

Policy

# Code of Conduct

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## 1 Introduction

e.surv are committed to be the most respected and trusted residential property risk and surveying experts in the UK. This can only be achieved by colleagues displaying the required level of personal and professional conduct whenever they are representing the company.

Ethical behaviour is an essential part of your role within e.surv and is a personal responsibility that should be taken very seriously. We need and expect each colleague to be accountable for their work and behaviour, and to support the purpose, vision and values upon which e.surv's reputation as a business rests. This Code of Conduct (the "Code") is a guide to help you live up to e.surv's values, abide by our policies and respect the best interests of our customers and stakeholders.

### 1.1 Purpose

The purpose of the Code is to describe the principles of business conduct and to provide guidance in ethical decision making. Many sections of the Code reference matters for which specific policies exist; this is because the Code encompasses standards of behaviour set out in other policies.

### 1.2 Scope

This Code applies to all colleagues and contractors, which for the purposes of the Code are referred to as "colleagues". Contractors include any consultants, contractors or agency workers who are required to have access to e.surv and / or its confidential, business and proprietary information in order to perform their role.

e.surv expect all colleagues to abide by and adhere to its internal guidelines and procedures and any statutory or regulatory requirements at all times. All colleagues must ensure that they read, understand and comply with the Code and all other applicable LSL Group and e.surv Company Policies.

### 1.3 Limitations

Although specific questionable activities may not be mentioned within the Code, ask yourself the following questions to decide if an activity should be reported or discussed with your line manager:

- Does it seem right?
- Is it legal?
- Is it compatible with the e.surv vision and values?
- Would I feel comfortable if I read about it in a newspaper or on social media?
- Would other people at e.surv feel uncomfortable if they read about it in the media?

Although this Code sets out fundamental principles of ethical and legal conduct, it cannot anticipate every ethical dilemma or situation you may encounter in performing your daily work. If at any time you are unsure about the proper course of action, discuss your concerns with your line manager.

## 2 Policy

This Code serves to encourage, explain and embed the e.surv Purpose, Vision and Values. It also serves to support the LSL Property Services Living Responsibly Priorities:

- People: We will become a better place to work
- Community: We will support colleague initiatives and give back
- Environment: We will reduce our environmental impact
- Governance: We will keep improving our governance

### 2.1 Our Purpose

We're committed to;

Providing the UK's leading residential property risk service

Delivering accurate and professional guidance on time, every time

Working with our customers to develop solutions that exceed their expectations

### 2.2 Our Vision

To be the most respected and trusted residential property risk and surveying experts in the UK.

### 2.3 Our Values

We deliver what we promise, when we promise it

We put our customers – and their needs – first

We take an honest approach to business

We listen, learn and find better ways to make a difference

#### Behaviours

We're target-driven, focused, loyal, dedicated, tenacious and hard working

We're professional, respectful, consistent, accurate, efficient, polite, and customer-focused, with a quality work ethic

We're clear, accountable, reliable, knowledgeable and direct

We're collaborative, empathetic, receptive and innovative

## **2.4 Demonstrating Behaviours “We’re target-driven, focused, loyal, dedicated, tenacious and hard working”**

### 2.4.1 Workplace conduct

We are committed to supporting a safe, healthy and positive workplace for all colleagues. We will not tolerate behaviour that interferes with a colleague’s ability to perform their duties.

You should honestly and properly carry out your work for the Company and make every reasonable endeavour to promote the Company’s interests. You should carry out your duties in a loyal and efficient manner and not do anything to harm the Company or LSL Property Services Group, or its business reputation.

### 2.4.2 Conflict of Interests

You must devote the whole of your attention and ability to the work of e.surv during your working hours and not undertake any other work or study during your working hours (unless with prior agreement by your Line Manager).

You must not undertake any work or activity, whether paid or unpaid and including self-employment, outside your normal working hours, which may in any way be in conflict with the Company’s interests, or impact on the performance of duties. You should obtain written approval from your Department Head/Senior Line Manager before accepting or undertaking any work or study other than for e.surv.

### 2.4.3 Drugs and Alcohol

We have a duty to keep our colleagues and the public safe from the risk of harm by individuals who work while they’re under the influence of alcohol and drugs. The use of alcohol and/or being under the influence of alcohol while conducting e.surv business or in company vehicles is prohibited.

Care should be taken when consuming alcohol when attending company functions or when entertaining clients. Whilst it may be outside of working hours, you are still representing e.surv.

No colleague or contractor is allowed to work if they’re under the influence of alcohol or illegal drugs. If you’re taking prescribed drugs that may affect your performance at work, you must get advice from your doctor. If your doctor tells you that a prescribed drug you are taking could affect your work, you must tell your manager.

Colleagues who take over the counter or prescribed medications must proactively report to a manager the use of medication which they are aware is likely to impair their ability to do their job.

If a manager suspects that someone has not followed these rules, they must take appropriate action. If a colleague openly admits that they’ve developed an alcohol or drug-related problem, we’ll support them in getting professional help.

We reserve the right to carry out tests for alcohol and drugs, in order to protect the health and safety of employees and others. Testing may be carried out:

- if required by law
- before we offer a job
- after an incident
- if there is good reason to believe that a person's work is affected by their use of alcohol or drugs.

We will provide support for those colleagues who feel they may have issues with alcohol or substance abuse or addiction. However, a breach of policy may be considered gross misconduct and action may be taken in line with the LSL Group Disciplinary Policy.

## 2.4.4 Health & Safety

e.surv has a dedicated Health & Safety team and is certified to an international standard for organisations (ISO45001) which requires colleagues' health, safety and welfare standards to be maintained at a high level.

All colleagues are responsible for their own health and safety and to look out for others. Colleagues are expected to report health and safety concerns where necessary (e.g. accidents, incidents, hazards and near misses).

If anything changes which may affect your ability to work safely, you must tell your line manager.

## **2.5 Demonstrating Behaviours “We’re professional, respectful, consistent, accurate, efficient, polite, and customer-focused, with a quality work ethic”**

### 2.5.1 Conduct when representing e.surv

You should conduct yourself professionally and with personal integrity, both in and out of the workplace, reflective of the e.surv values. Communicate honestly and respectfully with all colleagues, customers, stakeholders and members of the public.

The way in which colleague's dress and present themselves is important to portray a professional image. As such, colleagues must be aware of their appearance and adhere to the dress code policy at all times when representing the Company. Colleagues must apply common sense to ensure they consistently present an acceptable working image. The Dress Code Policy is available on PeopleMatters.

### 2.5.2 Conduct with customers or clients

Putting our customers - and their needs - first, is key to our business. Our customers deserve the highest quality customer service and standards in all transactions.

Provide our customers with value and deal with them fairly. Act with integrity and provide great service to our customers, either directly or by supporting the work of other individuals or teams.

Do not make promises that e.surv cannot keep.

## 2.5.3 Regulatory and Professional Standards

All colleagues are expected to comply with the professional standards of any governing body or professional association with whom they are accredited. For example, Surveyors must comply with the RICS Rules of Conduct at all times:

1. Members and firms must be honest, act with integrity and comply with their professional obligations, including obligations to RICS.
2. Members and firms must maintain their professional competence and ensure that services are provided by competent individuals who have the necessary expertise.
3. Members and firms must provide good-quality and diligent service.
4. Members and firms must treat others with respect and encourage diversity and inclusion.
5. Members and firms must act in the public interest, take responsibility for their actions and act to prevent harm and maintain public confidence in the profession.

## 2.5.4 Human Rights

We respect the Human Rights of all our colleagues and expect colleagues to do the same. This means ensuring dignity, freedom and respect via:

- **Child Labour:** e.surv will not use child labour and will comply with all relevant laws in this regard. We do, however, support legitimate workplace apprenticeships, internships and other similar programmes that comply with the applicable laws and regulations. We have guidance available for managers who are looking to employ 'Young Workers' aged 16 and 17 to ensure legal compliance.
- **Modern slavery:** e.surv will not use forced or involuntary labour, and workers can leave after giving reasonable notice, with all wages owed to be paid. We have a zero-tolerance approach towards human trafficking. Colleagues should familiarise themselves with the LSL Combined Ethics Policy available on PeopleMatters.
- **Health, Safety and Hygiene:** All e.surv colleagues will work in an environment that is both safe and healthy, in line with our Health and Safety Policy.
- **Discipline:** e.surv prohibits physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation. Disciplinary and grievance procedures are clearly documented and communicated to all colleagues.
- **Employee Representation:** e.surv takes active measures to seek employees' views about the business through our Colleague Engagement Forum, and respect colleagues' rights to belong to trade unions.
- **Working Hours:** e.surv will ensure that working hours are reasonable and comply with the law and industry standards.
- **Equality of Treatment:** e.surv is fully committed to eliminating discrimination in recruitment, training and working conditions, on grounds of race, colour, sex, age, religion, political

opinion, national extraction, sexual orientation, disability or social origin and to promoting equality of opportunity. We will not tolerate any form of discrimination or harassment, in accordance with human rights legislation.

- Employment terms: we provide written and clear contracts which detail the terms and conditions of our colleagues employment, in line with the requirement of Section 1 of the Employment Rights Act 1996.
- Remuneration: e.surv will, at a minimum, provide wages and benefits that meet national standards. We are working towards becoming an accredited Real Living Wage employer and are committed to equal pay and benefits for men and women for work of equal value.

## 2.5.5 Ethics

All e.surv colleagues are expected to strictly adhere to the company and LSL Property Services Plc Group's policies and procedures. Policies are updated annually and published via e.surv's intranet site, colleagues will be asked to read and attest compliance to various legal and regulatory policies.

Members of the RICS are reminded that they must comply with the Ethical standards detailed within the RICS Code of Conduct. Any breaches may be referred to the RICS for further investigation.

## 2.6 Demonstrating Behaviours “We’re clear, accountable, reliable, knowledgeable and direct”

### 2.6.1 Legal and Social responsibility

Ensure that your actions comply with and are within the meaning and intent of all applicable law and regulations. Ensure that your actions are free from suspicion and criticism and have no unfavourable effects on society.

If a colleague suspects a failure to comply with legal obligations, they should raise this in line with our Whistleblowing Procedure, contained within the Colleague Voice Policy available on PeopleMatters.

### 2.6.2 Environmental Protection

e.surv has committed to becoming a net zero business by 2040 or before and is certified to ISO 14001 which is an internationally agreed standard that sets out the requirements for an environmental management system (EMS). All colleagues have a responsibility to support e.surv's EMS and the 12 Green Commitments which underpin e.surv's Environmental Protection Policy and pathway to net zero. These aim to ensure the efficient use of resources, prevent pollution, reduce waste and help protect the environment from harm.

## 2.6.3 Health & Safety

You have responsibilities under the Health and Safety at Work Act 1974 to look after your own health and safety and to take reasonable care not to put other people – fellow employees and members of the public - at risk by what you do or don't do in the course of your work. You should not interfere with or misuse anything that's been provided for your health, safety or welfare and you should co-operate with e.surv and follow all health and safety policies and guidance in place for your protection.

If you have concerns about health and safety at work, you should discuss them with your line manager or the health and safety team.

## 2.7 Demonstrating Behaviours “We’re collaborative, empathetic, receptive and innovative”

### 2.7.1 Diversity

Respect the rights, cultures and dignity of all individuals and adhere to the principles of equity and non-discrimination when dealing with colleagues, customers, suppliers, or members of the public. For more information, please refer to the LSL Group Inclusivity & Diversity Policy (available on PeopleMatters).

To support Inclusion and Diversity, we operate an Inclusion and Diversity Forum as a voluntary, representative body of colleagues from e.surv and the wider LSL Group. The forum look to find new ways of working together that recognise, celebrate, and respect diversity, to help create a more inclusive culture; for the benefit of our business, our people and the communities we operate in.

### 2.7.2 Collaborating with Colleagues

We have formal and informal methods across the Group that can be used to communicate Views, share information and collaborate with colleagues:

**Manager Communication:** We encourage you to speak to your manager or management team to share feedback and suggestions. You can speak to your direct line manager or a senior manager. If you are a manager, part of your role is to support people and help them address issues or progress ideas where they are identified.

**Colleague Forums:** Our Colleague Engagement Forum (CEF) was formed in 2015 to help us use real colleague feedback about life at e.surv to drive change and raise our standards. Colleagues can raise issues and provide feedback through their designated representatives.

A number of e.surv CEF representatives also act as representatives on the LSL Colleague Engagement Forum to ensure dialogue at all levels.

**Recognised Committees:** If you need to speak to someone about a specific subject one, of our

committees may be the best group to speak to, such as the Health & Safety Committee.

For more information, please refer to the LSL Group Colleague Voice Policy (available on PeopleMatters).

### **3 Responsibility to report**

It is the responsibility of everyone at e.surv to report any known or suspected unethical conduct, which includes any violation of this Code, by other colleagues, or anyone in any way associated with the company. e.surv is committed to protecting all colleagues who report unethical conduct from reprisal as well as offering necessary support to individuals who make reports.

When a colleague makes a report of unethical conduct, they should do so in good faith. Detailed within the LSL Group Combined Ethics Policy (available on PeopleMatters) are the reporting procedures for colleagues who suspect or become aware of any unethical conduct, or whistleblowing concerns.