

Creative Consultants Group (CCG) Code of Conduct

At CCG, all employees are expected to act with honesty, integrity and respect in every aspect of their work. This Code of Conduct sets out the standards of behaviour expected across the organisation. The purpose of this policy is to ensure that everyone working for or representing the company acts in a way that supports a professional, fair and respectful working environment.

Foster Trust and Credibility

The reputation of CCG depends on the trust we build with employees, customers, suppliers and other stakeholders. Every employee must carry out their duties in a way that protects and strengthens that trust. Commitments made on behalf of the business must be honoured wherever possible. Communication should be clear, truthful and responsible. When making decisions or taking action, employees should consider whether their actions support the reputation and credibility of CCG. Actions that damage trust or misrepresent the company's values are not acceptable.

Respect for the Individual

All employees have the right to work in an environment where they are treated with dignity and respect. CCG expects all staff to treat colleagues, clients and partners fairly and professionally. Our commitment to respect is guided by the Equality Act 2010, which prohibits discrimination, harassment, and victimisation across protected characteristics. Discrimination, harassment, bullying or offensive behaviour will not be tolerated. Employees must contribute to a workplace where everyone is able to participate fully and use their skills effectively. Any employee who experiences or witnesses inappropriate behaviour should report the matter to their manager or to HR department. Reports will be handled seriously and without retaliation against those raising concerns.

Promote Open and Honest Communication

Employees are encouraged to raise concerns, ask questions and report potential ethical issues without hesitation. Managers are responsible for creating an environment where concerns can be raised openly and addressed in a constructive way. Reports of unethical behaviour will be reviewed and investigated where necessary. Where wrongdoing is identified, appropriate action will be taken. Employees who raise concerns in good faith must not face negative consequences for doing so. Employees who raise concerns about wrongdoing will be supported and protected under the law (e.g., Public Interest Disclosure Act 1998 and related UK whistleblowing protections, including recent expansions to cover sexual harassment).

Set a Strong Example

Managers and senior staff must lead by example and demonstrate the standards set out in this Code. Leaders are expected to promote ethical conduct in everyday work activities and ensure that employees understand the expectations placed upon them. Ethical issues must be

addressed promptly and discussed openly where appropriate so that staff understand how decisions should be made.

Commitment to Responsible Conduct

Employees must act responsibly and follow company policies, procedures and standards when carrying out their duties. Where an employee is unsure about the correct course of action, they should seek advice from their manager or from HR department. Employees must avoid behaviour that could expose the company to unnecessary risk or harm its reputation.

Engage in Fair Competition

CCG competes fairly and honestly in the markets in which it operates. Business decisions must be based on the quality, value and reliability of the products and services offered. Employees must not enter into inappropriate arrangements with competitors or engage in behaviour intended to distort fair competition. Any commercial discussions or negotiations must be conducted with professionalism and transparency.

Respect Intellectual Property

Employees must respect the intellectual property rights of other organisations and individuals. Information belonging to competitors or third parties must not be obtained through improper means. Unauthorised copying, sharing or modification of copyrighted materials, proprietary information or other protected content is not permitted. Employees must only use authorised materials and systems when carrying out their work.

Avoid Conflicts of Interest

Employees must avoid situations where personal interests could influence, or appear to influence, business decisions made on behalf of CCG. Personal relationships, outside work activities or financial interests must not interfere with an employee's ability to act in the best interests of the business. Where a potential conflict arises, the employee must inform their manager so that appropriate steps can be taken to manage the situation.

Manage Gifts, Gratuities and Business Courtesies Responsibly

Employees must exercise care when offering or accepting gifts, hospitality or other business courtesies. Such gestures must not influence business decisions or create the appearance of unfair advantage. Modest and appropriate courtesies may be acceptable where they are reasonable and transparent. If there is uncertainty about whether a gift or hospitality should be accepted or offered, employees should consult their manager before proceeding.

Ensure Accurate Disclosures

Information prepared or shared by employees on behalf of CCG must be accurate, complete and honest. Employees must not falsify information or omit important details to achieve business goals. If inaccurate information is discovered in reports, documents or communications, employees must take prompt steps to correct the issue and inform the appropriate manager.

Maintain Transparent Record-keeping

All business records created by employees must be clear, accurate and properly maintained. Records should reflect the true nature of transactions and activities carried out by the company. Employees must ensure that documents, financial records and operational records are recorded correctly and stored in accordance with company procedures.

Promote Substance Over Form

Employees must focus on doing what is right rather than simply following procedures without thought. Decisions should reflect the values and standards of CCG. Where a situation raises ethical concerns, employees should consider whether the action reflects honesty, fairness and responsibility. If the answer is uncertain, guidance should be sought before proceeding.

Uphold Accountability

Every employee is responsible for following this Code of Conduct. Employees must familiarise themselves with the standards described in this policy and apply them in their daily work. If an employee is unsure about how a policy applies to a situation, they should seek guidance from HR department. Failure to follow this Code may result in disciplinary action, which may include termination of employment.

Safeguard Confidentiality

Employees must protect confidential and proprietary information belonging to CCG, its clients, employees and partners. Confidential information must only be accessed or shared where it is required for legitimate business purposes and with appropriate authorisation. Sensitive information must not be disclosed to unauthorised individuals or used for personal benefit. Confidentiality provisions will not be applied in a way that prevents employees from reporting harassment, discrimination or other unlawful conduct as permitted by UK law.

Use of Company Resources

Company equipment, systems and facilities are provided to support business activities. Employees are expected to use these resources responsibly and primarily for work purposes. Limited personal use may be permitted where it does not interfere with work responsibilities or workplace operations. The company may monitor the use of its systems and resources to ensure they are used appropriately.

Addressing Media Enquiries

To ensure that communications with the media are accurate and consistent, employees must not respond to media enquiries on behalf of the company unless authorised to do so. All media enquiries should be directed to Managing Director.

Uphold Integrity and Ethical Standards

When faced with an ethical concern, employees should consider whether their actions reflect the values and standards of CCG. Employees should consider whether the action is consistent with company principles, whether important information has been omitted or misrepresented,

whether the decision would stand up to public scrutiny and whether it reflects personal integrity as well as the interests of the business.

Handling Material Breaches of Our Code

Where a serious breach of this Code occurs, CCG will investigate the matter and take appropriate action. This may include conducting an independent review of the incident, applying disciplinary action where wrongdoing is confirmed, ending relationships with external partners who fail to meet expected standards and strengthening internal procedures to prevent similar issues from occurring in the future.