

# Code of Conduct Policy

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## 1. Policy Statement

SeenEm<sup>®</sup> is committed to maintaining the highest standards of professional conduct, integrity and ethical behaviour. This Code of Conduct sets out the expectations for behaviour and professionalism for all individuals working for or on behalf of SeenEm<sup>®</sup>.

All individuals are expected to act honestly, responsibly and in a manner that protects the reputation and interests of SeenEm<sup>®</sup>.

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## 2. Scope

This policy applies to all:



Employees



Directors and officers



Contractors and consultants



Agency workers



Anyone representing SeenEm<sup>®</sup> in a professional capacity

Compliance with this policy is mandatory.

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## 3. Professional Behaviour

All individuals must:



Act with honesty, integrity and fairness



Treat colleagues, clients and third parties with dignity and respect



Avoid conduct that could damage SeenEm<sup>®</sup> 's reputation



Comply with all applicable laws, regulations and internal policies

Unacceptable behaviour will not be tolerated.

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## 4. Equality, Dignity and Respect

SeenEm<sup>®</sup> is committed to providing an inclusive and respectful working environment.

Discrimination, harassment, bullying or victimisation of any kind will not be tolerated and must be reported in accordance with SeenEm<sup>®</sup> 's policies.

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## 5. Dress Code and Personal Appearance

Individuals are expected to present themselves in a professional and appropriate manner at all times.

Dress standards should:



Be appropriate to the role and working environment



Reflect a professional image



Meet health and safety requirements

Reasonable adjustments will be made where required for cultural, religious or medical reasons.

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## 6. Communication and Conduct

All forms of communication, including verbal, written and digital communication, must be:



Professional and respectful



Free from offensive, abusive or inappropriate language



Appropriate for the audience and context

This applies to emails, messaging platforms, social media and virtual meetings.

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## 7. Use of Company Property and Systems

Company property, equipment and systems must be:



Used responsibly and primarily for legitimate business purposes



Protected from misuse, damage or unauthorised access



Used in compliance with IT, data protection and security policies

Unauthorised use of company property or systems may result in disciplinary action.

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## 8. Confidentiality and Data Protection

Individuals must protect confidential and sensitive information relating to:



SeenEm<sup>®</sup>



Clients and suppliers



Colleagues and workers

All data must be handled in accordance with the **UK GDPR** and the **Data Protection Act 2018**.

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## 9. Conflicts of Interest

Individuals must avoid situations where personal interests conflict, or appear to conflict, with the interests of SeenEm<sup>®</sup>.

Any actual or potential conflicts of interest must be declared promptly.

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## 10. Gifts, Hospitality and Bribery

SeenEm<sup>®</sup> has a zero-tolerance approach to bribery and corruption.

Gifts or hospitality must:



Be reasonable, proportionate and infrequent



Not influence or appear to influence business decisions



Comply with the **Bribery Act 2010**

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## 11. Health, Safety and Wellbeing

All individuals must:



Comply with health and safety procedures



Take reasonable care for their own health and safety and that of others



Report hazards, incidents or concerns promptly

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## 12. Reporting Concerns

Any concerns regarding breaches of this Code of Conduct should be reported in line with SeenEm<sup>®</sup>'s reporting or whistleblowing procedures.

Reports will be handled confidentially where possible and investigated appropriately.

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## 13. Breaches of the Code

Breaches of this policy may result in:



Disciplinary action



Termination of employment or engagement



Referral to regulatory or law enforcement authorities where appropriate

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## 14. Review and Approval

This policy is reviewed annually by the Board of SeenEm<sup>®</sup> to ensure it remains effective and compliant with UK law and best practice.

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**Approved by:** The Board of SeenEm<sup>®</sup>

**Review frequency:** Annual

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