

Document Classification: RAC Internal – may be sent externally

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| <p>Date of document: The date upon which this document was prepared</p> | 24 June 2022 |
| <p>Policy Manager The person responsible for writing or coordinating writing of the policy</p> | Employee Relations Manager |
| <p>Policy owner The person responsible for preparation of the policy and for update and review</p> | Chief People Officer |
| <p>Due for review on: The date by which this policy is scheduled to be reviewed to ensure the policy is up to date. This policy will remain in force however, until updated or replaced.</p> | 24 June 2023 |
| <p>Other Key stakeholders: Key colleagues with a specific business interest in the policy</p> | Chief Financial Officer, Chief Executive Officer |
| <p>Policy Enforcement Officer: The Person within the company responsible for enforcing of taking appropriate action in the event of policy breach</p> | Chief People Officer |

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RAC Code of Conduct

1. Introduction and Aims

RAC is proud to have established a reputation and brand that is built on trust and respect. We acknowledge that colleagues, customers and partners are at the heart of everything we have achieved and are essential to our ongoing success – people are our business.

In order to build on this, the way that we behave towards, and the way in which we are perceived by colleagues, customers and partners must reflect RAC's core values. The aim of this Code is, therefore, to explain and illustrate the standards of conduct and behaviour that underpin these values.

2. Scope

This code is intended to cover all colleagues, although some issues may be more relevant to certain specified roles than others (for example depending on whether or not you work within a call centre environment, at the roadside, in a managerial role or in a regulated position).

This code is shared with new joiners on induction and as part of ongoing mandatory refresher training.

3. Our Values

To ensure that we keep the best interests of our colleagues and customers at the heart of everything we do, all colleagues and those that work on behalf of RAC are expected to behave and work in a way that reflects the following values:



Handle it Together Exceptional Service Raise the Bar Own It

Our Values

Our Values ensure that we keep the best interests of our Colleagues and Customers at the heart of everything we do

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| <p>Handle it Together We work as one team; showing trust, respect, fairness and integrity</p> <p>Exceptional Service We deliver excellent results and service, every time</p> <p>Raise the Bar We always look for new ways to be even better</p> <p>Own It We are empowered to take action</p> |
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These values are demonstrated when the following core behaviours are reflected consistently:

Handle it together

We work as one team; showing trust, respect, fairness and integrity. We enable this to happen if we:

- protect and promote the principles of equality diversity and inclusion by not:
 - tolerating behaviour or acting in a way that is disrespectful, unfair or unlawful discrimination, victimisation or likely to cause others to feel bullied and/or harassed (see [Equality Diversity & Inclusion Policy](#), [Harassment Policy](#), [RAC Human Rights Policy](#), [Social Media Policy](#));
 - engaging in, or appearing to condone, inappropriate comments/banter of an offensive and derogatory manner (for example, of a sexual nature or linked to race, gender, religion, sexual orientation, disability, age or any other protected characteristic);
- protect and promote the principles of operating in a transparent, honest and ethical way (see [Anti Bribery and Corruption Policy](#) and [Conflicts of Interests Policy](#)) by not:
 - acting in a way that is intended (or reasonably likely to) mislead/misdirect, undermine trust and confidence, or foster division/impact negatively on effective working relationships;
 - concealing (by act or omission) any actual, potential or perceived conflict of interest;
 - engaging in illegal/dishonest activity and/or a manner that is likely to impact negatively on the credibility or reputation of yourself, your colleagues and/or RAC's reputation or brand.
 - making covert audio and/or visual recordings of colleagues or customers
- ensure that our private or personal interests do not influence our decisions and that we do not use our positions to obtain personal gain of any sort, either for ourselves directly or for our family, friends or associates;
- declare any actual or potential conflicts of interest openly, proactively and transparently [see [Anti Bribery and Corruption Policy](#) and [Conflicts of Interests Policy](#)];
- immediately notify the Company in writing if we are arrested, charged, summonsed or convicted (see [Employee Screening & Disclosure of Criminal Convictions Policy](#));
- cooperate with RAC's requirements, direction and procedures to enable and manage effective team working, communication and resolution of disputes.

Exceptional Service

We deliver excellent results and service, every time. We enable this to happen if we

- protect and promote RAC's ability to function efficiently and effectively [see contractual requirements, Essential Learning Modules, this Code of Conduct, [Attendance Management Policy](#), [Disciplinary Policy](#), [Capability Policy](#), [Time Off Policy](#)] by not:
 - acting in a way that is unreliable regarding timekeeping, attendance for work, the organisation of our workload, compliance with procedures or performance standards, or following reasonable instructions;
 - abusing or seeking to circumvent the controls, measures or rules that have been put in place by the Company;
 - failing to use all reasonable efforts and care to apply our knowledge, skill, experience and training to make sound and informed decisions and/or to act in the best interests of the

- company;
- o failing to abide by reasonable management instructions and or direction regarding work priorities;
- o acting in a way that is likely to undermine effective team working (including communication and co-operation);
- protect and promote the maintenance of a safe and supportive culture and environment (see [Health & Safety Policy](#)) by not:
 - o acting in a way that is contrary to (or seeks to circumvent) the safe working systems, training, and/or purpose of the equipment with which you have been provided;
 - o behaving in a threatening, intimidating, aggressive or violent manner (see [Disciplinary Policy](#), [Harassment Policy](#))
 - o taking insufficient responsibility for the protection of your own and others' safety and wellbeing during the course of your duties (see [Health & Safety Policy](#), Driving on Company Business Guidelines).

Raise the Bar

We always look for new ways to be even better. We enable this to happen if we:

- dedicate our working time towards applying our efforts, skills, knowledge and experience to the benefit of our customers and furthering the interests of the Company [Job description, Contract of Employment, [Acceptable Computer Use Policy](#), [Disciplinary Policy](#), [Capability Policy](#)];
- seek to learn from experience, adopt a solution-focussed stance, take informed risks and enter into constructive collaboration by not:
 - o accepting or adopting complacent and/or lax approaches to our work or interactions with others;
 - o failing to take personal responsibility for our own learning and development;
 - o seeking to cover up mistakes or to lay blame elsewhere;
- are open and cooperative with the FCA, the PRA and other regulators.

Own It

We are empowered to take action. We enable this to happen if we:

- are mindful of the need to lead by example by acting as ambassadors for RAC:
 - o promoting safe and responsible driving;
 - o acting in an ethical way and doing what we say we will do by not driving or attempting to drive in a dangerous or discourteous way (e.g. by speeding, and/or being under the influence of alcohol or other substances, and/or contrary to legal requirements);
- take personal responsibility to report any instances of actual or suspected wrongdoing (see [Whistleblowing Policy](#)).
- protect and promote the privacy of our colleagues and customers [[Privacy Notice \(Colleagues\)](#), , [Secure Workspace Policy](#)] by not:
 - o neglecting to maintain the security of information within our workspaces;

- taking inadequate care and attention in how we personally collect, use, process or store personal information.

4. General

You have responsibilities as a colleague/worker:

- to ensure that your conduct in the performance of your duties and in your interactions with colleagues is in line with these principles;
- to read and keep yourself updated with RAC's policies and procedures – abiding by and implementing those that apply;
- to act with integrity, respect, politeness and courtesy to all, upholding RAC's principles of equality and fairness;
- to ensure that while carrying out duties for RAC, you are free from the effects of alcohol, substance misuse or illegal drugs;
- to dress appropriately while carrying out duties for RAC (e.g. presenting yourself in a way that is professional and non-political, not excessively revealing or offensive);
- to comply with reasonable management instructions;
- to attend reliably for work – devoting your time to the delivery of our services to customers and the furtherance of RAC's interests;
- to maintain a secure work environment by minimising the potential for unauthorised access to RAC premises and systems (e.g. wearing your ID; challenging those that do not, when on site; keeping passwords safe; and storing and using sensitive information in an appropriate way);
- to avoid any activity in the public arena (including social media) which could bring RAC into disrepute or impact negatively on its credibility or its commercial competitiveness;
- to report financial impropriety, deficiencies in service delivery; or breaches of this Code of Conduct, RAC's procedures, or the law. This will either be to a senior manager or HR in accordance with internal procedures, or, where relevant, using the [Whistleblowing Policy](#).

Political and Religious activity at work

Whilst RAC recognises that you have a right to hold political and religious opinions and to take part in political and/or religious activity in your own time, we also recognise that politics and religion is a subject that can be contentious and cause division within workplace. It is therefore RAC's policy that colleagues may not take part in any type of political or religious activity while at work.

This includes times when you are at your normal place of work, working on customers' premises or anywhere else. It also includes break times if you are at the workplace

Confidentiality

You will pay due regard to confidentiality and data protection. Personal information about RAC clients or other customers, colleagues and other individuals, must be regarded as strictly confidential, and this confidentiality must be respected even after leaving RAC.

You will not disclose confidential information about RAC's business, tenders, contracts, or other commercially sensitive information to any unauthorised person or organisation. This confidentiality should be respected even after leaving RAC.

Safety

You will work in a way to protect and promote the safety and wellbeing of colleagues, customers and all those with whom you come into contact.

Activities outside work

You must obtain written consent to undertake any outside paid employment. You should be clear about your contractual obligations and should not take outside employment which conflicts with RAC's interests.

No personal use may be made of office equipment or space (including work mobile telephones), except in exceptional circumstances and with the agreement of your manager/supervisor.

Your Regulatory Responsibilities as a colleague/worker

As RAC is authorised and regulated by the Financial Conduct Authority (FCA) and Prudential Regulatory Authority (PRA), their specific standards and requirements of behaviour are set out within the [Regulatory Code of Conduct](#). Whilst the core principles are reflected within this overarching Code, you should familiarise yourself with the [Regulatory Code of Conduct](#).

5. Specified Roles

The following also apply to colleagues in managerial roles:

- You must provide clear direction and guidance on expected standards of behaviour, conduct and performance to all colleagues and those engaged to work on behalf of RAC;
- You must bring this Code to the attention of all colleagues and those working on behalf of RAC, so that they are aware of its implications for their work;
- You must ensure that employees, contractors, agency workers and all those working at or on behalf of RAC have a good understanding of RAC's values.

Recruitment and employment matters

- In order to avoid any possible accusation of bias, you must not be involved in an appointment where you are related to an applicant or have a close personal relationship outside work with them. Any such relationship should be declared to your manager/supervisor whether or not you are involved in the appointment process;
- You should not be involved in decisions relating to discipline, promotion, or pay adjustments for any other employee who is a relative, partner or close personal friend;
- You must not canvass the support of colleagues or Board members for any candidate applying for employment. You must also resist and report any attempt by others to do so;

Contracts and suppliers

- All current or past relationships of a business or private nature with external contractors or potential contractors should be declared to your manager/supervisor. This applies whether or not you personally are involved in the appointment or supervision of contractors;
- You must exercise fairness and impartiality when dealing with all consultants, suppliers, contractors and sub-contractors. All orders and contracts must be awarded on merit by fair competition.

Revision History

| Version | Date | Author | Remarks |
|---------|------------|-------------------|--|
| 0.1 | 01.01.2014 | Kelly Harding | Document Creation |
| 1.0 | 01/01/2014 | J Noden-Wilkinson | Minor Formatting changes and Publishing |
| 1.1 | 08/01/2014 | J Noden-Wilkinson | Updated link to Social Media Policy |
| 1.2 | 17/04/2014 | J Noden-Wilkinson | Updated links to Emergency Time Off for Dependants Policy, Sickness & Absence Management Policy and Time Off Policy |
| 1.3 | 28/04/2014 | J Noden-Wilkinson | Updated links to Acceptable Internet Use Policy and Clear Desk Policy |
| 1.4 | 22/07/2014 | J Noden-Wilkinson | Updated link to Clear Desk Policy |
| 1.5 | 22/07/2014 | J Noden-Wilkinson | Updated links to Acceptable Computer Use Policy |
| 1.6 | 26/09/2014 | J Noden-Wilkinson | Updated link to Clear Desk Policy |
| 2.0 | 10/03/2015 | D. English | Review and Renewal |
| 3.0 | 17/04/2015 | D. English | Review update to S.10 and Renewal |
| 3.1 | 21/04/2015 | J Noden-Wilkinson | Updated link to Attendance Management Policy |
| 3.2 | 03/06/2015 | J Noden-Wilkinson | Updated links to redirect to policy pages rather than individual policies which are apt to change regularly. |
| 3.3 | 07/10/2015 | D. English | Review and update for EAP |
| 4.0 | 07/06/2016 | D. English | Review and Republish |
| 4.1 | 03/05/2018 | H. Fray-Andrew | Renewal Date extended |
| 4.2 | 10/09/2018 | H. Fray-Andrew | Renewal Date extended |
| 4.3 | 09/11/2018 | J Noden-Wilkinson | Update Company Values |
| 5.0 | 29/04/2019 | H. Fray-Andrew | Review, Update and Publish |
| 6.0 | 28/04/2020 | H. Fray-Andrew | Review & Publish |
| 7.0 | 21/05/2021 | H. Fray-Andrew | Review, Update (insertion of link to social media policy and reference to colleagues not making covert recordings) and Publish |
| 7.1 | 21/04/2022 | H. Fray-Andrew | Amend document category to 'May be shared externally' |
| 7.2 | 24/06/2022 | H Fray Andrews | Review, Update and Publish |