

ROTHERFED

EMPLOYEES CODE OF CONDUCT

1.0 The Law

- 1.1 You must act at all times within the law. If in doubt seek advice from the Development Manager or Chair of the Board.

2.0 Duty to the Company and Private Interest

- 2.1 As an employee you have a duty to ensure that the company is aware of the various laws that affect its activities. This includes consideration of health and safety matters.

3.0 Disclosure of Financial and Other Interests

- 3.1 You should declare both direct and indirect financial interest (including those of a partner with whom you are living) which you have in any matter relating to the company.
- 3.2 You should list trusteeships, directorships, political office and employment in the register of interests held by the company. You should list any shareholdings in companies that you know do business with the company and details of any property in which you have a financial interest that is leased or rented by the company.
- 3.3 Non financial interests can be just as important. You should not allow the impression to be created that you are, or maybe, using your position as an employee to promote a private or personal interest, rather than forwarding the general interest of the company and helping it to achieve its objectives. Private and personal interests include those of your family and friends as well as those arising through your ethical / cultural identity, sexual orientation, membership of, or association with, clubs, societies, religious institutions and other organisations such as trade unions, political parties, pressure groups, free mason and other voluntary organisations.

4.0 Use of Confidential and Private Information

- 4.1 As an employee you may acquire information that has not been made public and is confidential. You should never disclose or use confidential information for the personal advantage of yourself or of anyone known to you, or to the disadvantage or the discredit of the company.

5.0 Gifts and Hospitality

5.1 You should be very cautious of any offer of gifts or hospitality made to you personally, particularly when a person or organisation is seeking to do business with the company.

6.0 Use of RotherFed's Facilities

6.1 You should always make sure that any facilities (such as stationery, stamps, etc) are used strictly for the duties of being an employee and for no other purpose.

Date Policy adopted: 13th October 2009

Date for Review: October 2011

Signed:

Chair of the Board