



Code of Honour  
Standards of Conduct  
Leading With High Integrity



Dear Teammates,

Strong relationships are built on Trust, Honesty and Open Communication - as are great Teams! Since 2003 The Stress Management Society has earned its reputation as trusted partner to our clients and everyone that works with and collaborates with us. This has been achieved by our commitment to honesty, integrity and ethical conduct. Our organisation is built on trust and our reputation. It influences how customers feel about our products and services, and how partners and key stakeholders perceive us.

Today, more than ever, in a global business environment where information is communicated in an instant and accessible by anyone in the world, we need the continued trust of our teammates, trainers, consultants, associates, customers, business partners, media partners and the communities in which we work if we are to continue to thrive and grow.

The lessons of large corporate failures in recent times make clear that even great companies with longstanding reputations for integrity and trust can be destroyed overnight by a single inappropriate or unethical act. As a small and rapidly expanding company, our reputation is a crucial part of our continued success.

Because our success is so closely related to our reputation, it's up to all of us to protect that reputation. Remember, it takes years to build a reputation and a few seconds to ruin it.

Acting with integrity is about more than our image and reputation, or avoiding legal issues. It's about creating and sustaining a place where we all are proud to work. Ultimately, it's about each of us knowing that we have done the right thing. This means acting honestly and treating each other, our customers, partners, suppliers and members fairly, and with dignity.

Our Code of Honour is our guide to appropriate conduct. Together with other Company guidelines, we have set standards to ensure that we all do the right thing. Keep the Code with you and refer to it often. I ask every teammate, manager, trainer and director to commit to uphold the standards of conduct in this Code. The Code of Honour is designed to present our ethical guidelines in clear and simple language, accompanied by some real-life examples.

If/when you have questions, ask a Senior Manager for guidance. With your help, I am confident that The Stress Management Society will continue to deserve the trust that everyone has in us. Our reputation for integrity will endure, and will continue to go from strength to strength.

Thank you for joining me in this effort.

Neil Shah - Chief De-Stressing Officer



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# OUR CODE OF HONOUR



Why does The Stress Management Society have a Code of Honour?

The Code of Honour (sometimes referred to as ‘the Code’) stands for our commitment in everything we do to comply with all applicable legal requirements and the highest ethical standards. To help us meet this commitment, the Code sets forth what we expect of all our teammates and directors when performing their job responsibilities and conducting business on behalf of The Stress Management Society. In addition to describing the standards of business conduct at The Stress Management Society, the Code of Honour is the foundation that supports a positive, respectful and ethical work environment for all of our teammates.

WHO MUST FOLLOW THE CODE?

Every teammate and director must follow the requirements of our Code of Honour and should consult the Code for guidance when acting on behalf of The Stress Management Society. New teammates and board members are required to acknowledge acceptance of the Code’s terms as a condition of initial employment or service. Annually thereafter, each director and teammate is required to review and renew his or her commitment to the spirit and letter of the Code of Honour.

Teammates who engage contractors, agents or consultants to work on behalf of the Company should seek to ensure that these parties are made aware of the Code of Honour.

WHO ADMINISTERS THE CODE?

Our chief executive officer has the primary responsibility to oversee compliance with the Code of Honour. However, all those in management/supervisory positions of the Company assist in the general implementation and administration of these standards and have enhanced responsibility to model, promote and monitor compliance with the requirements of the code. The company’s Senior Management Team is responsible for interpreting and determines compliance with the Code as it applies to teammates, while the chief executive office or finance director makes these decisions with respect to directors and senior managers.

WHAT IF I HAVE QUESTIONS ABOUT INTERPRETATIONS OF THE CODE?

Every situation or decision you face may not be squarely addressed by the Code of Honour. The Code must be applied in combination with the exercise in good judgement. You are strongly encouraged to talk to your line manager, a senior manager or a director when in doubt about the best course of action in a particular situation. All requests will be kept strictly confidentiality.



## WHAT IF I SUSPECT A VIOLATION OF THE CODE?

You are responsible for bringing the Company's attention to any circumstances that you believe in good faith may constitute a violation of the Code of Honour. Failure to report a suspected violation can put you, your teammates and The Stress Management Society at major risk. If you are not sure whether to speak up about a particular situation, ask yourself the following questions;

- Is the issue you are concerned about legal?
- Does it comply with the Code of Honour?
- What would your manager, colleagues or family members think about the issue?
- How would the issue look if reported in the newspaper?
- Does it feel right?

Although you may be hesitant to report a potential Code of Honour issue because you don't want to get someone "in trouble", hurt someone's reputation or you fear that someone will "get back" at you, teammates who come forward with concerns play an important role in maintaining our ethical workplace and reputation. You have a responsibility to share information so that the Company can respond quickly and take appropriate action. In addition, as described below, you may not be retaliated against for reporting a suspected Code violation in good faith and can make your reports anonymously.

If you have any doubts about compliance, you are strongly encouraged to seek advice from your line manager, a senior manager or a director. Our commitment to honesty and integrity means we must never ignore a potential legal or ethical issue that needs to be addressed.

## CAN ANYTHING HAPPEN TO ME FOR REPORTING A SUSPECTED VIOLATION?

The Stress Management Society will not tolerate retaliation against anyone who in good faith seeks advice, raises a concern or reports a suspected violation of the Code. This means that you cannot lose your job or benefits, be demoted, suspended, threatened, harassed or discriminated against for raising a Code of Honour concern in good faith or participating in a Company investigation. Reporting suspected violations is following our Code of Honour and is doing the right thing. Anyone who retaliates against individuals who report suspected misconduct will be subject to disciplinary action up to and including termination from employment. If you suspect you or another teammate has been retaliated

**Q:** My supervisor did something that seemed unethical under our Code of Honour, but I'm afraid to report the suspected violation. Will I get in trouble or hurt my supervisor's reputation by reporting my concern?

**A:** No, you cannot get in trouble or hurt your supervisor's reputation by making a report. You will not be held responsible for reports made honestly and in good faith, even if they turn out to be unfounded. Investigations are conducted in an objective, fair and confidential way to ensure that teammates' reputations are protected.



## WHAT ARE THE PROCEDURES FOR REPORTING A SUSPECTED CODE VIOLATION?

In the first instance you should report violations to a senior manager or a director incidents involving improper, illegal or discriminatory conduct. In addition, those who wish to make a report in writing should address it to the chief executive officer. You are also encouraged to contact a director to report acts of fraud or other improper activities, if you have a question

about the Code or need advice on how to comply with it in a given situation. Your communications with any directors will be treated confidentially. Information regarding suspected violations of the Code may be reported verbally or in writing.

## WHAT HAPPENS AFTER I REPORT A SUSPECTED CODE VIOLATION?

Reports of suspected violations will be promptly investigated. Complaints relating to any apparent or suspected violation involving the Company's financial reporting or internal financial controls will be referred directly to the financial director. Complaints relating to matters other than accounting and financial controls will be referred to the directors for further investigation.

The investigations are conducted in a confidential manner and typically involve an examination of relevant records and interviews of persons who may have knowledge of the facts related to the reported concern or issue. Most investigations take several weeks before conclusions are reached. You should not expect to be informed about the status or results of an investigation. It is not the policy of the Company to disclose the results of the investigation to the reporter. To the extent improper conduct in violation of the Code was found to have occurred, appropriate action will be taken. Every report is investigated and all investigation results are reviewed in confidence by the directors on a quarterly basis to ensure that proper procedures were followed in the investigation and disposition of each report.

## WHAT ARE THE CONSEQUENCES OF VIOLATING THE CODE?

Violation of the Code of Honour by any teammate may result in a variety of disciplinary actions, including termination from employment. With respect to any violation of the Code of Honour by a director, the Board will take such action as it deems appropriate in the best interests of the Company.

Disciplinary action by the Company is in addition to any civil or criminal liability and penalties that may result from illegal conduct. All violations of these standards of conduct warranting disciplinary action, whether or not related to financial or accounting matters, will be reported to the Audit Committee of the Board of Directors.



## COMPLIANCE WITH THE LAW

The most fundamental promise of our Code of Honour is the requirement that all The Stress Management Society teammates and directors comply fully with applicable laws, rules and regulations of all levels of government. The Company is subject to a variety of laws and regulations covering everything from workplace safety to fair competition to information disclosure. In addition to compliance with legal requirements, however, the Code of Honour requires teammates to adhere to policies of honesty, integrity and ethics in the performance of all services on behalf of the Company.

# Workplace Conduct

## DIVERSITY IN THE WORKPLACE; EQUAL OPPORTUNITY EMPLOYMENT

Each of our teammates contributes to the success of our Company and, only by working together and drawing upon our diverse talents and perspectives, can we continue to succeed in a constantly changing world.

The Stress Management Society is committed to a policy of equal opportunity employment, including the prohibition of all forms of illegal discrimination. This means that teammates are recruited, selected, developed and advanced on merit, without regard to race, colour, religion, gender, age, national origin, sexual orientation, gender identity, marital status, disability or any other characteristic protected by law. We expect all teammates to treat each other with respect and dignity to support a work environment in which diversity and inclusion are valued.

## A HARASSMENT-FREE WORKPLACE

The Stress Management Society is committed to continuously building and maintaining a workplace that is safe and professional and that supports and encourages teamwork and trust. Every teammate at The Stress Management Society is entitled to fair treatment, courtesy and respect.

We will not tolerate any form of abuse or harassment in the workplace towards teammates, contractors, suppliers, customers or others. No teammate should engage in any of the following types of behaviour:

- Offensive, intimidating, threatening, malicious or insulting behaviour
- Behaviour that could be characterized as sexual harassment (i.e. unwelcome sexual advances or requests, physical contact or repeated sexual suggestions)



- Behaviour that has the intent or effect of creating a hostile or intimidating work environment or interfering with work performance
- Making racial, ethnic, religious, age-related or sexual jokes or insults
- Distributing or displaying offensive material, including inappropriate pictures, cartoons or internet videos

## SAFETY IN THE WORKPLACE

In an effort to ensure a safe and healthy workplace, The Stress Management Society has a safety program that applies and includes appropriate safety guidelines and training in compliance with applicable laws and regulations, as well as our own policies. Each of our teammates is expected to adhere to applicable laws, regulations, and policies that relate to health and safety in the workplace. If you observe or experience an accident, injury or unsafe practice or condition, you must immediately notify your supervisor so that the situation can be effectively managed and remedied.

## CONFIDENTIAL INFORMATION

All Company records and information relating to the Company, its customers, suppliers and teammates is confidential. Generally speaking, no teammate or director of the Company may provide or disclose confidential or proprietary information to anyone outside the Company (or even within the Company except to teammates who need to know such information to perform their work) or use such information other than in conducting the Company's business. In certain situations, it may be permissible to disclose or provide confidential information to persons having a legitimate need for it in the ordinary course of the Company's business or as may otherwise be required by law.

Confidential or proprietary information is any information that has not been disclosed to the public and includes, by way of example:

- Teammate personnel files and records, including information relating to a teammate's compensation, employment status, performance, etc.
- Customer lists, contracts, pricing and purchase information
- Supplier lists, contracts, pricing and product information
- All written or verbal agreements between the Company and its teammates, customers, suppliers, strategic partners, agents and other third parties
- Intellectual property and trade secrets, including our program offerings and contract forms, as well as trademarks and copyrights
- Company financial information, including actual results, budget or forecast projections and incentive program targets
- Financial and other information about potential acquisitions or strategic business relationships
- Sensitive information regarding Customer projects
- Proposed or contemplated Company investments
- Company studies and reports of a confidential nature.



**Q:** My supervisor sometimes acts in a way that makes me feel intimidated and embarrassed by repeatedly and loudly criticising my work, sometimes in front of other teammates, and often using profanity or other inappropriate language. What can I do about this?

**A:** Effective leadership requires that managers talk with teammates about their job performance. Managers should be clear about how each teammate is performing and how the teammate's overall behaviour contributes to the team's ability to deliver results consistent with the Company's values and expectations. Constructive criticism and supervisory actions regarding performance deficiencies or other workplace issues are not harassment or retaliation. However, such issues should be addressed professionally and respectfully by your supervisor outside the presence of other teammates and should not include any profanity or other inappropriate language. If you are not comfortable discussing your supervisor's behaviour with him or her directly, you can speak about the matter in confidence to a senior manager or director.

Confidential information also includes information that the Company has agreed to receive on a confidential basis from other companies or individuals. It is important to note that your obligation to maintain the confidentiality of confidential Company information continues even after your employment by or service to the Company ends.

In addition, please keep in mind that you should not disclose confidential Company, supplier or customer information to other teammates within the Company unless there is a reason that they need to have the confidential information to perform their job functions. Teammates working in certain areas of the Company need to be especially vigilant about sharing certain confidential information with teammates who work in other areas of the Company where such information might create a conflict of interest or raise ethical issues. For example, a teammate who has access to Company financial data should not share that information with or comment on that information to other teammates who don't have access to that information in the performance of their job responsibilities.

**Q:** A fellow teammate contacted me and asked if I could use my access to payroll files to give her the address of a former teammate who recently left the Company. She heard that the teammate is sick and wants to send him a "get well" card. This seems pretty innocuous, so can I provide the requested information?

**A:** No, you may not use your Company access to personal teammate information for the purpose of providing an address, phone number or any other personal information of a teammate, regardless of the reason. Your access to confidential information relating to the Company and its teammates may be used only in connection with the performance of your legitimate job responsibilities and for no other purpose.

Accessing and/or disclosing private teammate information for any purpose outside of the performance of your legitimate job responsibilities is a violation of confidentiality and, depending on the information, may be a violation of the law as well.



# Conflicts of Interest

## GENERAL CONFLICTS OF INTEREST

All teammates and directors must avoid any investments, business interests or other associations that interfere with or influence, or even appear to interfere with or influence, their objective judgment in acting in the Company's best interests. A conflict of interest arises when your judgment in acting on the Company's behalf is, or may be, influenced by an actual or potential personal benefit to you or a family member or from an investment, business interest or some other association. The improper benefits may be financial or non-financial, direct or indirect, through family connections, personal associations or otherwise. For purposes of these standards of conduct, "family members" include spouses, parents, children, siblings, mothers and fathers-in-law, sons and daughters-in-law, brothers and sisters-in-law, and anyone else who shares the home.

Below are some examples of actual or potential conflicts of interest:

### Outside Employment

- You have outside employment or business interests that may interfere with your ability to do your job at The Stress Management Society
- You conduct a "side business" with a Company customer, supplier, vendor or contractor
- You or a family member is employed by, provides services for or receives payment from any competitor, supplier or customer of The Stress Management Society

### Financial Interests

- You or a family member has an investment or other financial interest in a privately-owned competitor, supplier or customer of the Company
- You or a family member owns more than 1% of the stock of any publicly-held competitor, supplier or customer of the Company

### Public Service

- You raise money or perform services for a charity during working hours (Except where sponsored by The Stress Management Society)
- You ask customers or suppliers of the Company to make charitable contributions

### Speeches and Presentations



- You are offered a fee or other compensation for outside speeches or presentations in connection with your work for The Stress Management Society

#### Political Relationships

- You work on a political campaign during working hours
- You express political views in a setting where your audience may think you are speaking on behalf of the Company
- You make contributions or payments to political parties or candidates on behalf of the Company

If you have any questions or doubts about whether you have a conflict of interest, please contact the chief executive officer.

#### CORPORATE OPPORTUNITIES

Teammates and directors have an obligation to advance the Company's legitimate interests when the opportunity arises and may not (a) take for themselves a corporate opportunity that is discovered in the course of employment or through the use of corporate property, information or positions, (b) use Company property, information or position for personal gain, or (c) compete against the Company.

While teammates are normally expected to devote their full time in working exclusively for the Company, exceptions may be permitted upon a showing that the teammate's performance of services for others, whether for compensation or otherwise, will not interfere with the performance of his/her assigned Company duties and responsibilities and will not violate any policy of this Code.

## Conducting Business

#### FAIR COMPETITION AND DEALINGS

In the conduct of its business, The Stress Management Society is committed to vigorous and fair competition based solely upon the merits of our competitive offerings. Making derogatory remarks about our competitors is not an acceptable business practice. No teammate or director may take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair dealing practice.



Under law, agreements and conduct that unfairly restrict competition may be illegal. Examples of illegal behaviour include agreements between competitors to fix prices for services or products or to divide up customers or territories. We must be especially careful in conducting ourselves at meetings or conferences where our competitors are present or participating.

Certain topics that may never be discussed with competitors include, but are not limited to, pricing, pricing methodology, pricing formulas, profits or profit margins, credit terms, market share and bidding processes. Teammates must not engage in activities or discussions that could lead to allegations or the appearance of improper behaviour. Consult a director if you ever have questions about proper behaviour at meetings where competitors are present.

#### GIVING AND RECEIVING GIFTS AND ENTERTAINMENT

To avoid possible conflicts of interest and because it is potentially illegal to personally exchange something of value with a customer or supplier in connection with the transaction of business with the Company, you are not permitted to give gifts to or receive gifts from any existing or prospective customer or supplier, except as provided in these standards of conduct.

A gift includes anything of monetary value and may include, by way of example, meals, trips and invitations or tickets to recreational or sporting events.

All gifts are prohibited except for the following, which can only be given or received after confirming that the gift is permitted under the policies and procedures of the customer's or supplier's organization:

- Unsolicited gifts given at holiday time or on special occasions that create no sense of obligation on the part of the customer or supplier, provided that the retail value of the gift does not exceed £100 (unless a higher value gift is specifically approved in writing by your supervisor or an officer of the Company or, in the case of an officer or a director).
- Gifts clearly not attributable to any Company business relationship, such as gifts given because of kinship, marriage or social relationships.
- Meals or entertainment that are neither designed nor intended to create a sense of personal or corporate obligation on the part of the recipient and the primary purpose of which is to hold bona fide business discussions. All such expenses must be modest as judged by local standards and are subject to the Company's policies on meals and entertainment, as well as expense reimbursement.
- Corporate charitable contributions approved in accordance with Company policy and personal charitable contributions that are not made for the purpose of securing favourable business treatment.
- Reasonable honorarium given for services rendered to the Company by a representative of a customer or supplier (or by a representative of the



Company to a customer or supplier), provided that any cash or other monetary honorarium shall be paid to a charity selected by the Company.

If you are offered or receive anything of value that is arguably beyond what is permitted by the Code of Honour or that you believe may be an attempt to improperly influence the performance of your duties, you should immediately report this to your line manager. In such cases involving a gift to an officer or a director, this report must be made to the chief executive officer. Prohibited gifts or gifts that create a sense of obligation should promptly be returned to the donor.

#### POLITICAL CONTRIBUTIONS

Company funds, property or resources may not be used to make contributions, directly or indirectly, to candidates for political office or to political organisations. Indirect political contributions include the purchase of tickets to special dinners or fund-raising events for political candidates or the furnishing of supplies, equipment or services to political parties or committees. You may contribute personally to the candidates or party of your choice, but no director or teammate will be reimbursed or compensated for any such personal contributions.

## Integrity of our product purchasing practices

#### INTEGRITY OF PURCHASE CONTRACTS

We are committed to maintaining the integrity of purchase contracts between our suppliers and customers. Rebates processed and claimed by the Company for such purchase contracts will only be on products sold, invoiced, and delivered to the valid contract account as authorised by the supplier. Fictitious billings to a valid contract account will never be used to claim rebates for products sold or invoiced or delivered to another account. Billings and/or credits to a valid contract account, where the purpose is to generate rebate claims that will benefit the Company, and/or to an invalid contract account, either directly or indirectly, are strictly forbidden.

#### FREE GOODS

“Free goods” are products offered to the Company from a supplier for other than direct monetary payment. Although the acceptance of “free goods” from



suppliers is not prohibited by the Company, this occasional practice must follow the Company's policies and procedures. Any transaction involving the receipt of free goods by the Company must serve a clear and legitimate Company business purpose, may not result in the personal gain of any person and must be in compliance with the Company's free goods policy; as such policy may from time to time be amended or restated. Compliance with this free goods policy includes properly supporting, documenting and accounting for free goods transactions. All contemplated transactions involving the receipt of free goods need to be discussed with and approved by a senior manager or director.

## Integrity of our Business and Accounting Practices

### SAFEGUARDING COMPANY INFORMATION, ASSETS AND PROPERTY

Teammates and directors must protect the Company's information, assets and property by ensuring their efficient use only for legitimate business purposes. These assets include, but are not limited to, financial assets (such as cash), physical assets (such as furnishings, equipment and inventory) and intangible assets (such as customer relationships, intellectual property and information about products, services, customers and systems). Any suspected fraud, theft or misuse of Company information, assets or property must be reported immediately for investigation.

### COMPUTER SYSTEM USE, CONFIDENTIALITY AND SECURITY

The information processed and stored on our computer systems is critical to the daily operations of The Stress Management Society, and everyone who uses them must ensure that they are used appropriately and in accordance with relevant security and other policies governing their use.

Computer hardware and software and all information on our systems, as well as any Company information on your home computer, are Company property and must be used responsibly and primarily for the Company's business purposes. In addition, all computer system data created and stored for the Company and its



customers must be treated as confidential information and protected. Every teammate is required to comply with the Company's Information Technology Security Policy, as from time to time adopted or revised by the Company.

As most Company software is protected by copyright, no computer software licensed to the Company may be copied or duplicated by any teammate without the express written approval of officer of the Company designated to handle IT issues. No teammate may use software that is not licensed to or owned by the Company. We must all obey the copyright laws that pertain to licensed software, as violation of these laws can lead to serious civil and criminal liability.

**Q; Sometimes I work from my home office, and I wanted to know if I could download software from my work computer to my home computer?**

**A; No, The Stress Management Society licenses much of its computer software from other companies and these licenses often limit the number and location of computers on which the software may be loaded. Using unauthorised copies of software could put us in breach of and otherwise jeopardise our license agreements.**

## PERSONAL USE OF PHONES, COMPUTERS AND OTHER COMPANY ASSETS

On an occasional basis, you are allowed to use Company computer and telephone systems for personal reasons, provided that such use is consistent with the Code of Honour, is nominal in terms of time and does not interfere with the performance of your job responsibilities. In no event may you use Company assets in a manner contrary to our policies, including but not limited to this Code of Honour, or in any way that is offensive, sexually explicit or inappropriate.

There should be no expectation of privacy in connection with your use of Company computers, telephones or other assets.

## SOCIAL MEDIA

External personal websites, blogs, social networking sites and other electronic forums for disclosing information are prevalent in our technology- and internet-driven world. As a result, the Company has certain guidelines that must be



followed relating to social media and which are more completely and specifically described in our Social Media Policy. These guidelines include, but are not limited to, the following:

- Teammates may not create, maintain or post to external sites or social media outlets on behalf of the Company without the express permission of the Company.
- Teammates may not disclose on external sites or social media outlets confidential information of the Company, our suppliers, vendors or customers.
- Teammates may not use social media to make marketing, advertising or publicity statements about the Company or its products or services without the express permission of the Company.

Any discussion about, or relating to, the Company that is not prohibited by the above guidelines or our Social Media Policy should be in good taste, should not misrepresent or disparage the Company and should be accompanied by a clear and conspicuous disclaimer that the views expressed do not necessarily reflect the views of The Stress Management Society. Under no circumstances may any teammate use Company trademarks, service marks or logos in connection with any personal posting.

#### PROPER ACCOUNTING AND COMPANY RECORDS

Company business records must always be prepared accurately and completely. They are of critical importance in meeting our financial, legal, tax and management obligations. The books of account, financial statements and records of the Company must accurately reflect the operations and financial results of the Company in accordance with generally accepted accounting principles. All assets, liabilities, income and expenses of the Company are required to be properly recorded in the books and records of the Company. There may be no disbursements or receipts of corporate funds outside of the Company's established system of accountability. Records are to be kept in accordance with the Company's internal controls at all times, fully and accurately reflecting all transactions. No unrecorded fund or asset may be maintained. No false or misleading entry, record or report may be made or permitted to go uncorrected. All reports, vouchers, bills, payroll and service records, measurement and performance records, and other essential data must be prepared with care and honesty.

#### PROPER DEALING WITH AUDITORS

No teammate or director may take any action to fraudulently influence, coerce, manipulate or mislead the Company's independent auditors, nor shall any teammate or director conceal any information necessary for the preparation of accurate financial statements.

#### RECORDS MANAGEMENT



The Stress Management Society complies with all applicable laws and regulations relating to the retention and preservation of records. All teammates are expected to maintain and dispose of records in accordance with our Records Management Policy, as from time to time adopted and revised by the Company. Under no circumstances may anyone selectively edit or discard records.

Records are especially important in the context of government investigations or actual or threatened litigation. If you are contacted regarding any such matter, you should immediately notify and inform a director. You should also retain and preserve all records that may respond or relate to the matter (including paper and electronic documents, as well as electronic and voice-mail messages) until a director advises you how to proceed.

# MOBILE PHONE POLICY AND GUIDANCE

## INTRODUCTION

This policy is designed to safeguard both The Stress Management Society and users of mobile phones supplied by the organisation and also personal phones. It aims to ensure that these are used effectively, for their intended purposes and without infringing legal requirements or creating unnecessary business risk. This policy sets out general principles and specific rules. Its aims are to:

- promote the effective use of company and personal mobile phone facilities.
- ensure that all users understand how mobile phones supplied by the organisation should and should not be used.
- protect both the organisation and individuals from the possibility of legal action.
- protect the organisations information technology systems against damage from mobile phones which have email and internet facilities.

This policy applies to all persons granted use of mobile phones or systems accessible by mobile devices. This includes employees, staff seconded to the organisation from other organisations and elected members, whether located within or out of our premises. It also includes staff connecting to society resources using mobile phones which have email and internet access.



## GENERAL PRINCIPLES

Mobile phones are provided primarily for the following circumstances

- the need for the employee to be contactable and to contact others.
- if the job requires out of hours contact.
- if following a risk assessment, a risk to personal safety exists which in part may be addressed by access to a mobile phone.

In determining whether a mobile phone is required, the following factors will be considered

- whether the employee has other communications facilities which would suffice.
- whether the employee could share a mobile phone with other employees
- whether another mechanism would satisfy the communications requirement.
- revenue budget considerations.

Eligibility for a mobile phone is determined as an operational matter for managers.

You must use company mobile phones responsibly, lawfully and in accordance with the terms of this policy.

You must not use the mobile phone in any way which is inconsistent with carrying out your job or might conflict with the society's interests.

You must not use the mobile phone to access, use or distribute any material, or to participate in any activity, which is, or might reasonably be regarded as, distasteful, offensive or indecent or harmful to other users.

The following list gives examples of the sort of material or activities will be regarded as unacceptable. It is not exhaustive.

- bullying or harassment.
- personal insults, attacks or abuse.
- racist or sexist activity.
- chain letters or games.
- pornography.

You must not use the mobile phone to:

- participate in internet chat rooms or groups etc
- place orders for goods or services (unless authorised to do so).
- carry out any business activity either for yourself or on behalf of someone else.
- upload, download or otherwise transmit commercial software or other material, in violation of its copyright.



If you identify any abuse or misuse of the mobile phone you must report it to your manager.

## BREACHES OF THE POLICY

Employees who do not follow the terms of this policy will be liable to disciplinary action and, depending on the nature of the breach, may also be liable to legal proceedings.

Non-employee users of the facilities who breach the policy may have their access to the facilities withdrawn and, depending on the nature of the breach, may be liable to legal proceedings.

## PERSONAL USE

The society provides mobile phones to help you to carry out your job. However you are allowed personal use of the mobile phone as long as you adhere to the terms of this policy.

While composing, sending or reading SMS messages or using the society supplied mobile phone for personal voice calls occasionally during working hours is allowed, excessive use during normal working hours is not.

The general requirement is that your personal use of the mobile phone must not interfere with doing your job.

Downloads of any materials such as applications or ring-tones are not permitted as viruses can often be embedded in these materials, hence rendering the mobile phone provided by the society inoperable.

## REIMBURSEMENT OF PERSONAL USE

The mobile phone user must reimburse the society for all personal calls, SMS/MMS messages and for personal browsing inclusive of VAT. The society has arrangements in place for the recovery of the cost of personal use of these facilities. This is in accordance with procedures determined by the Head of Finance.

## MONITORING

The society continuously monitors the use of mobile phones. It does this to:

- identify unauthorised, improper or criminal use of the facilities.
- identify breaches of this policy.
- where mobiles have internet/email access, maintain the security and confidentiality of its information technology systems.
- help maintain the effective operation of these systems.
- check service standards.
- allow managers to control revenue spend.



To achieve these purposes the council monitors:

- call records via invoices & management reports.
- internet downloads, data volumes, and times and dates.

For Mobile phones which have internet or email functionality, the existing policy available within this code of honour on Email and Internet Policy apply and must be adhered to.

#### MOBILE PHONE SECURITY

Relevant care should be taken to ensure that mobile phones are kept securely and not left on display in cars etc.

Security lock codes should be used where available to prevent misuse of company mobiles. Line managers should keep a record of individuals' mobile locking codes, should the user forget their code.

#### VOICEMAIL

Users should ensure their voicemail is set-up as detailed in their handbook supplied with their mobile. Not only is this convenient, it is essential to have this set up in advance in case a call should come in while the mobile phone user is driving.

#### USE WHILE DRIVING

Mobile phones must not be used while driving. Voicemail should be relied upon to answer the call whilst driving. The user can then take the message when safe and legal to do so. The advice from the Royal Society for the Prevention of Accidents' can be viewed at [Driving for Work: Mobile phones website](#).

RoSPA's advice also states that car handsfree kits should not be used while driving as it only slightly reduces the risk to the driver.

#### DOWNLOADING SOFTWARE

Mobile phone users should not download software onto their phones. Downloads can contain viruses which renders the phone useless and irreparable.

#### LOST OR STOLEN MOBILES

Mobile phone users should report phones directly to the service provider to limit the society's liability for calls made from the handset.

#### REDUNDANT OR SURPLUS MOBILE PHONES

Once a mobile phone has been replaced or upgraded due to age, or where a mobile phone becomes surplus, mobile phones should be labelled for recycling and returned to the manager.



## PERSONAL MOBILE PHONE USE

As a general rule all personal mobile phones should be kept off and put away during office hours, unless agreed with a Senior Manager. If your personal mobile is also used for business purposes please ensure that personal calls, emails etc. are not checked or responded to during office hours.

I have read and understand all elements of this Code of Honour and agree to uphold it. I understand there will be disciplinary repercussions for any breaches to this Code of Honour

Signature:
Name:
Title:
Date:

END



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Code of Honour



Stress Management Society  
from distress to de-stress