

Employee Code of Conduct

Unless the context requires otherwise, the definition and interpretation of “we”, “Company” or “the business” shall mean Eurostar Group Holdings Limited together with its related companies and subsidiary companies.

Our Employee Code of Conduct Policy outlines our expectations regarding employee’s behaviour towards their colleagues, managers and overall organisation.

We promote freedom of expression and open communication, but we expect all employees to follow our Code of Conduct. You should avoid offending, participating in serious disputes and disrupting our workplace. We also expect you to foster a well-organised, respectful and collaborative work environment.

It is every employee’s responsibility to follow our business practices and standards of behaviour for the protection and comfort of all;

1. Everyone deserves the right to live and work with dignity. We respect and promote human rights.
2. We treat everyone fairly, with respect and integrity and without any discrimination.
3. We believe in equal opportunities for all and help employees develop talents and realise their potential.
4. We respect each other and are all responsible for creating a workplace free of bullying or harassment.
5. We operate a safe workplace for our staff and visitors. We give our employees the training and information they need to keep themselves, their colleagues, visitors and our property safe.
6. We must avoid or manage situations where personal interest could conflict with the interest of the business.
7. We need to follow and adhere to many regulatory processes and rules.
8. We should ensure all financial and other reports and records are honest, accurate and secure.
9. We advocate a collaborative team spirit across our business, caring about each other as well as the community we work in and the world in which we live.
10. We behave with integrity and deal honestly and fairly with our employees, suppliers, partners and customers.

Company employees are bound by their contract to follow our Employee Code of Conduct while performing their duties and all employees must protect our Company’s legal responsibilities. We expect employees to be ethical and responsible with dealing with our Company’s confidential information, finances, products, partnerships and public image.

Respect in the workplace

All employees should respect their colleagues. We won’t allow any kind of discriminatory behaviour, harassment or victimisation. Employees should conform with our Equal Opportunities Policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations. This includes when offsite performing work duties or whenever representing the Company. Each employee is responsible for upholding this standard and to speak out if they consider a colleague is acting in a manner that is contrary to these expectations.

Protection of Company property

All employees should treat Company property, whether material or intangible, with respect, care and safety.

Employees:

- Shouldn’t misuse Company equipment, use it frivolously or use it without proper training.
- Should respect all kinds of incorporeal property. This includes trademarks, copyright and other property (confidential information, reports etc). Employees should use them only to complete their job duties.

Employees should protect Company facilities and other material property (eg Company cars, technical equipment) from damage and vandalism, whenever possible.

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	Author:	Catherine Franklin	Authorised by:	Peter Carnall

Professionalism

All employees must show integrity and professionalism in the workplace:

- **Personal appearance**

All employees must follow our Dress Code and Personal Appearance guidelines.

- **Corruption**

We discourage employees from accepting gifts from clients or partners and prohibit bribes for the benefit of any external or internal party. Any such gifts should be disclosed to Finance and HR for record keeping.

- **Job duties and authority**

All employees should fulfil their job duties with integrity and respect towards customers, stakeholders and the community. Supervisors and managers mustn't abuse their authority. We expect them to delegate duties to their team members taking into account their competences and workload. Likewise, we expect team members to follow their line manager's instructions and complete their duties with skill and in a timely manner. We encourage mentoring throughout the Company.

- **Absenteeism and tardiness**

Employees should follow their schedules. We can make exceptions for occasions that prevent employees from following standard working hours or days. However, generally, we expect employees to be punctual when coming to and leaving from work.

- **Conflict of interest**

We expect employees to avoid any personal, financial or other interests that might hinder their capability or willingness to perform their job duties. Refer to the Employment Contract for more details on disclosures.

- **Collaboration**

Employees should be friendly, professional and collaborative. They should try not to disrupt the workplace or present obstacles to their colleagues' work.

- **Communication**

All employees must be open for communication with their colleagues, managers or team members.

- **Safety**

All employees must act responsibly and safely for the benefit of themselves, colleagues and visitors.

- **Benefits**

We expect employees to not abuse their employment benefits. This can refer to time off, facilities, insurance or other benefits the Company offers.

- **Policies**

All employees should read and follow our Company policies. If you have any questions, you should ask your line manager or HR.

Any breach of the above will render the employee liable to disciplinary action under the Company's disciplinary procedure up to, and including, dismissal. For more details, please refer to the Code of Conduct training document and/or the Staff Handbook.

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