Show respect
- Act with integrity
- Work ethically and responsibly
- Fulfil our commitments to our customers

## Breaches of our Code of Conduct

We must all comply with our Code, our policies and the law.

Any violations of our Code or laws and regulations could lead to disciplinary action, including termination of employment, and legal action.



# Our values

OCS is a people business and our Values of **Care, Safety, Trustworthy and Expert** are our DNA. They guide everything we do, and everything we don't do. Our Values are us at our best.

By living our Values, we focus not just on what we do for our customers, but on how we do it, delivering great service that demonstrates our care and safety, and how we're trustworthy and expert, time after time.

We celebrate those who place our Values at the heart of their everyday roles through our internal recognition schemes and on our external communication channels, inspiring not only our colleagues around the world, but our customers too.



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### We take care of you

- + We take pride in delivering our customers' needs
- + We respect and look after one another
- + We actively contribute to the communities and environments we work in

### We act safely and responsibly

- + We believe everyone deserves to go home safe every day
- + We create and maintain safe working environments
- + We protect information and confidentiality

### We are trustworthy

- + We keep our promises
- + We can be trusted to do the right thing
- + We deliver time after time

### We work as experts

- + We use our skills to understand and meet our customers' specific needs
- + We add value to our customers
- + We continuously strive to improve our service

# Respect, dignity and fair treatment

## Diversity and inclusion matter to us – that’s why we insist on a fair work environment free from discrimination and harassment.

At OCS, we’re committed to a work environment free from harassment and other offensive or disrespectful conduct.

Harassment is unwelcome verbal, visual or physical behaviour that creates an intimidating, offensive or hostile work environment. Harassment may include:

- Offensive language, gestures, nicknames, jokes or banter
- Racial, ethnic, gender or religious slurs
- Degrading comments
- Intimidating or threatening behaviour
- Hostility towards others because of individual characteristics
- Excluding others from conversations or social events
- Displaying offensive emails, pictures or clothing
- Sexual harassment

Sexual harassment could include:

- Unwelcome advances, propositions or flirting
- Unwanted physical contact or staring
- Inappropriate comments about someone’s appearance, including their clothing or body
- Lewd or suggestive remarks, questions, gestures, language, stories or jokes
- Sharing inappropriate images or videos

**At OCS, we won’t tolerate any verbal or physical behaviour that could be considered intimidating, hostile or offensive. We’ll take appropriate disciplinary action in cases of unacceptable conduct.**

We’re also committed to providing appropriate safeguards, so no colleague’s human rights are compromised. Through our policies we aim to:

- Prohibit child labour, forced labour and human trafficking
- Provide fair and equitable wages, benefits and other conditions of employment in accordance with local laws
- Provide humane and safe working conditions, including safe, clean and sanitary housing conditions
- Require our customers, suppliers and other business partners to adopt similar standards regarding human rights

### Report it

You can report any concerns by contacting our SafeCall service on your local freephone number. All numbers can be found in [Appendix One](#) at the end of this document.

# Health and safety

## Everyone in OCS deserves to go home safe every day.

Our colleagues, families and customers rely on us to ensure this happens. That's why health and safety is our number one priority and we're committed to continuously monitoring, developing and strengthening our safety culture.

At OCS, we care for one other. We must all play our part in putting safety first and building a zero-tolerance incident culture.

### Our Health & Safety ethics and policies are the same in every country we work in.

We're committed to:

- Visible leadership on health and safety
- Instilling safe behaviour and creating a strong safety culture
- Giving our colleagues the correct training and tools to enable you to do your job safely
- Adopting best practice in our work procedures
- Empowering you to make the right decisions about your safety
- Reporting health and safety incidents promptly, including 'near misses'
- Monitoring, reviewing and reporting our health and safety performance accurately
- Continually improving our health and safety procedures
- Carrying out our work in a way that minimises any harmful impact on the environment

### Report it

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### Our Health and safety golden rules

#### Stop and say no if:

- You believe it's not safe to do the job
- You believe the site isn't safe
- You believe the equipment is faulty or you don't have the correct equipment
- You're not trained to do the job or don't feel competent
- You see something that could cause injury

Always stick to safe working practices and follow the rules.



# Information security and protecting personal data

**We must take care of personal data and protect information.**

## Personal Data

At OCS, we respect the privacy of all our colleagues and other individuals, and the confidentiality of personal data.

We routinely hold and deal with information relating to individuals, such as employees (past and present), job applicants, customers, suppliers and other business partners. This includes names, addresses, telephone numbers, email addresses, employment contracts and employment records.

We're an international business and most countries where we operate have laws covering the collection, use, retention and transfer of personal data.

Although these vary, our polices require that we:

- Obtain consent from the individual concerned, as required by local laws
- Only collect data that is adequate, relevant and used solely for the purpose for which it is collected
- Keep the personal data up to date
- Keep the personal data confidential and secure
- Don't retain the data for longer than necessary
- Don't share it, internally or externally, unless this is relevant to the purpose for which personal data is collected
- Don't transfer any personal data between territories without advice from the UK Data Protection Officer
- **Report data breaches immediately**

We must always keep personal information secure. Failure to comply with data protection laws can lead to criminal and financial sanctions for both OCS as a business and for us, as colleagues.

## Information Security

As colleagues, we must protect our company's assets. This includes company data and information such as customer lists and operating manuals, as well as other business and marketing material, ideas, designs, databases and records. You mustn't use our company's confidential information in an inappropriate manner, either for personal gain or to provide an unfair advantage to a third party. All company information is confidential and should be kept secure at all times.

**Be vigilant for misuse or theft of company resources – and report any concerns if you have them.**

### Report it

You can report any concerns by contacting our SafeCall service on your local freephone number. All numbers can be found in [Appendix One](#) at the end of this document.



# Bribery and corruption

## At OCS, we won't tolerate bribery and corruption.

Bribery is a form of corruption that's harmful and illegal. It can severely damage our reputation and have serious legal and financial repercussions.

Bribery means giving, offering, receiving or requesting a corrupt or improper payment or advantage in exchange for something in return.

Situations where there might be pressure to pay a bribe include:

- To win or keep a contract
- To obtain a licence or permit
- An attempt to influence someone or to gain improper advantage (for example, donating to a charity sponsored by a customer or potential customer)
- To secure payment of a debt
- To avoid a fine or penalty

A bribe could consist of money, gifts, hospitality, entertainment, services, employment, charitable donations, preferable treatment or some other advantage. Small, unofficial 'facilitation' payments to ensure or speed up necessary actions are also a type of bribery – so they're prohibited too.

However, meals, hospitality and small gifts can be legitimate activities when done in the right way – so reasonable and appropriate hospitality or entertainment is allowed to build or maintain our good business relationships. But they could be a form of bribery if they're excessive in value, inappropriate in nature, regular or intended to influence a business decision.

What about a third party acting for OCS, such as a supplier, partner, agent or consultant? If they pay a bribe, we could be held liable. That's why we must take care to ensure that any third parties we work with don't use bribery.

**At OCS, we'll take consistent and swift disciplinary action against any colleague who commits bribery. Sanctions can include dismissal and reporting to the relevant authorities where you may be subject to criminal proceedings.**

### Report it

All incidents or suspected incidents should be reported to the Group Company Secretary Scott Thorn-Davis at [scott.thorn-davis@ocs.com](mailto:scott.thorn-davis@ocs.com) or you can report any concerns by contacting our SafeCall service on your local freephone number. All numbers can be found in [Appendix One](#) at the end of this document.





# Fraud prevention

## We must record and report all information accurately and honestly.

Our financial records and the information we provide to our customers and other stakeholders must be accurate and complete. Our records are valuable business information and evidence our actions, decisions and obligations. Our management teams and non-executive directors, and the tax authorities, rely on our financial information to make informed decisions about our business.

Failing to record transactions accurately or falsifying or creating misleading information or influencing others to do so, could constitute fraud. This can lead to fines or penalties for a colleague or for OCS.

That's why we must all ensure that:

- Any company information is recorded accurately, honestly and completely
- All business expenses are accurately recorded and supported by documentation

### What about 'money laundering'?

This is a form of fraud whereby someone tries to hide illegal funds or tries to make the sources of their illegal funds appear legitimate.

Legislation prohibits money laundering or financing for illegal or illegitimate purposes. Potential

indicators of money laundering include:

- Requests from a potential customer or supplier for cash payments or other unusual payment terms
- Paying large sums in cash
- Using multiple accounts or payment methods
- Using an account based in an unexpected location

**Be vigilant of fraud or misreporting and immediately report any concerns.**

### Report it

All incidents or suspected incidents should be reported to the Group Company Secretary Scott Thorn-Davis at [scott.thorn-davis@ocs.com](mailto:scott.thorn-davis@ocs.com) or you can report any concerns by contacting our SafeCall service on your local freephone number. All numbers can be found in [Appendix One](#) at the end of this document.



# Whistleblowing

## At OCS you should feel secure and supported in speaking up.

At OCS, we take malpractice and misconduct seriously. That's why we want all colleagues to feel confident reporting any serious concerns, so we can deal with them fairly and properly.

You must speak up if you believe that one or more of the following has happened – or could happen:

- Any criminal offence
- Fraud and/or corruption
- Theft
- Breach of legislation in respect of immigration, Health & Safety or employment
- Negligent or reckless behaviour
- Bullying or harassment
- Discrimination
- Risks to the environment
- Actions which are intended to hide any of the above

**We treat all matters raised in strict confidence and make every effort not to reveal the identity of the colleague who raises the concern – unless you give your express consent.**

### Report it

All incidents or suspected incidents should be reported to the Group Company Secretary Scott Thorn-Davis at [scott.thorn-davis@ocs.com](mailto:scott.thorn-davis@ocs.com) or you can report any concerns by contacting our SafeCall service on your local freephone number. All numbers can be found in [Appendix One](#) at the end of this document.

# Speaking on behalf of our company

## You must have authorisation to speak or write on behalf of OCS.

The way we communicate with the media and other interested third parties demands specialist skills and experience because it can have important legal requirements – that’s why we manage it carefully.

Only colleagues with specific authorisation and training/briefing may communicate about OCS with the media or respond to any enquiries or questions we receive.

Similarly, when using your own personal social media, you should be clear that you don’t speak on behalf of OCS.

Colleagues must also:

- ensure any personal community, charitable or political activity is not interpreted as being on behalf of, or connected with OCS (unless it is authorised)
- obtain authorisation from their Country/Sector MD before speaking at an event, giving an interview, or writing material for publication in their capacity as an OCS employee.

### Report it

Got any concerns? We’re listening. Get in touch with our SafeCall service on your local freephone number – you’ll find it in [Appendix One](#) at the end of this document.

# Protecting yourself

## We mustn't allow conflicts to arise between our personal interests and those of OCS.

As colleagues, we must always act in the best interests of OCS.

We should be loyal in all matters affecting

our company, including those that relate to our customers and other parties with whom our company has a commercial relationship.

What is a conflict of interest? It's when our own personal interests or external relationships interfere or compete with the interests of our business – or influence our ability to make the right decisions.

Conflicts of interest could include:

- Working for, or owning an interest in, a competitor, customer or supplier
- Hiring or supervising a family member or friend, without the knowledge and approval of our line manager
- Having outside employment that negatively affects our job performance or interferes with our OCS responsibilities
- Using company property, information or resources for our personal benefit or the benefit of others
- Choosing a supplier because of the hospitality at sporting events they provide

If you think that you have a potential, or actual, conflict of interest, make sure you must disclose it promptly. Conflicts can often be resolved with an open and honest discussion.

**Bring an actual or potential conflict of interest to the attention of your line manager immediately or contact SafeCall.**

### Report it

You can report any concerns by contacting our SafeCall service on your local freephone number. All numbers can be found in [Appendix One](#) at the end of this document.



# Appendix One

If you see or hear something that breaches the OCS Code of Conduct, you can report any concerns by contacting your local SafeCall service on the freephone numbers below. Each number is listed in full, so you don't need to enter any other dialling codes.

Country	International freephone	Phone number
Australia	Yes	1800 312 928
Bangladesh	No	00 44 191 516 7782
Cambodia	Yes	1800 209 761
India	Yes	00 0800 440 1256
Rep. Of Ireland	Yes	1800 812 740
Malaysia	Yes	1800 220 054
New Zealand	Yes	00 800 72 33 22 55
Qatar	Yes	8000 250
Saudi Arabia	Yes	800 844 2067
Thailand	Yes	001 800 72 33 22 55
UAE	Yes	8000 441 3376
UK & Northern Ireland	Yes	0800 915 1571



# Appendix Two

If you see or hear something that breaches our OCS Code of Conduct, you can also contact:

Job title	Contact
Group Company Secretary	<a href="mailto:scott.thorn-davis@ocs.com">scott.thorn-davis@ocs.com</a>
UK Data Protection Officer	<a href="mailto:neil.weller@ocs.com">neil.weller@ocs.com</a>