



NEX GROUP POLICY

EMPLOYMENT AND CONDUCT POLICY

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Distribution	NEX Group
Sign Off	NEX Group Board
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1 PURPOSE AND SCOPE

This policy document sets out the requirements for all parties in scope to adhere to the [Employment and Conduct Policy](#).

The intention of this policy is to set out NEX Group's approach to employment practices and to give guidance to all of our people on the standards of conduct expected of them, and which they are entitled to expect from others. This includes our approach to:

- i. Conduct expected of our people
- ii. The use of IT, Media and our standards of communication
- iii. Equal Opportunities and Diversity, Disabilities, Harassment and Bullying
- iv. Learning and Development
- v. Family Friendly
- vi. Disciplinary and Grievances
- vii. Whistleblowing
- viii. Health and Safety

The policy applies to all NEX Group officers, directors, employees (full and part-time), including those in companies where NEX Group is not sole owner but has a majority interest, consultants and contractors or temporary workers. The policy supplements, but does not replace any group company employee handbook, compliance manual or the policies contained therein or elsewhere.

The policy provides essential information regarding employment but does not form part of any contract of employment. If there is any discrepancy between this policy and an employee's contract of employment with the NEX Group, then the contract will prevail. Compliance with this policy (and the policies to which it refers), as amended from time to time, is mandatory.

NEX reserves the right to unilaterally modify, suspend or revoke this policy, or any of the policies to which it refers, in whole or in part, at any time.

2 POLICY STATEMENTS, REQUIREMENTS AND PRINCIPLES

i. Conduct expected of our people

We aim to always conduct our businesses ethically, fairly, with the highest professional standards and in strict adherence to local legal and regulatory obligations in all of the countries in which we operate.

NEX has articulated its values and seeks to ensure that our people behave in a way which reflects these values. The Performance Code toolkit also outlines the behaviours which will drive performance in our organisation. Our people are expected to behave responsibly, transparently and with respect for each other, our clients and suppliers. We take confidentiality seriously and our clients can expect that their confidential data will be treated with the utmost respect. Our people never use confidential information for their own benefit or inappropriately disclose confidential information to a third party. Even with our colleagues across the Group, we will share confidential client information only with those who have a legitimate need to know such information for internal purposes or to provide services to clients.

All of our people are expected to protect NEX Group's reputation at all times and adhere to all applicable Compliance standards, including but not limited to:

- Code of Ethics
- Treating customers fairly
- Anti-Bribery measures
- Anti Money Laundering and Prevention of Financial Crime
- Personal Account Dealing
- Conflicts of Interest
- Escalation

These standards are published within the Library section of the NEX intranet site.

ii. Use of IT, Media and Communication Standards

1. All of our people are expected to use NEX Group's IT systems appropriately in the course of their day to day work and in accordance with the Global IT Acceptable Use and Information Security policies, available within the Library section of the NEX intranet site.
2. NEX Group has a legitimate interest in, and, reserves the right to monitor its IT systems in accordance with the Global IT Acceptable Use and Information Security policies.
3. All of our people are expected to communicate with each other, our clients and suppliers in a manner appropriate to the business environment in accordance with NEX Group's Communication Standards and Social Media policies, available within the Library section of the NEX intranet site.

iii. Equal opportunity, diversity and disability, harassment and bullying

NEX is determined to create and maintain a work environment free from all forms of discrimination and harassment, and to treat our members of staff with dignity and respect.

NEX Group recognises the value of a diverse and inclusive workforce, along with its corporate and social responsibilities. We are committed to providing and promoting equal employment opportunities for all our people and applicants and to maintaining a workplace that ensures tolerance, respect, and dignity for all.

None of our people or job applicants will be discriminated against or harassed on the grounds of their:

- Disability
- Sex
- Marital or civil partnership status
- Race
- Nationality, colour, ethnic or national origins
- Religious or similar philosophical belief
- Sexual orientation
- Age
- Any other class protected by applicable law

All of our people, regardless of location, function and seniority, are expected to demonstrate sensitivity to and respect for the diversity of people with whom they work and the environments and cultures in which they operate. They are strictly prohibited from engaging in any conduct which amounts to harassment or discrimination on the grounds of sex, marital status, race, disability, age, sexual orientation or religion or similar belief. Any such breach may lead to disciplinary action as set out in section vi.

We are committed to making reasonable adjustments to accommodate those with disabilities, wherever this is possible.

iv. Learning and Development

NEX is committed to providing a supportive learning environment and enabling the continuing professional development of our people. We view learning and development holistically, recognising the importance of learning from a) experience through stretching, challenging roles and projects; b) learning from others (e.g. coaching, mentoring, subject matter experts) and c) structured learning (e.g. training programmes, webinars, e-Learning). NEX will appropriately consider supporting employees undertaking study programmes and/or professional qualifications where this is relevant to their role, in accordance with the Global Study Policy, available on the Library section of the NEX intranet site.

v. Family Friendly

NEX understands the importance of family life. We recognise all our legal obligations and, as a minimum, we are committed to complying with any and all of our statutory obligations in relation to all types of family friendly entitlements. All our employees are encouraged to speak to their manager about personal circumstances that may require the company's support.

vi. Disciplinary and Grievance:

1. All of our people are able to raise a complaint regarding any employment related concern or issue they may have, and for it be treated confidentially as far as possible. As a first step, employees are encouraged to raise any such concern or issue with any member of the NEX leadership, to seek early and informal resolution and prevent matters escalating.

2. Appropriate disciplinary action, up to and including termination may be taken against employees for misconduct of all kinds, including, but not limited to, failure to comply with NEX Group policies.
3. Any procedure relating to a grievance or disciplinary matter will be handled fairly and reasonably in accordance with our grievance and disciplinary procedures.

vii. Whistleblowing

We encourage our people to raise issues of genuine concern and to report suspected wrongdoing. NEX has a series of channels in which to do this so that we can investigate the concerns. Issues can be raised directly with a supervisor or manager, or with a representative of Legal, Compliance, or Human Resources as well as via anonymous reporting in accordance with our Whistleblowing policy/procedure, a copy of which is available within the Library section of the NEX intranet site. Details for the anonymous reporting service are set out below.

ComplianceLine is an independent, third party vendor "Listen Up Group, LLC". ComplianceLine allows employees to raise issues of concern, report suspected wrongdoing, or seek clarification on ethical dilemmas in confidence, via a toll-free hotline or secure web submission. ComplianceLine will forward employee concerns to senior management, and provide a private case number that can be used for an ongoing anonymous dialogue with the company regarding the issue. Details for contacting ComplianceLine by telephone are maintained in the Compliance library on the NEX intranet. A copy of the current set of contact details is set forth in Appendix B hereto.as follows. Reports may also be made via the ComplianceLine website at:

<http://www.mycompliancereport.com/report.asp?fid=11&cid=isna&rpt=1>

viii. Health and Safety

NEX Group is committed to providing for the health, safety and welfare of all our people.

NEX will observe all relevant regulations and codes of practice relating to Health and Safety. NEX will take account of any recommendations made by relevant Health and Safety bodies regarding health and safety issues and where appropriate will liaise with such Health and Safety bodies on health and safety issues which are of particular relevance to our people.

3 ROLES AND RESPONSIBILITIES

Specify the roles involved in the ownership, approval and implementation of the policy. E.g.

- The **owner** *Group Head of HR* is responsible and accountable for designing, issuing and implementing the policy.
- The **author** *HR Business Manager* is responsible for gathering requirements and developing the policy through to the point of publishing.
- The **approver** *NEX Group Board* ensures policy owners create effective policies in line with control requirements.

4 APPENDICES

4.1 APPENDIX A – DOCUMENT CONTROL

DOCUMENT REVIEW

Document Status	Reviewer	Position	Date
Initial Draft	<i>Harriet Oliver (R)</i>	Group Head of HR	15/12/2017
Amended Draft	<i>GOC members (R)</i>		19/01/2018
Final Draft	<i>Harriet Oliver (R)</i>	Group Head of HR	08/03/2018
Approved document	<i>NEX Board</i>		28/03/2018
Distributed document			June 2018

P=Producer, C=Contributor, R=Reviewer, A=Authoriser, I=for information only

POLICY VERSION CONTROL

Version No.	Author	Authoriser	Date	Change Description
1.0	Hannah Riches, HR Business Manager	GOC/NEX Board	June 2018	First Release

4.2 APPENDIX B – NEX COMPLIANCE LINE DIALING INSTRUCTIONS



For Argentina (Telecom), Please Have them try		0-800-555-4288
Step	Dialing Instructions for location (using mobile or land-line)	
1	Dial 0-800-555-4288 (this number is referred to as International Direct Dial Access Code)	
2	Wait for second dial tone or Listen to international operator (when he/she comes in) instruction – “dial the number you are calling”	
3	Dial 844-223-4169 (This number is referred to as US Toll Free Number)	
4	Automated voice will come on that the line is owned by ComplianceLine, Inc.	

For Argentina (Telefonica), Please Have them try		0-800-222-1288
Step	Dialing Instructions for location (using mobile or land-line)	
1	Dial 0-800-222-1288 (this number is referred to as International Direct Dial Access Code)	
2	Wait for second dial tone or Listen to international operator (when he/she comes in) instruction – “dial the number you are calling”	
3	Dial 844-223-4169 (This number is referred to as US Toll Free Number)	
4	Automated voice will come on that the line is owned by ComplianceLine, Inc.	

For Argentina (ALA Spanish speaking Intl Operator), Please Have them try		0-800-288-5288
Step	Dialing Instructions for location (using mobile or land-line)	
1	Dial 0-800-288-5288 (this number is referred to as International Direct Dial Access Code)	
2	Wait for second dial tone or Listen to international operator (when he/she comes in) instruction – “dial the number you are calling”	
3	Dial 844-223-4169 (This number is referred to as US Toll Free Number)	
4	Automated voice will come on that the line is owned by ComplianceLine, Inc.	

For Hong Kong (Hong Kong Telephone) , Please Have them try		800-96-1111
Step	Dialing Instructions for location (using mobile or land-line)	
1	Dial 800-96-1111 (this number is referred to as International Direct Dial Access Code)	
2	Wait for second dial tone or Listen to international operator (when he/she comes in) instruction – “dial the number you are calling”	
3	Dial 844-223-4169 (This number is referred to as US Toll Free Number)	
4	Automated voice will come on that the line is owned by ComplianceLine, Inc.	

For Hong Kong (New World Telephone) , Please Have them try		800-93-2266
Step	Dialing Instructions for location (using mobile or land-line)	
1	Dial 800-93-2266 (this number is referred to as International Direct Dial Access Code)	
2	Wait for second dial tone or Listen to international operator (when he/she comes in) instruction – “dial the number you are calling”	
3	Dial 844-223-4169 (This number is referred to as US Toll Free Number)	
4	Automated voice will come on that the line is owned by ComplianceLine, Inc.	

For Philippines (PLDT) , Please Have them try		1010-5511-00
Step	Dialing Instructions for location (using mobile or land-line)	
1	Dial 1010-5511-00 (this number is referred to as International Direct Dial Access Code)	
2	Wait for second dial tone or Listen to international operator (when he/she comes in) instruction – “dial the number you are calling”	
3	Dial 844-223-4169 (This number is referred to as US Toll Free Number)	
4	Automated voice will come on that the line is owned by ComplianceLine, Inc.	

For Philippines (PLDT, Tagalog speaking Intl operator) , Please Have them try		1010-5511-10
Step	Dialing Instructions for location (using mobile or land-line)	
1	Dial 1010-5511-10 (this number is referred to as International Direct Dial Access Code)	
2	Wait for second dial tone or Listen to international operator (when he/she comes in) instruction – “dial the number you are calling”	
3	Dial 844-223-4169 (This number is referred to as US Toll Free Number)	
4	Automated voice will come on that the line is owned by ComplianceLine, Inc.	

For Philippines (2nd option, Globe, Philcom, Digitel, Smart, Bayan) , Please Have them try		105-11
Step	Dialing Instructions for location (using mobile or land-line)	
1	Dial 105-11 (this number is referred to as International Direct Dial Access Code)	
2	Wait for second dial tone or Listen to international operator (when he/she comes in) instruction – “dial the number you are calling”	
3	Dial 844-223-4169 (This number is referred to as US Toll Free Number)	
4	Automated voice will come on that the line is owned by ComplianceLine, Inc.	

For Philippines (Globe, Philcom, Digitel, Smart Tagalog speaking Intl operator) , Please Have them try		105-12
Step	Dialing Instructions for location (using mobile or land-line)	
1	Dial 105-12 (this number is referred to as International Direct Dial Access Code)	
2	Wait for second dial tone or Listen to international operator (when he/she comes in) instruction – “dial the number you are calling”	
3	Dial 844-223-4169 (This number is referred to as US Toll Free Number)	
4	Automated voice will come on that the line is owned by ComplianceLine, Inc.	

For India , Please Have them try		000-117
Step	Dialing Instructions for location (using mobile or land-line)	
1	Dial 000-117 (this number is referred to as International Direct Dial Access Code)	
2	Wait for second dial tone or Listen to international operator (when he/she comes in) instruction – “dial the number you are calling”	
3	Dial 844-223-4169 (This number is referred to as US Toll Free Number)	
4	Automated voice will come on that the line is owned by ComplianceLine, Inc.	

For Singapore (SingTel) , Please Have them try		800-011-1111
Step	Dialing Instructions for location (using mobile or land-line)	
1	Dial 800-011-1111 (this number is referred to as International Direct Dial Access Code)	
2	Wait for second dial tone or Listen to international operator (when he/she comes in) instruction – “dial the number you are calling”	
3	Dial 844-223-4169 (This number is referred to as US Toll Free Number)	
4	Automated voice will come on that the line is owned by ComplianceLine, Inc.	

For Singapore (StarHub) , Please Have them try		800-001-0001
Step	Dialing Instructions for location (using mobile or land-line)	
1	Dial 800-001-0001 (this number is referred to as International Direct Dial Access Code)	
2	Wait for second dial tone or Listen to international operator (when he/she comes in) instruction – “dial the number you are calling”	
3	Dial 844-223-4169 (This number is referred to as US Toll Free Number)	
4	Automated voice will come on that the line is owned by ComplianceLine, Inc.	

For Australia (Telstra) , Please Have them try		1-800-881-011
Step	Dialing Instructions for location (using mobile or land-line)	
1	Dial 1-800-881-011 (this number is referred to as International Direct Dial Access Code)	
2	Wait for second dial tone or Listen to international operator (when he/she comes in) instruction – “dial the number you are calling”	
3	Dial 844-223-4169 (This number is referred to as US Toll Free Number)	
4	Automated voice will come on that the line is owned by ComplianceLine, Inc.	

For Australia (Optus) , Please Have them try		1-800-551-155
Step	Dialing Instructions for location (using mobile or land-line)	
1	Dial 1-800-551-155 (this number is referred to as International Direct Dial Access Code)	
2	Wait for second dial tone or Listen to international operator (when he/she comes in) instruction – “dial the number you are calling”	
3	Dial 844-223-4169 (This number is referred to as US Toll Free Number)	
4	Automated voice will come on that the line is owned by ComplianceLine, Inc.	

For Japan (KDDI) , Please Have them try		00-539-111
Step	Dialing Instructions for location (using mobile or land-line)	
1	Dial 00-539-111 (this number is referred to as International Direct Dial Access Code)	
2	Wait for second dial tone or Listen to international operator (when he/she comes in) instruction – “dial the number you are calling”	
3	Dial 844-223-4169 (This number is referred to as US Toll Free Number)	
4	Automated voice will come on that the line is owned by ComplianceLine, Inc.	

For Japan (Softbank Telecom) , Please Have them try		00-663-5111
Step	Dialing Instructions for location (using mobile or land-line)	
1	Dial 00-663-5111 (this number is referred to as International Direct Dial Access Code)	
2	Wait for second dial tone or Listen to international operator (when he/she comes in) instruction – “dial the number you are calling”	
3	Dial 844-223-4169 (This number is referred to as US Toll Free Number)	
4	Automated voice will come on that the line is owned by ComplianceLine, Inc.	

For Japan (NTT) , Please Have them try		0034-811-001
Step	Dialing Instructions for location (using mobile or land-line)	
1	Dial 0034-811-001 (this number is referred to as International Direct Dial Access Code)	
2	Wait for second dial tone or Listen to international operator (when he/she comes in) instruction – “dial the number you are calling”	
3	Dial 844-223-4169 (This number is referred to as US Toll Free Number)	
4	Automated voice will come on that the line is owned by ComplianceLine, Inc.	

For Germany, Please Have them try		0-800-225-5288
Step	Dialing Instructions for location (using mobile or land-line)	
1	Dial 0-800-225-5288 (this number is referred to as International Direct Dial Access Code)	
2	Wait for second dial tone or Listen to international operator (when he/she comes in) instruction – “dial the number you are calling”	
3	Dial 844-223-4169 (This number is referred to as US Toll Free Number)	
4	Automated voice will come on that the line is owned by ComplianceLine, Inc.	

For France (Hotels 1), Please Have them try		0-800-99-1011
Step	Dialing Instructions for location (using mobile or land-line)	
1	Dial 0-800-99-1011 (this number is referred to as International Direct Dial Access Code)	
2	Wait for second dial tone or Listen to international operator (when he/she comes in) instruction – “dial the number you are calling”	
3	Dial 844-223-4169 (This number is referred to as US Toll Free Number)	
4	Automated voice will come on that the line is owned by ComplianceLine, Inc.	

For France (Hotels 2), Please Have them try		0-800-99-1111
Step	Dialing Instructions for location (using mobile or land-line)	
1	Dial 0-800-99-1111 (this number is referred to as International Direct Dial Access Code)	
2	Wait for second dial tone or Listen to international operator (when he/she comes in) instruction – “dial the number you are calling”	
3	Dial 844-223-4169 (This number is referred to as US Toll Free Number)	
4	Automated voice will come on that the line is owned by ComplianceLine, Inc.	

For France (Hotels 3), Please Have them try		0-800-99-1211
Step	Dialing Instructions for location (using mobile or land-line)	
1	Dial 0-800-99-1211 (this number is referred to as International Direct Dial Access Code)	
2	Wait for second dial tone or Listen to international operator (when he/she comes in) instruction – “dial the number you are calling”	
3	Dial 844-223-4169 (This number is referred to as US Toll Free Number)	
4	Automated voice will come on that the line is owned by ComplianceLine, Inc.	

For France (Hotels – Paris Only), Please Have them try		0-800-99-0111
Step	Dialing Instructions for location (using mobile or land-line)	
1	Dial 0-800-99-0111 (this number is referred to as International Direct Dial Access Code)	
2	Wait for second dial tone or Listen to international operator (when he/she comes in) instruction – “dial the number you are calling”	
3	Dial 844-223-4169 (This number is referred to as US Toll Free Number)	
4	Automated voice will come on that the line is owned by ComplianceLine, Inc.	

For France (France Telecom), Please Have them try		0-800-99-0011
Step	Dialing Instructions for location (using mobile or land-line)	
1	Dial 0-800-99-0011 (this number is referred to as International Direct Dial Access Code)	
2	Wait for second dial tone or Listen to international operator (when he/she comes in) instruction – “dial the number you are calling”	
3	Dial 844-223-4169 (This number is referred to as US Toll Free Number)	
4	Automated voice will come on that the line is owned by ComplianceLine, Inc.	

For France (Telecom Development), Please Have them try		0-805-701-288
Step	Dialing Instructions for location (using mobile or land-line)	
1	Dial 0-805-701-288 (this number is referred to as International Direct Dial Access Code)	
2	Wait for second dial tone or Listen to international operator (when he/she comes in) instruction – “dial the number you are calling”	
3	Dial 844-223-4169 (This number is referred to as US Toll Free Number)	
4	Automated voice will come on that the line is owned by ComplianceLine, Inc.	

For Switzerland, Please Have them try		0-800-890011
Step	Dialing Instructions for location (using mobile or land-line)	
1	Dial 0-800-890011 (this number is referred to as International Direct Dial Access Code)	
2	Wait for second dial tone or Listen to international operator (when he/she comes in) instruction – “dial the number you are calling”	
3	Dial 844-223-4169 (This number is referred to as US Toll Free Number)	
4	Automated voice will come on that the line is owned by ComplianceLine, Inc.	

For United Kingdom (British Telecom), Please Have them try		0-800-89-0011
Step	Dialing Instructions for location (using mobile or land-line)	
1	Dial 0-800-89-0011 (this number is referred to as International Direct Dial Access Code)	
2	Wait for second dial tone or Listen to international operator (when he/she comes in) instruction – “dial the number you are calling”	
3	Dial 844-223-4169 (This number is referred to as US Toll Free Number)	
4	Automated voice will come on that the line is owned by ComplianceLine, Inc.	

For United Kingdom (C & W), Please Have them try		0-500-89-0011
Step	Dialing Instructions for location (using mobile or land-line)	
1	Dial 0-500-89-0011 (this number is referred to as International Direct Dial Access Code)	
2	Wait for second dial tone or Listen to international operator (when he/she comes in) instruction – “dial the number you are calling”	
3	Dial 844-223-4169 (This number is referred to as US Toll Free Number)	
4	Automated voice will come on that the line is owned by ComplianceLine, Inc.	

For Sweden, Please Have them try		020-799-111
Step	Dialing Instructions for location (using mobile or land-line)	
1	Dial 020-799-111 (this number is referred to as International Direct Dial Access Code)	
2	Wait for second dial tone or Listen to international operator (when he/she comes in) instruction – “dial the number you are calling”	
3	Dial 844-223-4169 (This number is referred to as US Toll Free Number)	
4	Automated voice will come on that the line is owned by ComplianceLine, Inc.	

For Israel (Bezeq), Please Have them try		1-80-949-4949
Step	Dialing Instructions for location (using mobile or land-line)	
1	Dial 1-80-949-4949 (this number is referred to as International Direct Dial Access Code)	
2	Wait for second dial tone or Listen to international operator (when he/she comes in) instruction – “dial the number you are calling”	
3	Dial 844-223-4169 (This number is referred to as US Toll Free Number)	
4	Automated voice will come on that the line is owned by ComplianceLine, Inc.	

For Israel (Golden Lines), Please Have them try		1-80-922-2222
Step	Dialing Instructions for location (using mobile or land-line)	
1	Dial 1-80-922-2222 (this number is referred to as International Direct Dial Access Code)	
2	Wait for second dial tone or Listen to international operator (when he/she comes in) instruction – “dial the number you are calling”	
3	Dial 844-223-4169 (This number is referred to as US Toll Free Number)	
4	Automated voice will come on that the line is owned by ComplianceLine, Inc.	

For Israel (Barak), Please Have them try		1-80-933-3333
Step	Dialing Instructions for location (using mobile or land-line)	
1	Dial 1-80-933-3333 (this number is referred to as International Direct Dial Access Code)	
2	Wait for second dial tone or Listen to international operator (when he/she comes in) instruction – “dial the number you are calling”	
3	Dial 844-223-4169 (This number is referred to as US Toll Free Number)	
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