

Code of Conduct

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The Pullman Way

Created by our employees, our values express how we work with colleagues and customers. Every person at Pullman, from boardroom to workshop floor, lives these values every day.

Our values

- Excellence - We are the best at what we do
- Integrity - We do the right thing
- Passion - We love what we do
- Proactivity - We are one step ahead
- Togetherness - We are better together
- Trust - We do what we say we will

Our Principles

- We are inclusive. We trust and respect individuals, achieving our common goals together.
- We work with uncompromising integrity and raise any concerns we have about compliance with this code, our policies or the law.
- We deliver a high level of achievement and contribution.
- We encourage proactivity, innovation and personal development.
- We have a responsible, long term perspective.

In short...

By adopting the Pullman Way and the values and principles that underpin it, we make our customers' business better, every day.

Together we will build the most innovative, effective and respected Fleet solutions company, grow as a result and become the aspirational place to work and build a career.

What is it for?

The Pullman Way is our commitment to how we work and our recipe for success in becoming the UK's most innovative, effective and respected Fleet solutions company.

Combining expectations, principles and aspirations, the Pullman Way clearly sets out how we work and how our values support us in connecting and delivering with our colleagues, customers, communities and suppliers.

The Pullman Way acts as a compass, making sure we're always heading in the right direction, remaining performance-focused and productive, whilst doing the right thing and being legally compliant in everything we do.

We are clear that we expect our colleagues, partners and suppliers to follow the Pullman Way at all times, making us a company that people aspire to work for and with.

Who Does it apply to?

The Pullman Way applies to everyone who works for or represents Pullman:

- Our directors, Managers and colleagues
- Those we choose to work with and those who aspire to work with us

Pullman colleagues managing third parties such as suppliers, consultants, contractors and sub-contractors should expect them to adhere to the Pullman Way and provide the appropriate information and training to enable them to do so.

Appropriate action should be taken if a third party is shown not to have complied with the Pullman Way. This may include termination of contract or project withdrawal.

What we expect of our colleagues

Be familiar with the Pullman Way and the associated detailed policies relevant to your responsibilities and adhere to them.

Keep up to date with changes in your industry sector or in the regulatory landscape that might affect Pullman's legal compliance, ethical position or market reputation.

Raise any concerns you may have about our current or proposed activities as promptly as you can and in the appropriate way.

Participate fully in any investigation of potential non-compliance.

Upholding the Pullman Way is an explicit expectation of all our colleagues and leaders. Those who do not do so may face investigation and disciplinary action up to and including termination of employment.

Although we try to focus on the positive actions the Pullman Way fosters, there will occasionally be times when negative behaviours must be addressed. In these circumstances we will have zero tolerance of:

- Condoning unsafe working practices
- Breaking the law or encouraging others to do so
- Discrimination on any grounds
- Bullying and harassment
- Violence and aggression
- Bribery and corruption
- Fraudulent activity
- Retaliation against those who speak up and do the right thing
- Misuse of Pullman data or IT systems

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What we expect of our leaders

Our leaders are responsible for the performance and productivity of their organisation and the delivery of their business objectives.

Our leaders are held accountable for creating an environment which allows the Pullman Way to flourish, which monitors how well we are following it, and which deals appropriately with any instances of potential non-compliance.

Leaders should ensure that colleagues and partners feel accountable for our legal and ethical performance and for working in a way that embodies our values. Business results should never be put ahead of policy compliance and ethical conduct.

Leaders must set the example and act and talk with integrity always, recognising that they are the local embodiment of the Pullman Way.

If you lead a team or manage partners, you must ensure they are all familiar with the Pullman Way and provide them with the support and advice required to apply it and uphold its intent.

Colleagues should be supported to safely and constructively question how things are being done and raise any concerns about whether the Pullman Way is being followed.

Leaders should measure and monitor compliance with the Pullman Way and establish control measures as necessary.

Any concerns raised should be documented and acted on promptly and appropriately with corrective and disciplinary action taken as necessary.

Speaking Up

If you encounter a problem with a colleague or situation, you should try to resolve the matter constructively with those involved. If this is not possible, you should speak to your line manager or HR business Partner.

If it is not possible to talk to any of the above, please follow the Whistleblowing Policy which provides a confidential way to raise concerns about activities that you consider to be outside the Pullman Way.

Speaking up is the right thing to do. We want to know about your concerns so we can do something about them and make Pullman a better place to work and thrive.

Health and safety

We are committed to the health, safety and welfare of our colleagues and others

- Deliver safety first
- Ensure the availability of robust systems and processes to comply with statutory requirements, and the attitudes and behaviour of our colleagues drive improvement in health and safety
- Unsafe behaviour or working practices is not condoned.
- Ensure that you understand the H&S requirements of your job and get help from the H&S team if you need it
- Always follow our safe systems of work and meet our H&S Policy and standards
- Stop work if you think it is unsafe to continue
- Make sure you have the right H&S training required for your job
- Challenge colleagues if you think that an action or decision is unsafe and might result in increased risk of harm to colleagues or others
- Immediately report H&S incidents, including near misses and unsafe acts, omissions or conditions
- Speak up if you think that actions or decisions may result in an increased risk of harm or breach of our H&S Policy or procedures.

The environment

We are committed to the protection of our environment and the sustainable use of resources

- We have robust systems and processes to comply with environmental legislation
- Make sure that you understand the environmental standards with statutory requirements, and the attitudes and requirements of your job and get help from the behaviour of our colleagues drive improvement in environment team if you need it reducing our environmental impact
- Always work within our Environment Policy
- We will not condone behaviour or working and systems practices that put the natural environment at increased risk of harm.
- Stop work if you think it will potentially cause avoidable, uncontrolled pollution
- Make sure you have the right environmental training required for your job
- Challenge colleagues if you think that an action or decision might result in increased harm to the environment
- Report environmental incidents, including near misses and environmentally unsustainable acts, omissions or conditions
- Speak up if you think that actions or decisions may result in harm to the environment or not meeting our environmental standards, policies or procedures.

Equality, diversity and inclusion

- All employees are inclusive and treat others openly, honestly and with respect and Treat everyone with fairness, respect and dignity.
- Do not tolerate bullying, harassment or unlawful discrimination and expect colleagues to intervene
- Not behave in a way that is disrespectful, offensive, malicious, bullying or intimidating speak up if they see it or experience it
- Not make inappropriate "jokes" or comments which are discriminatory
- Recruit, manage, and develop our colleagues without regard to race, colour, religion, gender, age, sexual orientation, marital status, disability or any protected characteristic.
- As a manager, recruit, manage and develop colleagues based only on qualifications, skills, experience and other objective criteria
- Not engage in sexual harassment including inappropriate physical contact, expressions, gestures, comments.
- Not exclude others from workplace activities and or any other protected opportunities because of their race, colour, religion, gender, age, sexual orientation, marital status, disability.
- Understand and value our colleagues' commitments beyond the workplace and support them in achieving a balance between work and personal life.
- Speak up if you see or experience behaviour which you think constitutes bullying, harassment or discrimination.
- Value diversity and promote equal opportunities for all colleagues

Performance and reward

- Aim to reward our colleagues fairly and consider individual contributions to the performance of the business
- Ensure you perform your job to the best of your ability, responding to feedback constructively and participating fully in the company performance management process.
- Set and assess objectives and performance goals fairly and consistently
- Invest in the education, training and skills development of our colleagues to improve the capability and capacity of our business.
- As a manager, actively recognise excellence and address under-performance, supporting and promoting the development of your team.

Colleague engagement

We expect collaboration and respect between our colleagues and encourage openness and honesty in our relationships

- Employees accept accountability and responsibility for delivering the best results for our customers
- Engage, include and involve our colleagues in business improvement and value their feedback and ideas, providing safe spaces for them to give opportunity to openly speak and suggest ideas
- Ask for, provide and act on constructive feedback
- Be open with your colleagues and act with integrity
- Employees respect the relevant processes and laws on collective representation and consultation and recognise that joining a trade union is an individual choice
- As a manager, engage your team, make sure they know what's expected of them; what contribution they are making to our success and how your decisions and actions affect them
- All employees should endeavour to share information and discuss business and employment issues with our colleagues and their representatives
- As a manager make sure your team have the help and support, they need.
- All employees must resolve disputes fairly.

Business reporting

- Always act within the law and the applicable professional standards
- Maintain complete and accurate records of our operational and commercial activity and business dealings, including all our expenditure and transactions with external organisations and individuals
- Our financial and business reports are prepared on time and present the information accurately and fully
- Maintain information, financial and operational controls and an effective system of risk management and compliance
- Ensure we are committed to the prevention of fraud and aim to detect and investigate any apparently fraudulent activity
- Always pay the taxes, levies and tariffs applicable to our transactions and goods.
- Record all information and transactions of any aspect of the company's business, accurately, in a timely way and in accordance with the appropriate policies and procedures
- Preserve documents and records in accordance with the applicable legislation or policy
- Comply with all financial and other business controls
- Comply with our policies in relating to all tax matters and dealings with tax authorities
- Complete equipment and service testing documentation accurately, truthfully and objectively
- Not compromise the integrity of our business records, reports, products or services or influence others to do so
- Not make a deliberately false or misleading entry in records and reports or falsify any corporate records
- Speak up regarding any suspicion of fraud to your line manager or follow the whistleblowing process

Excellence, innovation and continuous improvement

- All employees must acknowledge that a commitment to excellence and innovation is essential to customer satisfaction and business success
- Take responsibility for delivering an excellent service that exceeds the expectations of our customers
- Understand that innovation requires risk-taking from those putting ideas forward and developing new ways of working
- Adopt our quality management, continuous improvement and innovation processes.
- Deliver the tools, processes, support and training to foster innovation within the business
- Respond promptly by taking action to address any concerns about possible quality and service issues
- Apply our Quality Systems in all our operations, always.
- Actively identify ways to innovate and continuously improve our operations to achieve enhanced services and process excellence
- Ensure all employees are committed to Continuous Improvement by inclusive collaboration across sectors, functions and regions
- Generate the opportunity for the all employees to potentially innovative ideas forward using the tools available.

Protecting our assets

- Our service capability, intellectual property and commercially sensitive data and information are crucial business assets and we protect them from unauthorised disclosure and use
- Only use our physical and information assets for business purposes, unless you have prior authorisation for other use
- All employees take responsibility for the care and proper use of our physical business and customer assets including computer systems, vehicles, facilities, MHE and other equipment
- Maintain assets carefully, guarding against damage, theft, waste and abuse
- Not seek personal gain from the use, sale or disposal of our business assets
- Our information systems or other physical assets must not have access, store or transmit any information considered to be offensive, obscene or inappropriate.
- Value the company's time to fulfil the responsibilities of your job
- Not attempt to avoid IT security controls
- Keep all our documents and data protected, stored securely and on the correct system
- Not disclose our commercially sensitive information to third parties without authorisation
- Always seek guidance before giving information, opinions or views to third parties.

Confidential information

- Protect information in our possession that is confidential or proprietary to other parties, such as customers, suppliers and partners
- Avoid placing yourself or the company in the position of receiving other parties' confidential or proprietary information or assets when not authorised to do so.
- Do not attempt to obtain or use without authorisation the confidential or proprietary information of other parties
- Not acquire or duplicate documents or material unless authorised to do so
- When working with customers such as defence companies where national security may be an issue, we will manage customer classified or proprietary information, materials and assets in accordance with the appropriate policies, processes and legislation.
- Not seek access to classified materials from defence companies where access is not required for legitimate business purposes or if you are not authorised to do so
- Keep all documents and data entrusted to us by other parties protected and secure. Where national security may be a concern, classified information should be managed in accordance with the appropriate policies, processes and legislation
- Not disclose, either internally or externally, commercially sensitive information about a customer, competitor or partner, without their permission to do so
- Seek advice if you are unsure.

Privacy

- Please respect the personal privacy of our colleagues and others
- Ensure we collect and process personal information only in line with our company policies and the applicable legislation in order to meet necessary business needs and legal requirements
- Respect the privacy of colleagues and individuals whose personal information you may hold or process
- Only create, save, process, hold, disclose and transfer personal information in line with our data protection policies and applicable legislation
- Guarantee personal information is secure to maintain the privacy of individuals
- Speak out if you have any concerns about how personal information is processed or managed by your team or other colleagues
- Complete periodical reviews and monitor messages, call records, and other digital information for security and other business purposes in line with applicable legislation.
- Not access, retain or disclose personal information to anyone internally or externally except company policies and applicable legislation
- Speak to your Data Protection Officer if you are unsure.

Media and communications

Our reputation is a key asset and we always behave in a manner that maintains and reflects well on our brand

- Only those who have explicit permission to do so should act as a spokesperson for the company
- All sponsor activities that meet commercial objectives will have a positive effect on the reputation of our business and its stakeholders
- keep all our stakeholders well informed by providing information that they can access easily.
- Marketing and Communications is responsible for the management of any official company presence, comments or opinions in the press or on social media and make sure that the information provided is accurate and not misleading.
- Always behave and act in a way that protects or enhances our reputation and brand when speaking about our business, colleagues or others, even when outside the workplace.
- Not speak to the media or representatives of the investment community about our business without prior authorisation
- Not, as a colleague in Pullman, use social media to post or display non-public information about the company and its stakeholders and/or that is threatening, intimidating, harassing, discriminatory, vulgar, obscene or libellous u
- Not engage in social media forums for business purposes while acting for the company without prior authorisation from Marketing and Communications
- Not use any materials requiring customer approval without their prior authorisation.

Anti-bribery and corruption

We comply with anti-bribery and corruption legislation and the Pullman policies and procedures that prevent bribery and corruption

- As an employee of Pullman do not offer, give or accept anything that can be perceived as, or has the effect of, unfairly or improperly influencing business decisions
- In all instances use our own colleagues to conduct our business. However, when having to use other parties, we will only appoint partners of known integrity and require that their conduct meets our standards, always.
- Only offer or accept gifts or hospitality acceptable under the relevant company policies
- Make sure that all partners are approved under the relevant company policies following due diligence, and ^u that they work with Pullman under a valid, approved contract
- Not make facilitation payments

- Make sure all sponsorships and donations are properly authorised.

Conflicts of interest

- All employees must avoid any relationship, opportunity to influence or activity that will compromise our ability to make fair and objective business decisions.
- Do not use any non-public information about any company for buying or selling shares or financial instruments for personal gain and we will not pass on such information to others.
- Notify your manager of any personal or professional relationships that could cause a conflict of interest.
- Not provide any services or information to a current or potential competitor without prior authorisation.
- Not place business with a firm owned or controlled by a colleague of Pullman or their family, without prior authorisation.
- Disclose any circumstances where you may be hiring or supervising a family member, friend, or someone with whom you are romantically involved.
- Not have a substantial interest in a company which is, or may be a customer, supplier or competitor of Pullman, without prior authorisation.
- Not use non-public information for personal gain, or pass such information to others, internally or externally, who do not have a legitimate need for the information.

Competition

- All employees must comply with competition and antitrust legislation
- As a business we believe in open and fair competition
- Do Not make formal or informal agreements with competitors which result in price fixing, bid collusion, market restriction or arrangements to limit supply
- Conduct business in an honest straightforward way with integrity

Working with others

- Drive to satisfy our customers through our commitment to innovation and continuous improvement
- Communicate clearly and honestly with our customers,
- Treat customers and partners fairly and with integrity and build mutually beneficial, collaborative relationships, regardless of the scale or length of our collaboration
- Ensure that all bids, contract negotiations and suppliers and partners, taking care to protect commercially sensitive information and not to disclose confidential information without prior authorisation
- Make sure that all bids, contract negotiations and communications with customers and suppliers are accurate and truthful
- Ensure all employees treat confidential information provided to us with respect and use it only for legitimate business purposes
- Fully expect that our suppliers and partners employees and their supply chains operate to the highest standards of safety, quality, inclusion, integrity, sustainability and ethical conduct
- Comply with our supplier selection processes to make sure that suppliers are chosen objectively and on merit
- Contract with customers, suppliers and partners on clear terms and conditions and operate in accordance with them
- When seeking new suppliers and partners we select those whose values and commitment to ethical business conduct and a sustainable future match our own and use objective processes and due diligence to ensure this
- Follow our quality, safety and sustainable procurement procedures to ensure the integrity of our products and services, responding to any concerns appropriately and working with our suppliers to find mutually beneficial opportunities or solutions to any problems that arise
- Take appropriate action if behaviours by suppliers or partners are contrary to the Pullman Way.
- Any form of child labour or practices which inhibit the development of children and are opposed to any employment that is not freely chosen is not permitted.
- Commit to refrain from using any form of labour that could be described as 'modern slavery' and expect the same from all those we work with.

Authentic and responsible action

- Recognise that the social, environmental and financial impacts of our business and the businesses of our customers and partners extend beyond the local and national boundaries of our operations.
- Encourage our colleagues to be aware of these wider impacts and believe that this encourages ideas and innovation on how we can contribute to addressing them in an authentic and responsible way.
- Believe that the passion and proactivity of our colleagues can positively affect the health, safety and welfare of others, our environment and communities everywhere and for the long term.
- Maintain an interest in local issues, wider trends and social responsibility
- Promote and support authentic and responsible action outside the workplace
- Feel empowered to suggest ideas and new ways of working that deliver a sustainable future.

Community engagement

- Aim to be an economic and social asset to the communities in which we operate and which we affect through our business activities
- Encourage our colleagues and partners to get involved in constructive community activity as an integral part of the way we do business, supporting our sustainability strategy and future success
- Community activities help us to attract, recruit, retain, and engage our colleagues whilst at the same time building a positive profile in the communities in which we operate
- Our company charitable contributions are appropriate and proportionate.
- Participate in fund-raising or charitable activities that you are passionate about.
- Make your manager and colleagues aware of what you are doing outside work as they may be able to support you.
- Listen carefully to requests or concerns from the community and raise them with your management team.
- Recognise that our local actions can affect communities further afield and seek to minimise the negative impacts of our operations.

Political activity

- Engage with government agencies to communicate with them on matters relating to our business
- Do not make corporate contributions or donations to political parties, causes or any associated organisations.
- Our business does not favour one political party over another
- In their own time and outside the business our colleagues may participate in party politics or make personal political donations.
- Be transparent, honest and act with integrity in all dealings with government agencies and representatives
- Only respond to consultations or engage in lobbying for our business with appropriate prior authorisation
- Always work within the applicable legislation when lobbying for our business
- Not use our business time or resources to engage in personal political activities, without specific prior authorisation
- Not use corporate funds or assets for political donation