



**HRP02**  
**Code of Conduct Policy**

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**Circulation List**

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1	Human Resource Management Representative

**Amendment History**

This policy is reviewed periodically, at least annually, and is retained for a period of three (3) years. Amendments and revisions are distributed to the named holders. The history of amendments and the issue of revisions are recorded below.

<b>Date</b>	<b>Amend. No.</b>	<b>Page No.</b>	<b>New Issue No.</b>	<b>Reason for Change</b>	<b>Authorised By</b>
01/06/2019	-	All	1	Initial release	Dmitry Samarin
01/06/2020	1	All	2	Annual review	Dmitry Samarin
01/06/2021	2	All	3	Annual review	Tony O'Sullivan
01/06/2022	3	All	4	Annual review	Tony O'Sullivan
20/02/2024	4	All	5	Annual review	Tony O'Sullivan
05/09/2024	5	All	6	Corporate changes	Tony O'Sullivan
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## 1. General Principles

This Code of Conduct Policy should be read in conjunction with the RETN Capital's Disciplinary Procedure. The aim of the Code of Conduct is to set out the standards of conduct expected of all staff and to provide a framework within which managers can work with employees to maintain those standards and encourage improvement where necessary.

It is RETN Capital's policy to ensure that any disciplinary matter is dealt with fairly and in accordance with the Disciplinary Procedure.

If an employee is in any doubt as to their responsibilities or the standards of conduct expected they should seek to clarify this by raising the matter with their line manager.

## 2. Code of Conduct

Managers have the responsibility to ensure that all employees for whom they are responsible know and understand the rules contained within RETN Capital's Code of Conduct.

While employed by RETN Capital, employees should at all times maintain professional and responsible standards of conduct. In particular, staff should:

- Observe the terms and conditions of their contract, express and implied;
- observe RETN Capital's policies, procedures and regulations, these can be found on the staff intranet or are notified to employees from time-to-time by means of notice boards, e-mail the intranet or otherwise;
- take reasonable care in respect of the health and safety of self, colleagues and third parties and comply with RETN Capital's Health and Safety Policy; and
- comply with all reasonable instructions given by managers.

Failure to maintain satisfactory standards of conduct may result in action being taken under the Disciplinary Procedure.

## 3. Misconduct

The following are examples of matters that will normally be regarded as misconduct and will be dealt with under the Disciplinary Procedure:

- Minor breaches of RETN Capital's policies and procedures;
- minor breaches of an employee's employment contract, this can include:
  - Poor timekeeping.
  - Being absent from work without prior authorisation or good reason.
  - Unacceptable levels of absence from work.
  - Refusal to follow reasonable instructions.
  - Negligence in the performance of an employee's duties.
- Damage to, or unauthorised use of, RETN Capital's property;

- inappropriate use of RETN Capital's telephone for personal calls;
- inappropriate personal e-mail or Internet usage;
- obscene language or other offensive behaviour; or
- smoking in no-smoking areas.

This list is intended only as a guide and it is not intended to be exhaustive.

#### 4. Gross Misconduct

Gross misconduct is misconduct which, in RETN Capital's opinion, is likely to prejudice its reputation or irreparably damage the working relationship and trust between employer and employee. Gross misconduct will be dealt with under RETN Capital's Disciplinary Procedure and if substantiated will normally lead to dismissal without notice or pay in lieu of notice (summary dismissal).

The following are examples of matters that are normally regarded as gross misconduct:

- Serious misuse of RETN Capital's property or name;
- bringing RETN Capital into serious disrepute;
- serious breach of trust and confidence;
- serious misuse of RETN Capital's information technology systems (including misuse of developed or licensed software, use of unauthorised software and misuse of e-mail and the internet);
- a breach of RETN Capital's equalities Policies including discrimination, harassment or victimisation;
- victimising another who has raised concerns, made a complaint or given evidence or information to RETN Capital for any reason;
- deliberately accessing and remaining connected to internet sites containing pornographic, offensive or obscene material;
- physical violence or bullying, actual or threatened violence or behaviour which provokes violence;
- incapability to work brought on by the misuse of alcohol or drugs;
- possession, supply or attempted supply of illegal drugs;
- serious breach of health and safety rules;
- fraud, forgery, theft or unauthorised removal of RETN Capital's property or the property of an employee, contractor, learner or member of the public;
- undertaking unauthorised paid or unpaid employment during an employee's working hours;
- acceptance of bribes or other undeclared and inappropriate payments arising out of an employee's employment;
- deliberate damage to RETN Capital's buildings, fittings, property or equipment, or the property of an employee, contractor, learner or member of the public;
- conviction for a criminal offence that in RETN Capital's opinion may affect its reputation or relationships with its employees, learners or the public, or otherwise affects an employee's suitability to remain an employee;
- providing false details in an application for employment or giving false information as to qualifications or entitlement to work (including immigration status) in order to gain employment or other benefits;
- repeated or serious disobedience of reasonable instructions or other serious act of insubordination or serious neglect of duties;
- breach of RETN Capital's Safeguarding Policy or Procedures;
- deliberate or unauthorised use, processing or disclosure of personal data or confidential

- information contrary to RETN Capital's Data Protection Policy; and
- malicious or vexatious use of RETN Capital's Grievance Procedure.

This list is intended only as a guide and is not to be considered exhaustive.

## 5. Review

This policy was approved by the Chief Executive Officer on 01/06/2022 and is subject to annual review.



**Tony O'Sullivan**  
**Chief Executive Officer**  
**RETN Capital Ltd**

**20 February 2024**

## 6. Declaration

I, the undersigned, have read and understood this policy in its entirety and agree to comply with it in full and without exception.

**Name (Please print):** \_\_\_\_\_ **Signature:** \_\_\_\_\_

**Date:** \_\_\_/\_\_\_/\_\_\_