

CODE OF CONDUCT

April 2024

NEW RIVER

NEW
RIVER

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INTRODUCTION



Our Code of Conduct provides guidance as to how everyone at NewRiver can ensure they act with the highest standards of integrity and summarises the key policies that all employees must follow.

This Code of Conduct complements our Staff Handbook, which provides further details and guidance in respect of each of the policies contained in this Code, and which has been in place since 2019.

Unless otherwise indicated, the policies and procedures set out in this Code apply to all employees of NewRiver.

All managers have a specific responsibility to operate in accordance with the provisions of this Code, ensure that all staff understand the standards of behaviour expected of them and to take action if behaviour falls below these requirements.

Those working at a management level have a specific responsibility to lead by example and to ensure that those they manage promote our objectives with regard to equal opportunities.

All staff must ensure that they are familiar with, comply with, and support the aims of this code.

This code was approved by the Board in April 2024.

WORKPLACE BEHAVIOUR

RESPONSIBLE STANDARDS OF CONDUCT



While working at NewRiver you should, at all times, maintain professional and responsible standards of conduct. You should observe the terms and conditions of your contract; observe all our policies, procedures and regulations; take reasonable care in respect of the health and safety of colleagues and third parties; comply with all reasonable instructions given by managers; and always act in good faith and in the best interests of the Company, its customers and staff.

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

Misconduct

Matters regarded as misconduct - where behaviour falls short of the high standards and integrity expected of all our employees - will be dealt with under our Disciplinary Procedure. Such matters may include minor breaches of any of our policies or of your contract.

Gross Misconduct

Gross misconduct is a serious breach of contract and includes misconduct which, in our opinion, is likely to prejudice our business or reputation, or irreparably damage the working relationship and trust between employer and employee.

Gross misconduct will be dealt with under our Disciplinary Procedure and will normally lead to dismissal. Such matters regarded as gross misconduct may include fraud or forgery or other dishonesty; bullying, discrimination or harassment; serious or repeated breach of health and safety rules; unauthorised use or disclosure of confidential information or failure to ensure that confidential information in your possession is kept secure; any breach of the Bribery Policy; or a breach of the Share Dealing Code. This list is intended as a guide and is not exhaustive.

Disciplinary Procedure

The aims of the Disciplinary Procedure and its associated Disciplinary Rules are set out in the Staff Handbook.

It is our policy to ensure that any disciplinary matter is dealt with fairly and that steps are taken to establish the facts and to give employees the opportunity to respond before taking any formal action.

WORKPLACE BEHAVIOUR

ANTI-HARASSMENT AND BULLYING POLICY

We are committed to providing a working environment free from harassment and bullying and ensuring all staff are treated, and treat others, with dignity and respect.

Our policy covers harassment or bullying which occurs at work and out of the workplace, such as on business trips or at work-related events or social functions. It covers bullying and harassment by staff (which may include consultants, contractors and agency workers) and also by third parties such as customers, suppliers or visitors to our premises.

What is Harassment?

Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment.

What is Bullying?

Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority but can include both personal strength and the power to coerce through fear or intimidation.

If you are being harassed or bullied

We will investigate complaints in a timely and confidential manner. The investigation will be conducted by someone with appropriate experience and no prior involvement in the complaint, where possible. Details of the investigation and the names of the person making the complaint and the person accused must only be disclosed on a "need to know" basis. We will consider whether any steps are necessary to manage any ongoing relationship between you and the person accused during the investigation.

Protection and support for the person involved

Staff who make complaints or participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under our Disciplinary Procedure.

WORKPLACE BEHAVIOUR

ANTI-BRIBERY POLICY



It is our policy to conduct business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate; implementing and enforcing effective due diligence and risk assessment systems to counter bribery and corruption, of which our Board has ultimate oversight. To support these processes, we require staff to uphold the following approach to anti-bribery.

What is a Bribe?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

Hospitality and Gifts

This policy does not prohibit reasonable and appropriate hospitality (given and received) to or from third parties for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services. However, all staff must abide by the following controls and internal record keeping requirements.

Staff may accept and do not need to record gifts or hospitality received and offered under £25, subject to the expenses policy. A written record must be kept of all gifts or hospitality accepted, or offered, with a value of £25-£100. Written line manager approval is required for gifts or hospitality with a value of over £100.

WORKPLACE BEHAVIOUR

ANTI-BRIBERY POLICY CONTINUED



Executive Committee members should seek authority from the COO for any gifts or hospitality received or offered over £250.

Quarterly returns of written gifts and hospitality records will be requested by the Company Secretary, and staff must ensure all expenses claims relating to hospitality, gifts or expenses are submitted in accordance with our expenses policy, specifically recording the reason for the expenditure.

No gift or hospitality will be appropriate if it is unduly lavish or extravagant or could be an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).

Donations

No donation (whether to charity or otherwise) must be offered or made without the prior approval of the Chief Operating Officer or the Executive Committee. For the avoidance of doubt, the Company does not make contributions to political parties.

Effect of Breach

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

EQUAL OPPORTUNITIES AT NEWRIVER

NewRiver is fully committed to equal opportunities for all staff and applicants. We aim to create a culture that encourages and values diversity and that appoints, rewards and promotes staff based on merit. We adopt a strict Equal pay for Equal Work policy and pay above the Living Wage for all roles within our business. Recognising the benefits to employee welfare, employee retention, and to aid the elimination of excessive working hours, we offer many forms of flexible working including job share, annualised hours, variation of hours and working from home, which we believe to further support equality of opportunity.

We do not discriminate against staff on the basis of their gender, sexual orientation, marital or civil partner status, gender reassignment, race, pregnancy and maternity, religion or belief, disability or age. The principle of non-discrimination and equality of opportunity applies equally to the treatment of former staff, visitors, clients, customers and suppliers by members of our current workforce. We are committed to a programme of action to make our policy effective and to bring it to the attention of all staff.

Our policy applies to the advertising of jobs and recruitment and selection, to training and development, opportunities for promotion, to conditions of service, benefits and facilities and pay, to health and safety and to conduct at work, to grievance and disciplinary procedures and to termination of employment. We will take appropriate steps to accommodate the requirements of our staff's religions, cultures, and domestic responsibilities.

Recruitment and Selection

Individuals should be treated on the basis of their relevant experience and abilities and job selection criteria should be regularly reviewed to ensure that they are appropriate for the effective performance of the job and therefore justified on non-discriminatory grounds.

Vacancy advertisements shall include an appropriate short statement on our Equal Opportunities Policy and a copy of this policy shall be sent to those who enquire about vacancies.

Applicants should not be asked about health or disability before a job offer is made. There are limited exceptions which should only be used with the approval of the Chief People Officer.

EQUAL OPPORTUNITIES AT NEWRIVER

CONTINUED



Applicants should not be asked about past or current pregnancy or future intentions related to pregnancy. Applicants should not be asked about matters concerning age, race, religion or belief, sexual orientation, or gender reassignment without the approval of the Chief People Officer.

Staff training, promotion and conditions of service

Staff training needs are identified through regular staff appraisals. All staff will be given appropriate access to training to enable them to progress within the organisation and all promotion decisions will be made on the basis of merit.

The composition and movement of staff at different levels will be regularly monitored to ensure equality of opportunity at all levels of the organisation. Where appropriate, steps will be taken to identify and remove unnecessary or unjustifiable barriers and to provide appropriate facilities and conditions of service to meet the special needs of disadvantaged or underrepresented groups.

Disability discrimination

If you are disabled, or become disabled, you are encouraged to tell us about your condition. This is to enable us to support you as much as possible.

We monitor the physical features of our premises to consider whether they place disabled staff, job applicants or service users at a substantial disadvantage compared to other staff. Where possible and proportionate, we will take steps to improve access for disabled staff and service users.

WORKING WITH NEWRIVER

Forced and compulsory labour prevention

In line with the Forced Labour Convention (No 29 of the International Labour Organization's 8 ILO conventions), NewRiver REIT plc is ensuring that there is no child labour, modern slavery or human trafficking in our supply chains or in any part of our business. This includes suppliers, contractors and any other organisation with which we do business.

As part of our initiative to identify and mitigate risk, we have procedures to:

- Identify and assess, and mitigate against, potential risk areas in our own business within our recruitment process and in our appointment of contractors
- Identify and assess, and mitigate against, potential risk areas in our supply chains

Worker rights

All employees are entitled to a workplace free from bullying, intimidation, harassment or victimisation. All employees should be treated with respect and dignity. Our suppliers, their subcontractors and their business partners are strictly banned from resorting to humiliating employees or using corporal punishment, and no employee shall be subject to physical, psychological or verbal harassment. Migrant employees have the same rights as local employees.

In accordance with ILO Conventions 87, 98 and 135, all employees have the right to form or join associations of their own choosing and to bargain collectively. NewRiver respects these rights, therefore any disciplinary or discriminatory actions by the employer against employees who choose to peacefully and lawfully organise or join an association will not be accepted.

SPEAKING UP AT NEWRIVER

Whistleblowing Policy

We are committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards. However, all organisations face the risk that they fall below the high standards they expect, from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur. The aims of our policy are:

- To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- To provide staff with guidance as to how to raise those concerns.
- To reassure staff that they are able to raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken.

Raising a Concern

We hope that in many cases, staff will be able to raise concerns with their line managers. If this is inappropriate for any reason, the Chief People Officer or the Company Secretary are able to support. Alternatively, the Company Secretary can share contact details of a Senior Independent Non-Executive director who will address any concerns.

We will arrange a meeting as soon as possible to discuss raised concerns. A colleague or union representative may be requested to be present in any meetings. We will take down a written summary of all concerns and provide a copy after the meeting. We will also aim to provide an indication of how we propose to deal with the matter.

SPEAKING UP AT NEWRIVER



Confidentiality, Protection and Support

We hope that staff will feel able to voice whistleblowing concerns openly. However, if they wish to raise their concern confidentially, we will make every effort to conceal their identity.

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns in good faith, even if they turn out to be mistaken.

Staff must not suffer any detrimental treatment as a result of raising a concern in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

Staff must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

HEALTH & SAFETY AT NEWRIVER

We are committed to ensuring the health and safety of our staff and clients and to providing a safe environment for all those attending our premises.

In particular we are committed to maintaining safe and healthy working conditions through control of the health and safety risks arising from our work activities, provision and maintenance of safe plant and equipment and taking steps to prevent accidents and cases of work-related ill health.

We are committed to implementing environmental, social and governance (ESG) policies into our workforce, with a particular focus on empowering our employees.

Full details of our health & safety policies and procedures are available in the Staff Handbook.

Standards of workplace behaviour

You must co-operate with the Principal Health and Safety Officer, supervisors and managers on health and safety matters and comply with any health and safety instructions. You must take reasonable care of your own health and safety and that of others by observing safety rules applicable to you and following instructions for the use of equipment.

Equipment

All staff must use equipment in accordance with operating instructions, instructions given by managers and any relevant training. Any fault with, damage or concern must immediately be reported to the Principal Health and Safety Officer.

HEALTH & SAFETY AT NEWRIVER

Accidents and first aid

Any accident at work involving personal injury should be reported to the Principal Health and Safety Officer. All staff must cooperate with any resulting investigation. Details of first aid facilities and trained first aiders are available from the Principal Health and Safety Officer.

National health alerts

In the event of an epidemic or pandemic alert we will organise our business operations and provide advice on steps to be taken by staff, in accordance with official guidance, to reduce the risk of infection at work as far as possible.

Emergency evacuation and fire precautions

You should familiarise yourself with the instructions about what to do in the event of fire which are displayed on notice boards. You should also know where the fire extinguishers are, and ensure that you are aware of your nearest fire exit and alternative ways of leaving the building in an emergency.

Risk assessments, DSE and manual handling

General workplace risk assessments are carried out when required or as reasonably requested by members of staff or management. Managers are responsible for ensuring that any necessary risk assessments are undertaken and that recommended changes to the workplace and working practices are implemented.

WELLBEING AT NEWRIVER



No-smoking policy

We are committed to protecting your health, safety and welfare and that of all those who work for us by providing a safe place of work and protecting all workers, service users, customers and visitors from exposure to smoke.

All of our workplaces are smoke-free and all staff and visitors have a right to a smoke-free environment.

Our no-smoking policy complies with the Health Act 2006 and associated regulations. We are committed to a programme of action to make this policy effective and to bring it to the attention of all staff.

Stress policy

We are committed to protecting your health, safety and well-being and that of all those who work for us. We will endeavour to maintain a working environment in which everyone treats one another with dignity and respect and is able to co-operate with and trust their colleagues.

We recognise that, whatever its source, stress is a health and safety issue in the workplace. We acknowledge the importance of a supportive environment and working culture and of identifying and reducing workplace stressors.

We are committed to a programme of action to make this policy effective and to bring it to everyone's attention. However, this policy can only be effective if everyone co-operates to achieve its aims.

We have trained Mental Health First Aiders available to provide confidential support. We also have, through our Wellness programme, access to Mental Health Support Services. Full details are available on our Employee Benefits Portal.

We have a legal duty to take reasonable care to ensure that your health is not put at risk by excessive pressures or demands arising from the way work is organised.

Our policy takes account of our obligations under the Health and Safety at Work etc Act 1974, Management of Health and Safety at Work Regulations 1999, Employment Rights Act 1996, Protection from Harassment Act 1997, Working Time Regulations 1998 and Equality Act 2010.

ELECTRONIC COMMUNICATIONS AT NEWRIVER

Our electronic communications systems and equipment are intended to promote effective communication and working practices within our organisation, and are critical to the success of our business.

Our full policy forms part of our Staff Handbook and deals mainly with the use (and misuse) of computer equipment, e-mail, the internet, telephones, smartphones, tablets, personal digital assistants (PDAs) and voicemail, but it applies equally to the use of copiers, scanners, CCTV, and electronic key fobs and cards. It outlines the standards we require users of these systems to observe, the circumstances in which we will monitor use of these systems and the action we will take in respect of breaches of these standards.

All staff are expected to protect our electronic communications systems and equipment from unauthorised access and harm at all times, and to follow all data security procedures. Failure to do so may be dealt with under our Disciplinary Procedure and, in serious cases, may be treated as gross misconduct.

CONTACTS

Please direct any queries on this Code to:

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