

Employee Relations: Disciplinary

At Acuiti Labs we recognise that the conduct of our people is central to our Values, our clients and wider professional relationships and our reputation as a professional services organisation. This policy sets out our approach to handling instances of misconduct, including gross misconduct, as defined in this policy.

It covers actions and behaviours that are deemed as misconduct or violations of company policies and procedures, employment terms and conditions, and information security processes, while ensuring that our practices remain consistent with local laws and regulations in each jurisdiction.

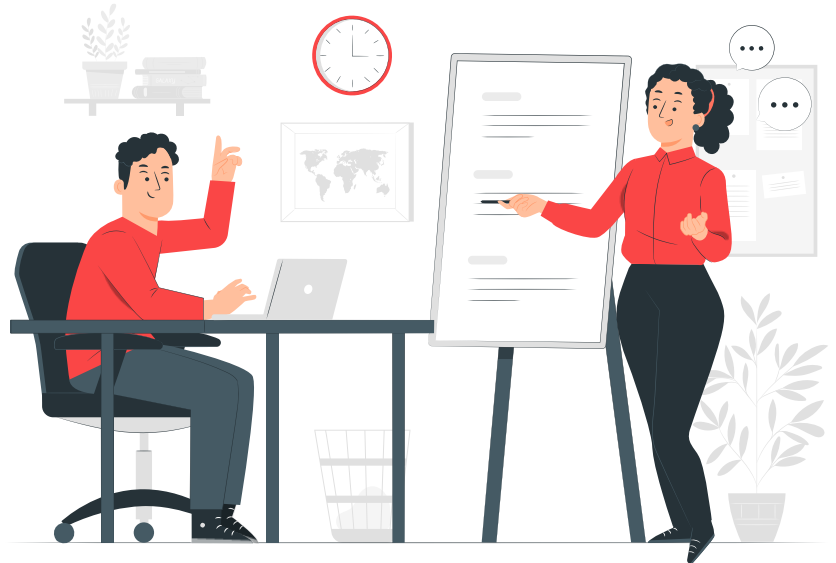
This policy does not apply to cases relating to genuine sickness absence, performance or redundancy dismissals. In some cases, there may be an overlap between performance-related issues and conduct issues. In such situations, Acuiti Labs reserves the right to determine the most appropriate policy to be applied.

This policy applies to all employees of Acuiti Labs, including full time employees and part time employees. It does not apply in the US.

Acuiti Labs reserves the right to depart from these procedures where appropriate from time to time and in accordance with local country laws.

Policy requirements

While working for Acuiti Labs, you should always maintain professional and responsible standards of conduct. In particular you should observe all terms and conditions of your employment contract, comply with all ethics and independence obligations, comply with our Code, comply with all reasonable instructions given by managers and act in good faith and in the best interests of our business, clients, partners and colleagues.



Failure to meet these standards may result in disciplinary action being taken under this policy. We aim to ensure that steps are taken to establish the facts and to give employees the opportunity to respond before any action (if appropriate) is taken.

If a warning is issued against you after a disciplinary process, this will be relevant to and have a detrimental effect on your Performance rating for the relevant performance year. Any individual issued with a disciplinary sanction may negatively impact their bonus award and/or salary review.

General principles

Confidentiality

Our aim is to handle disciplinary matters with due regard for the privacy of any individuals involved. Everyone involved in a disciplinary process must treat as confidential any information communicated to them in connection with a disciplinary process, investigation, fact-finding and / or panel meeting. The unauthorised disclosure of such confidential information to a person not involved in the relevant disciplinary process will be taken seriously and may lead to disciplinary action under this policy.

Co-operation

If you take part in a disciplinary process, for example, by attending a fact-finding meeting, providing potential evidence or attending a panel meeting, you are required to do so without unreasonable delay. You must co-operate fully and honestly.

Interaction with other policies

If you are a Line Manager and there is a potential disciplinary issue with a member of your team that may fall under another of Acuiti Labs policies or processes, consult the appropriate HR contact for advice immediately. Acuiti Labs reserves the right to determine the most appropriate policy and process to be applied in respect of investigating any matters arising in such cases. However, this Disciplinary policy will be applied in respect of any potential disciplinary action that it is decided should be taken against a Acuiti Labs employee.

Access to data for investigation purposes

Acuiti Labs reserves the right to access and view all electronic communications records, internet site records and building access records, email and all other electronic communication content including social and other networking sites as well as data stored on any Acuiti Labs information systems and/or Acuiti Labs property (including but not limited to, laptops and mobile devices or tablets) for the purposes of any disciplinary investigation.

Withholding access to Acuiti Labs IT systems and equipment

In some cases, in order to maintain the integrity of data, and/or to prevent loss or damage to Acuiti Labs's IT systems and/or to facilitate an investigation, Acuiti Labs may have to withhold an employee's access to certain or all Acuiti Labs IT systems. It may also be necessary to retain the employee's laptop, and/or mobile device and/or tablet or other Acuiti Labs equipment for the duration of the investigation. Where such action is taken it is not, in itself, disciplinary action.

Support for those involved

If you are the subject of a disciplinary investigation, you may contact your appropriate HR contact or Reporting Manager for advice or to discuss any aspect of the matter.

We will take into account your ability to fully participate in any meeting, (formal or informal) including where English is not your first language. Your local or nominated HR contact will be available to answer any queries you have relating to the disciplinary process.

If, because of a disability or long-term health condition, you believe there is an adjustment that would reasonably help you, it's important that you speak to your RM or local or nominated HR contact at the earliest opportunity to ensure that adequate support and adjustments that may be necessary are discussed.

Please note that Company Sick Pay is not payable to employees subject to this policy.

The company strictly prohibits retaliation against any employee who reports misconduct or participates in an investigation. Any act of retaliation will be treated as a serious violation and subject to disciplinary action.

All documentation and record-keeping practices are in full compliance with relevant data protection regulations, such as the General Data Protection Regulation (GDPR) in the EU, and other applicable laws in each jurisdiction where Acuiti Labs operates. This includes secure storage, handling, and deletion of records in line with legal requirements.

Misconduct and gross misconduct

Misconduct

Misconduct is conduct deemed by Acuiti Labs to be unacceptable that takes place whilst employed by Acuiti Labs or while representing Acuiti Labs at any time or during training, social or other Acuiti Labs events. Misconduct may also affect Acuiti Labs's client or business relationships and/or reputation. Misconduct covers a variety of unacceptable behaviours ranging from minor instances of misconduct to gross misconduct.

Gross misconduct

Gross misconduct is conduct that is considered to be so serious that it affects the working relationship and trust between you and Acuiti Labs and/or leads to a genuine belief that it is likely to significantly prejudice Acuiti Labs business or reputation. As a result, it will lead to Acuiti Labs terminating your contract of employment immediately and without notice or payment in lieu of notice.

In certain circumstances, conduct that takes place outside of the workplace and without any direct connection to Acuiti Labs may be so serious that it may affect your ongoing employment and may amount to gross misconduct. In such cases, we may deal with the matter under this policy, irrespective of any other legal action or investigation.

For a non-exhaustive list of examples of what Acuiti Labs considers to be gross misconduct, see below.

Minor misconduct and informal resolution

Our aim is to try and resolve minor misconduct issues in a reasonable and informal manner. In the case of minor misconduct, your RM (with their nominated HR representative) will discuss the cause for concern with you as soon as reasonably practicable. This may result in you being reminded of the required standard of conduct by receiving an informal verbal warning and, where appropriate, given an opportunity to improve your behaviour or conduct.

Formal disciplinary process

Where it becomes clear that the informal discussion is not appropriate or the cause for concern is not resolved, the following formal process should be used.

Investigation

Acuiti Labs reserves the right to determine the most appropriate investigation process and procedure for all disciplinary cases. Acuiti Labs also reserves the right to combine several allegations and complaints for investigation by the same investigator/s and where relevant to be heard by the same panel.

If you're subject to the formal disciplinary process, there will usually be an investigation to establish the facts relating to disciplinary allegations against you before proceeding to any disciplinary meeting. The purpose of an investigation is for Acuiti Labs to establish a fair and balanced view of the facts relating to any disciplinary allegations, before deciding how to proceed. This stage is purely for the purpose of fact-finding and no decision on disciplinary action will be taken until after a disciplinary panel has been held.

The nature, extent and formality of the investigation will depend on the nature of the allegations. It will vary from case to case and may include an investigatory meeting with you. There is no right to be accompanied to an investigatory meeting.

There is no right to have any investigatory meetings recorded in any manner and you are not entitled to make electronic recordings of them. On completion of the investigation and where the case proceeds to a formal disciplinary meeting, you do not have any right of appeal against the decision to proceed.

Suspension

In some cases it may be appropriate for you to be suspended during the course of the investigation. Any period of suspension will be for no longer than is necessary to investigate the allegations and so long as is otherwise reasonable while any disciplinary procedure against you is outstanding. It is not, in itself, a disciplinary sanction. You will continue to receive your normal salary and benefits during the period of suspension, however this will be under regular review.

The disciplinary panel meeting

A formal disciplinary panel meeting will be arranged to consider the disciplinary issue as soon as reasonably practicable. You will be requested to attend this meeting, which will be held at a Acuiti Labs office (although not necessarily your base office), or remotely via Microsoft Teams or other similar means.

You will (usually and where practicable) be given a minimum of 5 calendar days' notice, together with a copy of the documentary evidence the panel will consider in either hard or electronic copy. You will be notified in writing of the date and time of the disciplinary meeting and:

- the names of the panel members
- the alleged misconduct
- possible outcomes if the disciplinary panel decide that there has been misconduct or gross misconduct
- the right to be accompanied at the disciplinary meeting.

You should provide the name of the accompanying colleague or trade union representative (if applicable) to the HR contact as soon as reasonably practicable. You can find more information about accompanying colleagues in this policy. At the meeting, you will be able to respond to any questions the panel has and present any evidence of your own.

The panel

The panel will usually comprise of a senior member of Acuiti Labs and an HR representative. However, the makeup of the panel will be determined according to the nature of the particular case. A note-taker will also usually be present (in person or by phone or video link).

Notes and recordings

The notes of the disciplinary meeting will not be verbatim but will reflect what Acuiti Labs considers to be the main points of the meeting. A copy of the finalised notes will be provided to you on request. There is no right

to have the disciplinary meeting recorded in any manner and you (and your accompanying colleague, if any) are not entitled to make electronic recordings of any meetings.

What happens if you cannot attend

You must make every effort to attend the disciplinary meeting. If you or your accompanying colleague cannot attend, you should inform the HR contact immediately and Acuiti Labs will attempt to arrange an alternative time (which will usually be within 5 working days of the original meeting date).

You must make every effort to attend the disciplinary meeting, and failure to attend without good reason may be treated as misconduct in itself. If you unreasonably fail to attend without good reason or are unwilling to attend, Acuiti Labs may make a decision in your absence based on the available evidence.

The outcome of the meeting

The disciplinary meeting may be adjourned as necessary, for example, where further information or clarification is needed, or where you or any other party to the meeting needs a break. In any case the disciplinary meeting will usually be adjourned in order for the panel to consolidate and consider all the information available before reaching a decision. The panel will inform you of its decision without unreasonable delay. Your PM and HR contact may also be advised of the outcome and of any follow-up action required.

Possible outcomes

Acuiti Labs reserves the right to go to any stage of the Disciplinary policy at any time during a disciplinary matter. There may be occasions when a final written warning or dismissal is immediately justified depending on the overall circumstances and the seriousness of the disciplinary offence.

First written warning

Where the alleged offence is a first offence and a relatively minor misconduct issue, a first written warning is likely to be issued.

In any case where you have a live written warning for misconduct on your file, a second offence will usually result in a final written warning unless the second offence relates to gross misconduct, in which case the likely outcome will be immediate termination of your contract of employment.

Final written warning

A final written warning will be issued in any case where you have a live written warning for misconduct or poor performance on your file or where the misconduct is deemed to be so serious that a first written warning would be inappropriate.

Dismissal

In cases of gross misconduct and in some cases of misconduct (where for example there is a live warning in relation to the same and/or another misconduct issue) it may be decided that the most appropriate course of action is the termination of your contract of employment. In cases of gross misconduct, you will be dismissed immediately and without notice, and your salary and any other benefits will cease on that date.

Length of warning

Warnings will usually remain live for the following period from the written confirmation date:

- First written warning: 6 months
- Final written warning: 12 months

Following the expiry date of a warning, the warning will no longer be live and will not normally be taken into account in any future case of misconduct. However, the record of the warning will remain on your personnel record.

The right of appeal

You have the right to appeal against any disciplinary sanction issued by the panel to you. If you wish to do so, you must do it in writing, within 5 working days of the date of the letter confirming the outcome of the disciplinary meeting. The appeal letter should be addressed to the person named in the outcome confirmation letter, and copied to your local HR contact, setting out clearly the detailed reason(s) for the appeal and including any supporting evidence. To progress matters as quickly as possible, it's helpful for you to indicate your availability and your accompanying colleague's availability for an appeal meeting in the appeal letter.

Where you are appealing against dismissal, the date on which dismissal takes effect will not be delayed pending the outcome of the appeal. However, if the appeal is upheld, you will be reinstated as from the termination date with no loss of continuity of service or salary and benefits.

Appeal meeting

You will be required to attend an appeal meeting with 2 independent Acuiti Labs representatives. These are usually a senior member of Acuiti Labs and an HR representative, neither of whom will have had any prior involvement in the case.

The appeal panel will undertake a review of all matters and shall have the power to overturn the decision made, impose a different outcome or uphold the original decision as appropriate. The appeal panel will confirm its decision to you in writing as soon as possible and without unreasonable delay, usually within 1 week of the appeal meeting. Your RM and HR contact will also be advised of the outcome and of any follow-up action required.

Employee Responsibilities

All employees of Acuiti Labs are expected to:

- **Adhere to Company Policies:** Follow all company policies, procedures, and employment terms as outlined in their employment contracts, offer letters, and/or the company handbook.
- **Maintain Professional Conduct:** Conduct themselves in a manner that reflects the company's values and principles, both personally and professionally.

- **Report Violations:** Promptly report any instances of misconduct, policy violations, or unethical behavior to their immediate supervisor, HR department, or through designated reporting channels without fear of retaliation.
- **Seek Clarifications:** Seek clarification from supervisors or HR if they are uncertain about any aspect of the company's policies or their responsibilities.

Manager Responsibilities

Managers at Acuiti Labs play a crucial role in maintaining discipline and are expected to:

- **Lead by Example:** Exhibit high standards of conduct and integrity, serving as role models for their teams.
- **Communicate Expectations:** Clearly communicate the company's policies, performance standards, and behavioral expectations to all team members.
- **Monitor Performance and Conduct:** Regularly monitor employee performance and conduct, providing feedback and addressing any issues promptly.
- **Enforce Policies:** Ensure consistent and fair enforcement of company policies and disciplinary procedures across their teams.
- **Support and Guide Employees:** Provide support and guidance to employees, helping them understand and comply with company policies and addressing any concerns they may have.
- **Document Incidents:** Accurately document any incidents of misconduct or performance issues and the steps taken to address them.
- **Prevent Retaliation:** Prevent any form of retaliation against employees who report misconduct or cooperate with investigations.

Examples of gross misconduct

The following is a list giving examples of what Acuiti Labs considers to be gross misconduct. It is illustrative only and not an exhaustive list:

- Any serious ethics infringement
- Theft, fraud or any form of financial crime, including expense and timesheet irregularities or any breach of Acuiti Labs risk policies. Participating in illegal activities or unethical conduct that severely impacts Acuiti Labs' reputation, operations, or ability to comply with laws and regulations. This includes fraud, bribery, corruption, and other serious violations of Acuiti Labs' code of conduct and ethical guidelines.
- Actual or threatened violence or behaviour towards another employee, partner, contractor, client or supplier of Acuiti Labs.
- Deliberate and/or serious damage or misuse of Acuiti Labs property, including serious abuse of IT systems.
- Misuse of Acuiti Labs name and/or bringing Acuiti Labs name into disrepute in any form, including online or on any app, social networking site or forum (which may include being named in or causing Acuiti Labs to be named in a published statement by the FCA, PRA or any other regulatory body).
- Serious or repeated breach of the rules of a professional body and/or Acuiti Labs professional operating manuals, any of its policies or procedures, ethics and independence rules, health and safety rules.
- Incapability at work brought about by the misuse of alcohol or drugs.
- Conviction of a criminal offence that has an impact on the ability to carry out the individual's role or which calls into question the individual's integrity or brings Acuiti Labs reputation into disrepute.
- Behaviour that amounts to discrimination, victimisation, bullying or harassment.
- Negligence causing loss, damage or injury to Acuiti Labs property.
- Unauthorised use or disclosure of confidential information including the misuse of information and/or IP brought by an employee from a previous employer onto Acuiti Labs systems.
- Failure to follow a reasonable instruction of a Reporting Manager, Project Manager or other authorised person.
- A serious or repeated breach of Acuiti Labs values and/or code of conduct.
- Making allegations in bad faith against a colleague.
- Serious or numerous breaches of Acuiti Labs expenses policy.

- Sharing or requesting the answers to any internal or external training assessments, whether mandatory or otherwise.
- Using answers received from others to complete any internal or external training assessments, whether mandatory or otherwise.
- Any form of plagiarism, unauthorised third party assistance or other integrity concern identified in relation to any internal or external assessment, whether mandatory or otherwise.
- Exhibiting gross negligence in performing job duties, leading to significant errors or damages.
- Unauthorized disclosure of confidential company information, misrepresentation of data, background verification (BGV) failure, unauthorized access. data mishandling or failure to safeguard company assets.
- Deliberately disregarding or violating critical safety protocols or procedures, especially when these actions endanger the health and lives of others. This includes gross negligence in adhering to company safety standards.
- Working from abroad without our prior written approval and satisfaction of any relevant requirements (including but not limited to any applicable immigration requirements).
- Repeatedly working from home contrary to the terms of your employment contract and without the prior approval of your line manager.
- Refusal to disclose any of the information required by your employment or any other information that may have a bearing on the performance of your duties.
- Giving false information as to qualifications or entitlement to work (including immigration status) in order to gain employment or other benefits.

Reporting Misconduct

Reporting misconduct is the first step in the disciplinary process. This ensures that all employees can raise concerns without fear of retaliation.

- **HRMS Helpdesk Access:** Use the Helpdesk feature available in your HRMS portal to raise any concerns, issues, or queries related to this policy or other HR-related matters.
- **Category Selection:** Navigate to the "Helpdesk" section and select the most relevant category to ensure your query is directed to the right department or individual.
- **Ticket Routing:** Once submitted, tickets will be automatically routed to the intended person or department for resolution.
- **Response Timeframes:** Queries will be addressed in accordance with the defined Service Level Agreements (SLAs) to ensure timely responses and efficient handling.
- **Trackable Progress:** The system allows you to track the status of your query, providing transparency and peace of mind.