

## *QMS 378 - Conexus Recovery*

### *Office - Code of Conduct/ Corporate Responsibility*

# *Doing The Right Thing*

*Conexus Recovery*



Conexus Recovery - Do what is right, Find a better way and Build something great.

Version	author	date	Change details
1 <sup>st</sup> draft document	SS	Aug 2018	Draft only required for initial set up
V1	SS	29/10/2020	Full document review to meet business needs / legislation
V2	SS	11/11/2021	Full document review to meet business needs / legislation



## *Doing the Right Thing*

At Conexus we aim to always do the right thing for our client's customers, treating customer fairly is at the heart of Conexus Recovery.

Whatever our role may be at Conexus there will always be times when we are faced with difficult decisions, but when we are, it is important that all our staff know what is expected of them and us – which is doing the right thing for our clients customers.

Doing the Right Thing is not just about obeying the law – it goes far beyond that, it is about putting the customers first, doing what is right for the client's customers and treating the customer fair at all times.

Treating customers fairly is not only a requirement of the FCA but is a requirement of all companies who are regulated accordingly.

Conexus Recovery will strive to ensure right outcomes for customers also in accordance with CONC rules.

1. We will encourage a culture of openness and PROVIDE training to our people to deliver fair customer outcomes, whatever their role
2. We will monitor our teams performance and incentivise our people to deliver FAIR customer outcomes
3. We will implement controls to MONITOR staff interaction with customers and report and resolve issues when identified
4. We will speak to customers with RESPECT
5. We will administer customer accounts FAIRLY and effectively
6. We will INVESTIGATE complaints fully, rectify identified wrongdoings and provide clear explanations to our customers
7. We will acknowledge potential signs of financial DIFFICULTIES and give customers options that are reasonable and clear to them
8. We will seek to identify when things have gone wrong and work to CORRECT them quickly and effectively, mitigating the likelihood of reoccurrence

Conexus Recovery and Field Services Ltd promotes the 8 customer commitments as a way of confirming the focus on creating a unified culture that expects fair treatment of customers.

These commitments are designed to ensure we offer a compliant and suitable service to our customers, ensuring that communication is paramount at each juncture.

**We act with integrity there is an authenticity, fairness and honesty at Conexus Recovery.**

Being trusted means always doing the right thing for our customers, communities, investors, regulators and colleagues. This means that we will never tolerate fraud, bribery or corruption – and that we only ever work with suppliers and partners who care about this as much as we do.





### Employment Relationship

Conexus and our business partners shall adopt and adhere to rules and conditions of employment that respect workers and, at a minimum, safeguard their rights under national and international labour laws and regulations.

### Harassment or Abuse

Conexus and our business partners shall ensure that every employee are treated with respect and dignity. No employee shall be subject to any physical, sexual, psychological or verbal harassment or abuse.

### Child Labour

Conexus and our business partners shall ensure that no person under the age of 15 or under the age for completion of compulsory education, whichever is higher is employed.

### Health and Safety

Conexus and our business partners shall provide a safe and healthy workplace setting to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of employers' facilities.

### Anti-Fraud

Conexus is committed to developing an anti-fraud culture and actively seeks to deter and prevent fraud and corruption by ensuring that risks are identified and managed effectively. The company will not accept any level of fraud, bribery or corruption and will investigate thoroughly all suspected cases. Staff involved in an impropriety of any kind will be subject to the company's disciplinary

### Non-discrimination

Conexus and our business partners shall ensure that no person will be subject to any discrimination in employment, including hiring, compensation, advancement, discipline, termination or retirement, based on gender, race, religion, age, disability, sexual orientation, nationality, political opinion, social group or ethnic origin.

### Forced Labour

Conexus and our business partners shall ensure that there is no use of forced labour, including prison labour, indentured labour, bonded labour or other forms of forced labour.

### Freedom of Association & Collective Bargaining

Conexus and our business partners shall recognize and respect the right of employees to freedom of association and collective bargaining.

procedures and legal action will be taken where appropriate

### Hours of Work

Conexus and our business partners shall not require workers to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. The regular workweek shall not exceed 48 hours. Employers shall allow workers at least 24 consecutive hours of rest in every seven-day period. All overtime work shall be consensual. Employers shall not request overtime on a regular basis and shall compensate all overtime work at a premium rate. Other than, in exceptional circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours.





### Compensation

Conexus and our business partners shall ensure that every worker has a right to compensation for a regular work week that is sufficient to meet the worker's basic needs and provide some discretionary income. Employers shall pay at least the minimum living wage or the appropriate prevailing wage, whichever is higher, comply with all legal requirements on wages, and provide any fringe benefits required by law or contract.

### Bribery and corruption

Conexus and our business partners shall ensure zero tolerance towards bribery, money laundering, fraud, tax evasion and corruption.

### Whistleblowing

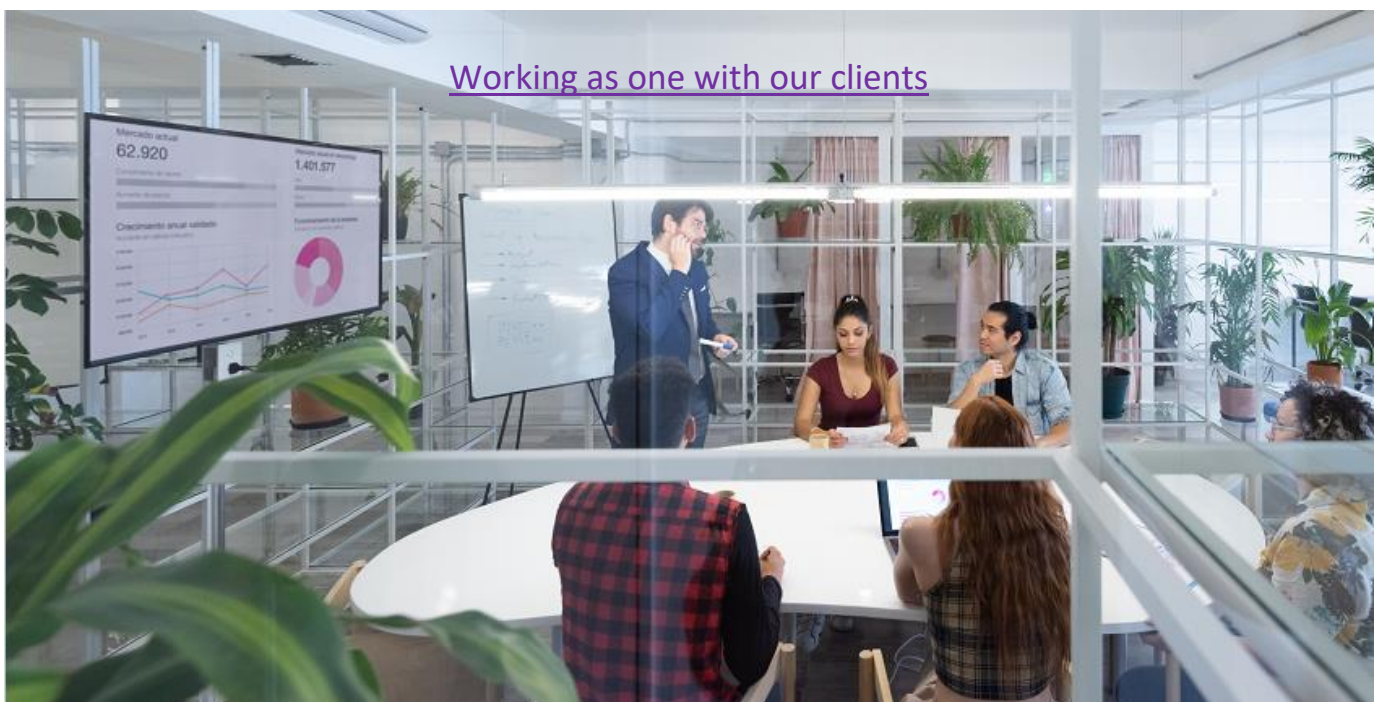
Conexus encourages staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected. Staff will have the guidance on how to raise those concerns, and have confidence that raising their concerns will have no reprisals.

### Security

Conexus and our business partners shall have robust cybersecurity measures in place to protect the privacy of all individuals and the confidentiality of any personal data. Conexus will also ensure that all clients' information is confidential unless our client's management team has given specific authorisation.

### Environment

Conexus and our business partners shall be committed to good environmental stewardship and strive to minimise resource consumption, emissions and pollution. Conexus will record their carbon emissions and be able to demonstrate emissions reduction initiatives that are in place. We will seek to work with our business partners to resolve non-compliance with the Code, but we reserve the right to terminate contracts in the event of a material breach.



Working as one with our clients



**CONEXUS**  
RECOVERY & FIELD SERVICES

## *Customer's Data*

We exist to serve our clients customers and we can earn their trust by acting diligently, focussing on their needs and delivering excellent service. Our client's customers will deal with us in lots of different ways.

They might email us, or write to us, give us a call or get in touch with us via social media or web chat.

Over the course of time, we will collect lots of data and information about them, however they choose to share it, our customers trust us to keep it safe.

We also collect a lot of information about our colleagues and they trust us to protect that data in exactly the same way as we would for our customers.

We will never:

- Share customer or colleague data with other people or companies – unless the customer or colleague has given us permission to do so.
- Use colleague or customer information for our own personal benefit.
- Let any of our third party suppliers access our customer or colleague data on our behalf without checking with Group Security and Group Commercial first.
- Give anyone who has not had the right training access to customer or colleague data – which should be securely stored at all, times.
- Ignore it if we believe that any customer or colleague data has been misused or lost. We should contact our line manager, a senior executive or use the confidential Speak-Up helpline immediately.

## **Doing the right thing**

We have a suite of policies to help all our staff & guide us all to help us do the right thing for our clients customers.

