



# Global Credit Data

## HR Policy Manual

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Global Credit Data  
P.O. Box 49  
2810 AA, Reeuwijk  
THE NETHERLANDS  
[www.globalcreditdata.org](http://www.globalcreditdata.org)

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## Introduction

### Global Credit Data HR Policy Manual

This Human Resources Policy Manual is provided as a central reference for all managers, supervisors, full time consultants and employees and applies to staff across all locations where Global Credit Data carries out its work.

The specific policies that follow promote the philosophy of Global Credit Data with regard to standards of work; terms of employment; employee development; and employee services.

It may be necessary to change these policies from time to time to reflect changes in the workforce, employment trends, economic conditions and legislation. However, any changes in policy will be consistent with Global Credit Data's approach to:

- Employing talented individuals whose creativity and imagination will support and contribute to achieving Global Credit Data's and its members' objectives;
- Communicating GCD's standards and expectations in all aspects of employment including performance;
- Valuing diversity, and assuring equal employment opportunity and a workplace where relationships are based on mutual respect;
- Treating all staff, workers, contractors and members in a professional, non-discriminatory manner;
- Providing safe, effective working conditions, and;
- Providing competitive terms and conditions in our workplace market

Any Policy changes will be consulted with and communicated to all staff through normal communication channels. This Policy Manual will also be updated as necessary.

This Policy Manual should be read in conjunction with Global Credit Data's Articles of Association, Data Pool Regulations and Information Protection Policy.

Theo Van Drunen

Chairman of the Board

October 29<sup>th</sup>, 2020

## Use of this manual - *please read first*

### **Background and purpose:**

The Global Credit Data Consortium is registered in Netherlands as an Association and is referred to herein as “Global Credit Data” or “GCD”.

GCD’s mission requires it to collect, aggregate and share credit data which is provided by its members. This data varies from borrower level information through to aggregated statistics and even bank model parameters from time to time. All of this data is confidential for the following reasons: viewing the data submitted by a single bank could give information about a bank’s portfolio or practices; viewing the database as a whole is only allowed for member banks on a give to get basis.

GCD exists for the purpose of promoting its members’ joint aims in improving their ability to measure and manage credit risk and therefore GCD’s staff need to flexibly support the long term but changing needs of the members.

This document details the standards and rules which GCD, its managers and its executives will work by in the area of human resources.

### **Applicability:**

This document applies to GCD Executives. Where other businesses use the word “staff”, “employee” or “human resource”, GCD uses the word “Executive” which we feel correctly states the person’s functional responsibility to carry out or “execute” the mandate given by the members through General Meetings, Board Meetings, Methodology Committee and other empowered groupings within GCD.

The term “Executive” also applies to contract staff working either full time or part time for GCD, directly or through companies, on long term or short term contracts. In this document we use the words “staff”, “employee” and “executive” interchangeably

### **Interaction with employment and other laws:**

GCD has executives based in many different countries, but the most common is The Netherlands. This manual has been written to set out GCD’s policies and rules in a common way for all executives, however local employment laws and other laws pertaining to the country of residence or country of employment of the executive shall always prevail. To be clear, where the manual states specific rules regarding sick leave, dismissal or any other matter, managers and executives should always refer to the employment law of the country of employment of the executive for the final ruling, if contradictory.

### **Rules vs Policies:**

This manual contains both policies and specific rules, mixed in a way which tries to explain the reasoning for the rules. If it is unclear as to whether a statement is a policy or a rule then please refer to your manager for guidance.

**Interaction with other GCD Documents:**

This policy is subordinate to the overall rules for operation and security set out in Global Credit Data’s Articles of Association, Data Pool Regulations and Information Protection Policy. Terms used in the above documents are applicable to this policy.

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**SECTION 1 – EMPLOYING STAFF: *Employing staff fairly and expertly, ensuring they are properly inducted, and ensuring they are aware of the required standards of business conduct including use of email and the internet.***

## 1.1 Recruitment and Selection

### 1.1.1 Introduction

1.1.1.1 Effective recruitment and selection is central and crucial to the successful functioning of Global Credit Data. It depends on finding people with the necessary skills, expertise and qualifications to deliver Global Credit Data's strategic objectives and the ability to make a positive contribution to the values and aims of the organisation and our members.

“Effective recruitment and selection is central and crucial ... to deliver Global Credit Data's strategic objectives and ... make a positive contribution to the values and aims of the organization ...”

### 1.1.2 Advertisements

1.1.2.1 Vacancies will generally be advertised in an appropriate industry media, and will not be confined to those media which, because of their particular source of applicants, provide only or mainly applicants of a particular group.

1.1.2.2 All vacancies will also be posted on Global Credit Data Intranet, and internal notice boards. Global Credit Data is keen to facilitate internal promotions wherever possible as development opportunities for its staff.

1.1.2.3 Global Credit Data may, on occasions, decide to restrict advertisement to internal candidates only in order to provide continuous development of existing members of staff unless the Management team agrees that this is not appropriate due to the specialist skills required for the post involved.

1.1.2.4 Global Credit Data shall not directly approach staff of its member companies, however employment consultants may do so in the normal course of their work in seeking candidates, providing that Global Credit Data does not provide to them any names of persons at member companies.

1.1.2.5 Vacancies, which are restricted to internal candidates only will be clearly indicated on the advertisement. All internal candidates will be selected for interview on the same criteria as external candidates.

1.1.2.6 Employees on maternity leave will receive all advertisements for posts advertised in Global Credit Data during their period of maternity leave.

### 1.1.3 Job Description and application

1.1.3.1 In applying for posts, all candidates will be provided with a job description, details of the appropriate conditions of service and details about Global Credit Data. A brief statement about the appointment procedure will also be provided. The job description will include a list of the main duties and responsibilities of the post, together with an outline of the qualifications and experience which candidates are expected to possess.

- 1.1.3.2 In drawing up the job description and conditions of service Global Credit Data will ensure that no job applicant receives less favourable treatment than another on the grounds of disability, gender, race, religion or belief, age, sexual orientation, marital status, parental status or caring responsibilities, and that no applicant is placed at a disadvantage unjustifiably by requirements or conditions which have a disproportionately adverse effect on a particular group.
- 1.1.3.3 Applicants with a disability who meet the essential criteria for a job will be interviewed, and considered on their merits
- 1.1.3.4 Applicants will be required to supply the names and addresses of two people from whom references can be obtained, one of which should normally be the applicant's current or most recent employer.
- 1.1.3.5 Only references for short listed candidates for interview will be obtained.
- 1.1.3.6 References should normally be made in writing or email, but those received by telephone will be accepted, provided that a note of the conversation is recorded and placed on file.
- 1.1.3.7 All candidates will be asked to declare on the application form whether they have ever been convicted of any criminal offence.
- 1.1.3.8 Applicants will also be required to declare if they are related to any employee within Global Credit Data. No manager should be put into a position where he or she is asked to interview a person to whom they are related.
- 1.1.3.9 It is Global Credit Data's policy not to communicate further with applicants other than those who are shortlisted.
- 1.1.3.10 Applicants' details will be recorded at the point of receipt by the responsible hiring manager.
- 1.1.3.11 All completed application forms are private and confidential and should only be made available to those directly involved in the recruitment and selection process.
- 1.1.3.12 A shortlist of candidates will be drawn up for interview, based entirely on merit and suitability for the post. Other than in exceptional circumstances, reasonable notice will be given to ensure that candidates have sufficient time in order to prepare for and make the necessary arrangements to attend the interview.

#### 1.1.4 Selection Methods

- 1.1.4.1 Interviews with shortlisted candidates may be held by the employing manager, another manager or a panel, which may or may not include Board members.
- 1.1.4.2 If there is only one initial interviewer then at least the top two candidates will be interviewed by a second manager before any decision is made. In the case of disagreement then the hiring decision and potentially a further interview shall be referred upwards to the Chief Executive, the Board or the Chairman of the Board as appropriate.

- 1.1.4.3 The selection and appointment of the Chief Executive will be made by members of the Board and the panel will be chaired by the Board Chairman.
- 1.1.4.4 A set of questions will be agreed by the interview panel in advance and will be developed from the current job description for the post. The panel will seek to develop questions which ask the candidates to give examples of their previous relevant experience
- 1.1.4.5 It should be remembered that an interview is a two way process, and candidates will be given every opportunity to ask questions about Global Credit Data, to ensure that they have a full understanding of the post for which they are applying and the way Global Credit Data operates.
- 1.1.4.6 In addition to interviews, a range of other selection techniques may be used. In such circumstances reasonable notice and relevant information will be given to ensure that candidates have sufficient time and information to prepare.
- 1.1.4.7 Candidates attending an interview will be reimbursed any reasonable travel expenses incurred if agreed in advance, which would normally be at the appropriate second-class rail fare or economy airfare as appropriate.
- 1.1.4.8 A candidate who withdraws or refuses an offer of appointment for reasons considered by Global Credit Data to be inadequate will not be reimbursed his/her expenses.
- 1.1.4.9 All appointments will be made strictly on merit and related to the requirements of the job.
- 1.1.4.10 The Chief Executive has delegated powers to make appointments to posts below Director-level or equivalent. For Director-level posts the Chief Executive will consult with the Chairman to determine Board Members' level of involvement.
- 1.1.4.11 All interviewed candidates will be notified of the outcome of the selection process as soon as possible, usually by email.
- 1.1.4.12 All unsuccessful candidates' application forms and interview notes will be retained for one year from the date of interviews taking place. After this date they will be destroyed.

### 1.1.5 Relevant Checks

As GCD has executives based in many different countries the relevant checks including criminal background screening must be completed in compliance with local laws of the country of employment. These checks shall address the following elements: minimum lookback period, self-reporting requirements, re-employment requirement, unlimited geographical scope of the criminal background screening.

1.1.5.1 All offers of employment will be made conditional upon satisfactory results from the following:

- Proof of identity
- Check of pertinent CV information (University Degree, prior employers for last 5 years)
- two satisfactory references if deemed necessary
- confirmation of the right to work in the country (if residence country different to citizenship)
- Criminal Records Disclosure if deemed necessary
- Credit check if deemed necessary
- Check name of new hire with the following list: <https://sanctionssearch.ofac.treas.gov/> ( Office of Foreign Assets Control (OFAC) screening)
- Other checks if deemed necessary dependent on country of employment, role, etc.

### 1.1.6 Probationary Period

1.1.6.1 All appointments into Global Credit Data will be made subject to a probationary period of six calendar months or such shorter period as set out in the law of the country of residence of the employee. After three months a review meeting will take place between the post holder and their line manager to discuss progress. At the end of the probationary period, and subject to a satisfactory report by the appropriate head of section or line manager, employees will be notified in writing that they have successfully completed their probationary period. The probationary period can be extended by a further 3 months should the individual's line manager consider this appropriate.

### 1.1.7 Recruitment Monitoring

1.1.7.1 Global Credit Data seeks to recruit employees on the basis of their ability and the requirements of the post.

1.1.7.2 Global Credit Data wants to ensure that no applicant receives less favourable treatment than another on the grounds of disability, gender, race, religion or belief, age, sexual orientation, marital status, parental status or caring responsibilities.

### 1.1.8 Exit Interviews

1.1.8.1 All employees who leave the employment of Global Credit Data voluntarily will have an exit interview with their manager before their last day of employment.

1.1.8.2 Exit interviews provide the opportunity for departing employees to discuss their reasons for leaving. The information provided is useful in identifying trends, learning and development and evaluating the effectiveness of HR policies and practices.

1.1.8.3 The appropriate line manager should receive all appropriate information, such as recommendations made for change, or significant issues raised in the questionnaire, whilst bearing in mind confidentiality issues. The exit interview report or questionnaire will be retained on the employee's personal file.

## 1.2 Induction Policy and Checklist

### 1.2.1 General Policy Statement

Global Credit Data believes that all new employees should be given timely induction training. This training is regarded as a vital part of staff recruitment and integration into the working environment. This policy, associated procedures and guidelines define Global Credit Data's commitment to ensure that all staff are supported during the period of induction, to the benefit of the employee and Company alike.

“Global Credit Data believes its executives are its greatest asset (aside from the members' data) and recognises its responsibility to ensure they are afforded appropriate development throughout their employment. This development begins at the Induction stage when a new employee joins.”

### 1.2.2 Aim

It is the aim of Global Credit Data to ensure that staff induction is dealt with in an organised and consistent manner, to enable staff to be introduced into a new post and working environment quickly, so that they can contribute effectively as soon as possible. This induction policy, associated procedures and guidelines aim to set out general steps for managers and staff to follow during the induction process. It is expected that all managers and staff will adhere to this policy.

Global Credit Data expects that the implementation of good induction practice by managers/supervisors will:

- Enable new employees to settle into Global Credit Data quickly and become productive and efficient members of staff within a short period of time.
- Ensure that new entrants are highly motivated and that this motivation is reinforced.
- Assist in reducing staff turnover, lateness, absenteeism and poor performance generally.
- Assist in developing a management style where the emphasis is on cooperation and service to members.
- Ensure that employees deal safely with the confidential information of GCD and its members.
- Reduce costs associated with repeated recruitment, training and lost production.

## GUIDELINES FOR MANAGERS/SUPERVISORS

### 1.2.3 General

Starting a new job is a demanding and often stressful experience. Quite apart from the obvious challenge of tackling new tasks, there is also the need to become accustomed to a new organisation, a new environment and new colleagues. The purpose of induction is to support new employees during this difficult period and to help them become fully integrated into Global Credit Data as quickly and as easily as possible.

Induction has benefits for all involved in the process. Employees who settle quickly into Global Credit Data will become productive and efficient at an early stage and in turn will experience feelings of worth and satisfaction.

It is generally recognised that new employees are highly motivated and an effective induction process will ensure that this motivation is reinforced.

#### 1.2.4 First Day of Employment

Preparations should be made for the arrival of the new entrant well in advance, for example, arrangements should be made to provide access to systems and data, communications and any hardware required.

Most new employees tend to be concerned primarily with two matters:

- a) whether they can do the job and
- b) how they will get on with their new colleagues.

It is therefore important to introduce them to their new workplace and colleagues at the earliest opportunity. An introductory talk will be appropriate at this time and can be combined with the provision of general information and exchanging any necessary documentation. Where possible this talk should take place face to face, whether physically or by skype/webex etc. This talk should be as brief as possible, because the employee is unlikely to be receptive to detailed information at this stage, and should be conducted by someone who is well prepared and has sufficient time available.

An explanation document should be made available to the new entrant allowing Global Credit Data / Department to be viewed as a whole and the recruit to see where he/she fits into the organisation.

The new entrant will want to get to know his/her colleagues and quickly become part of the team and time should be made for this process. Colleagues should be briefed on the new entrant's arrival. If possible one of the new entrant's colleagues should be nominated to ensure that he/she has every assistance in settling in quickly.

#### 1.2.5 Completing the Induction Process

Induction can be said to end when the individual becomes fully integrated into the organisation. Of course, there is no set timescale within which this will happen and follow up is essential. Giving new employees the opportunity to ask questions several weeks into employment can be useful, and the induction checklist will provide this opportunity. In some areas, such as understanding wider aspects of the organisation, follow up after a number of months may be appropriate.

A suggested checklist below should be used



**ITEMS TO COVER WITH EACH NEW EMPLOYEE**

<b>The Department</b>	<b>Complete</b>
1. Department function	
2. Introduction to colleagues	
3. New entrant’s own job	
4. Supervision	
5. Communication	
6. Tools, software	
7. Rules	
<b>Conditions of Employment</b>	
1. Information on hours of work, including on call times for members	
2. Time recording, flexi-time	
3. Travel costs, allowances	
4. Probationary periods of employment	
5. Company Pension scheme and eligibility	
6. Reporting in when sick including when on leave	
7. Arrangements for requesting leave: annual leave, unpaid leave, compassionate leave	
<b>Data Confidentiality Procedures</b>	
1. Data Protection Policy and procedures	
2. Passwords and computing safety rules	
3. Laptop rules	
4. Notification of loss of equipment or suspected loss of data	
5. Major Incident procedures	
<b>Conduct</b>	
1. Personal presentation	
2. Disciplinary procedures	
3. Courtesy to the members and the public	
4. Confidentiality	
5. Acceptance of gifts	
6. Statements to the Press	
7. Standards of Business Conduct	
<b>Education, Training, Promotion</b>	
1. Training opportunities	
2. Employee appraisal, review systems	
<b>Employee Involvement and Communication</b>	
1. Communication arrangements	
2. Handling Complaints	
<b>Items Specific to Department</b>	
1. Pay	
2. Notice of termination of employment	
3. Sickness absence from work certificates	

## 1.3 Employee Conditions and Contracts

### 1.3.1 General Policy Statement

Global Credit Data will agree reasonable terms and conditions individually with each employee, reflecting their duties, work environment and relevant laws and industry standards of the place where the employee is working.

### 1.3.2 Employment Contract

Each employee shall commence with an employment contract, which includes all relevant details of working conditions, including:

- Salary
- Allowances
- Overtime/flexitime
- Expected hours of work
- Vacation
- Pension
- Any other conditions required to be specified in employment agreements in the place where the employee will be working

The employment contract shall also include a standard secrecy clause and require acceptance by the employee of GCD's information secrecy policies and procedures.

### 1.3.3 Salary, benefits and Conditions

Global Credit Data will agree reasonable terms and conditions individually with each employee, reflecting their duties, work environment and relevant laws and industry standards of the place where the employee is working. GCD will respect the employment laws in the country of employment of the employee with respect to maternity leave and any other types of leave or working hour restrictions.

GCD will annually review the development of salaries, benefits and conditions for finance industry employees in the country of employment, however employee performance, changing duties and GCD's financial capacity shall also be considered by the Board and management in setting salaries, benefits and conditions.

### 1.3.4 Special arrangements

Aside from what is written in the employee contract and what is required under the laws of the country of employment, GCD may agree to special arrangements at its absolute discretion, including part time work, flexible work hours, leave without pay, long service leave, bereavement leave, family or parental care and support, etc.

### 1.3.5 Family or Parental support

GCD will respect and comply with the employment laws governing parental support for the country of residence of each employee. In addition to this, GCD will consider making special arrangements with the employee to assist them during family events or special circumstances, on a time limited or durable period. Such assistance shall be considered for both male and female employees, employed and long-term contract workers, as well as those working full and part time.

GCD will consider the specific conditions of each circumstance: amount of government support; availability of the parent to work during the period; cost of living; etc. GCD's aim is to ensure that its long-term employees are not unduly disadvantaged by their role and duties as close relatives in their family and remain motivated to perform their best for GCD when they return to full time work as well as supplying essential information to other employees when needed during their leave.

GCD will consider flexibility of working hours, need for maintenance of pension and sickness insurance payments and cases of very low government payments compared to cost of living. Each case shall be considered individually, as circumstances differ widely.

## 1.4 Standards of Business Conduct

### 1.4.1 Introduction

1.4.1.1 Global Credit Data expects its staff (including temporary, agency, interim, contractor or consultant staff) to be scrupulously impartial and honest in all affairs relating to Global Credit Data and their job within it. All staff also bear a responsibility as employees to act as ambassadors for Global Credit Data in terms of their general conduct both within and outside the organisation. This policy outlines the responsibilities of staff working for Global Credit Data.

1.4.1.2 The duties of an employee are embodied in laws in their country of residence and or employment

1.4.1.3 In general the duties of an employee are as follows:

- to be ready and willing to work;
- to offer their services personally: for example must not subcontract the work for which they are employed;
- to take reasonable care in the exercise of that service, including the duty to be competent at work and to take care of Global Credit Data's property;
- to not wilfully disrupt Global Credit Data's business;
- to obey reasonable orders as to the time, place, nature and method of service;
- to work only for Global Credit Data in Global Credit Data's time;
- to disclose information to Global Credit Data relevant to Global Credit Data's business: for example that they might know or discover;
- to hold solely for Global Credit Data the benefit of any invention relevant to the business on which Global Credit Data is engaged;
- to respect Global Credit Data's trade secrets;
- in general, to be of good faith and do nothing to destroy the trust and confidence necessary for employment;
- to account for all benefits – monetary or in kind - received in the course of employment;
- to indemnify the employer for loss caused by the employee.

1.4.1.4 Dutch law and other laws place further responsibilities on individual employees in regards to their own behaviour and their behaviour towards other employees.

“Executives shall not, directly or indirectly, engage in, or have any interest, financial or otherwise, in any other business enterprise which interferes or is likely to interfere with your independent exercise of judgement in Global Credit Data's best interest.”

*...if in any doubt then declare the interest and ask whether it is allowed...*

## 1.4.2 Standard of Conduct Required by Global Credit Data

### 1.4.2.1 Gifts and Hospitality

In addition to the duties placed on employees by Civil and Statute Law. Global Credit Data requires its employees to ensure that gifts and hospitality offered by suppliers and potential suppliers of goods and services to Global Credit Data are declined. This applies, whether the gifts or hospitality are offered within, or outside normal working hours. The only exceptions to this are trivial gifts with a nominal value of less than €50 such as a calendar, diary, chocolates or mugs can be accepted. All other gifts must be politely refused or, if received through the post, returned to the donor with a suitably worded letter signed by the Department Manager.

### 1.4.2.2 Transaction of Private Business

Employees having official dealings with contractors and other suppliers of goods or services must avoid transacting any kind of private business with them by any means other than Global Credit Data's normal commercial channels. No favour or preferences as regards price, or otherwise, which is not generally available, should be sought or accepted.

### 1.4.2.3 Visits to Conferences, Demonstrations etc.

Global Credit Data intends that when it is necessary for employees to visit conferences, demonstrations and similar occasions, GCD should pay the travelling and subsistence expenses, not the conference host. Exceptions to this general rule will only be permitted with the approval of the Chief Executive.

### 1.4.2.4 Attendance at Luncheons, Receptions etc.

Where it is evident that the work of Global Credit Data will be facilitated, invitations to attend receptions, luncheons may be accepted under the following rules:

- no employee may accept an invitation without first obtaining the approval of the Department Manager;
- in exceptional circumstances, where it is not possible to seek prior approval, the facts should be reported immediately afterwards;
- if addressed personally, such an invitation may not be transferred to another employee, except with the consent and approval of a senior manager as above and with the concurrence of the party issuing the invitation;
- invitations involving attendance outside normal working hours may be accepted only on the authority of the Departmental Manager;
- as a general rule, any officer who has any doubts about the wisdom of accepting any hospitality should decline the offer.

### 1.4.2.5 Confidentiality

At all times confidentiality must be maintained. No information can be released to unauthorised persons or organisations. The Chief Executive or other Managers of Global Credit Data will inform employees of those authorised to receive information.

If doubt exists as to the validity of an organisation or individuals to receive information, this must be checked with a Manager.

#### **1.4.2.6 Personal Relationships**

If a personal relationship between two employees develops within the working environment, the onus is on the senior employee concerned to bring this to the attention of his or her manager to confirm that there is no conflict of interest, nor will a conflict of interest arise. Global Credit Data reserves the right to move (either place of work or area of work) one of the employees concerned if it deems it necessary to do so.

#### **1.4.2.7 Outside Interests and Employment**

Outside interests include directorships, ownership, part ownership or material shareholdings in companies, business or consultancies doing business with or likely to seek to do business with the Global Credit Data. These should be declared to the individual's line manager as should the interests of a spouse / partner or close relative.

#### **1.4.2.8 Political and civic activities**

It is not the intention of Global Credit Data, or this policy, to dissuade employees from participating actively in public duties. It is important, however, that by doing so there is no suggestion to a third party that the employee is acting on behalf of, or with the support of, Global Credit Data. To avoid any misunderstanding, no GCD employee should permit his or her company affiliation to be noted in any outside organisation's materials or activities without the express written approval of a member of management.

#### **1.4.2.9 Bribery and Corruption**

Global Credit Data has a strict anti-bribery and corruption policy. A bribe is defined as: giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.

If you bribe (or attempt to bribe) another person, intending either to obtain or retain business for Global Credit Data, or to obtain or retain an advantage in the conduct of Global Credit Data's business this will be considered gross misconduct. Similarly accepting or allowing another person to accept a bribe will be considered gross misconduct. In these circumstances you will be subject to formal investigation under Global Credit Data's disciplinary procedures, and disciplinary action up to and including dismissal may be applied.

#### **1.4.2.10 General Conduct**

Employees should at all times conduct themselves in such a way as to enhance the reputation of Global Credit Data.

Global Credit Data will support employees who become aware of and are willing to report breaches of this policy or who genuinely believe that a breach is occurring, has occurred or is likely to occur within the business. Employees should raise the issue internally with their manager or supervisor or in accordance with the whistleblowing section of this document.

These standards of conduct are intended to underpin and clarify standards required by Global Credit Data of its employees and form a fundamental part of the employment contract. Staff who fail to comply with the guidance detailed in this Policy could be subject, following full investigation, to disciplinary action up to and including dismissal. If through their actions or omissions staff are found to be in contravention of either this Policy or, indeed, their legal responsibilities then Global Credit Data reserves the right to take legal action if it deems it to be necessary to do so.

## 1.5 Internet and Email Usage Policy and Guidelines

### 1.5.1 Introduction

1.5.1.1 This policy sets out the obligations and expectations on employees of Global Credit Data including contractors and temporary staff, who use Global Credit Data's IT facilities for internet and email purposes. IT facilities are provided to assist with day to day work. It is important that they are used responsibly, are not abused, and that individuals understand the legal professional and ethical obligations that apply to them.

### 1.5.2 Authorisation

1.5.2.1 No person is allowed to use Company IT facilities who has not previously been authorised to do so by Global Credit Data's management. Unauthorised access to IT facilities is prohibited and may result in either disciplinary action or criminal prosecution.

### 1.5.3 Responsibilities

1.5.3.1 All Users are expected to act in a manner that will not cause damage to IT facilities or disrupt IT services. Any accidental damage or disruption must be reported to IT / Line Manager as soon as possible after the incident has occurred. Users are responsible for any IT activity which is initiated under their username.

"If you have access to Global Credit Data's computers including email and access to the internet as part of your job, you must not abuse this by using these facilities for purposes unrelated to Company business."

#### 1.5.3.2 Use of the Internet provided by GCD or through GCD hardware

GCD executives may have been provided with a laptop or other hardware and may have been provided with access to the internet under GCD's cost or name. The following comments relate to use of the internet by the executive during work time, or over GCD supplied internet connection or using GCD equipment. Use of the Internet by employees is encouraged where such use is consistent with their work and with the goals and objectives of Global Credit Data in mind.

- Users must not participate in any online activities that are likely to bring Global Credit Data into disrepute, create or transmit material that might be defamatory or incur liability on the part of Global Credit Data, or adversely impact on the image of Global Credit Data.
- Users must not visit, view or download any material from an internet site which contains illegal or inappropriate material. This includes, but is not limited to, pornography (including child pornography), obscene matter, race-hate material, messages condoning violence, criminal skills, terrorism, cults, gambling and illegal drugs.
- Users must not knowingly introduce any form of computer virus into Global Credit Data's computer networks or hardware.



- Personal use of the internet must not cause an increase for significant resource demand, e.g. storage, capacity, speed or degrade system performance.
- Users must not “hack into” unauthorised areas.
- Users must not download commercial software or any copyrighted materials belonging to third parties, unless such downloads are covered or permitted under a commercial agreement or other such licence.
- Users must not use the internet for personal financial gain.
- Users must not use the Internet for illegal or criminal activities, such as, but not limited to, software and music piracy, terrorism, fraud, or the sale of illegal drugs.
- Users must not use the internet to send offensive or harassing material to other users.
- Use of the internet for personal reasons (e.g. online banking, shopping, information surfing) must be limited, reasonable and done only during non-work time.
- Staff may face disciplinary action or other sanctions (see below) if they breach this policy and/or cause embarrassment to Global Credit Data or bring it into disrepute.

### 1.5.3.3 Use of Email

Emails sent or received on the GCD email system form part of the official records of Global Credit Data; they are not private property. Global Credit Data does not recognise any right of employees to impose restrictions on disclosure of emails within Global Credit Data. Emails may need to be disclosed as part of legal proceedings (e.g. tribunals), and as part of disciplinary proceedings. Users are responsible for all actions relating to their email account/pc username and should therefore make every effort to ensure no other person has access to their account.

When using Company email, users must:

- ensure they do not disrupt Global Credit Data’s wider IT systems or cause an increase for significant resource demand in storage, capacity, speed or system performance e.g. by sending large attachment to a large number of internal recipients.
- ensure they do not harm Global Credit Data’s reputation, bring it into disrepute, incur liability on the part of Global Credit Data, or adversely impact on its image.
- not seek to gain access to restricted areas of the network or other “hacking activities”
- not use email for the creation, retention or distribution of disruptive or offensive messages, images, materials or software that include offensive or abusive comments about ethnicity or nationality, gender, disabilities, age, sexual orientation, appearance, religious beliefs and practices, political beliefs or social background. Employees who receive emails with this content from other employees of Global Credit Data should report the matter to their line manager or supervisor.
- not send email messages that might reasonably be considered by recipients to be bullying, harassing, abusive, malicious, discriminatory, defamatory, and libellous or contain illegal or offensive material, or foul language.

- not upload, download, use, retain, distribute, or disseminate any images, text, materials, or software which might reasonably be considered indecent, obscene, pornographic, or illegal.
- not engage in any activity that is likely to
  - Corrupt or destroy other users' data or disrupt the work of other users
  - Waste staff effort or Company resources, or engage in activities that serve to deny service to other users
  - Be outside of the scope of normal work-related duties – for example, unauthorised selling/advertising of goods and services
  - Affect or have the potential to affect the performance of damage or overload Global Credit Data system, network, and/or external communications in any way
  - Be a breach of copyright or license provision with respect to both programs and data, including intellectual property rights
  
- not send chain letters or joke emails from a Company account.

Staff who receive improper email from individuals inside or outside Global Credit Data, should discuss the matter in the first instance with their line manager or supervisor.

Personal use of Global Credit Data email is **not** permitted.

#### 1.5.4 Good Practice

- 1.5.4.1 Global Credit Data has good practice guidelines for dealing with email when staff are out of the office for longer than three days. When activating the "out of office" facility messages should name an alternative employee for correspondents to contact if necessary. This will ensure that any important messages are picked up and dealt with within required timescales.
- 1.5.4.2 During periods of absence when highly important emails are anticipated, the employee (or manager) should make arrangements for notification and access by another appropriate employee.
- 1.5.4.3 Where sensitive and confidential information needs to be sent via email for practical reasons, please be aware that email is essentially a non-confidential means of communication. Emails can easily be forwarded or archived without the original sender's knowledge. They may be read by persons other than those they are intended for.
- 1.5.4.4 Users must exercise due care when writing emails to avoid being rude or unnecessarily terse. Emails sent from Global Credit Data may be interpreted by others as Company statements. Users are responsible for ensuring that their content and tone is appropriate. Emails often need to be as formal and business-like as other forms of written correspondence.
- 1.5.4.5 Users should delete all personal emails and attachments when they have been read and should also delete all unsolicited junk mail. In the process of archiving emails, users should ensure inappropriate material is not archived

1.5.4.6 Global Credit Data requires employees to have a current and up to date automatic virus checker on all computers used for GCD business. However, caution should be used when opening any attachments or emails from unknown senders. Users must use best endeavours to ensure that any file downloaded from the internet is done so from a reliable source. It is a disciplinary offence to disable the virus checker. Any concerns about external emails, including files containing attachments, should be discussed with a Manager.

### 1.5.5 Legitimate Access to Prohibited Material

1.5.5.1 There may be circumstances where Users feels that the nature of their work means that they are required to access or use material prohibited under this policy. If so, this should be discussed with the Line Manager concerned. Global Credit Data is legally responsible for the content and nature of all materials stored on/accessed from its network.

### 1.5.6 Monitoring

1.5.6.1 All resources of Global Credit Data, including computers, email, and voicemail are provided for legitimate use. If there are occasions where it is deemed necessary to examine data beyond that of the normal business activity of Global Credit Data then, at any time and without prior notice, Global Credit Data maintains the right to examine any systems and inspect and review all data recorded in those systems. This will be undertaken by authorised staff only. Any information stored on a GCD provided computer, whether the information is contained on a hard drive, USB pen or in any other manner may be subject to scrutiny by Global Credit Data. This examination helps ensure compliance with internal policies and the law. It supports the performance of internal investigations and assists in the management of information systems.

### 1.5.7 Social Media

Social media, e.g. Facebook, Twitter, LinkedIn, is a normal part of business networking and Global Credit Data employees are expected to use this in a responsible way. The following guidelines explain what is meant by responsible use.

1.5.7.1 Do not post anything on social media sites which is illegal or that is likely to bring you or GCD into disrepute. Remember that comments on social media sites are public and that the language you use could be misconstrued, misunderstood or used mischievously and material you might regard as harmless could be viewed differently by others.

1.5.7.2 Do not publish photos owned or created by another entity without their prior permission and don't do anything which might jeopardise confidential information and/or intellectual property. If you are ever unsure, please discuss this with your manager.

1.5.7.3 Think carefully about your choice of personal photos, especially if you identify yourself as a GCD employee.

- 1.5.7.4 Do not use messaging apps to communicate with members or suppliers about any GCD business. Remember that messaging apps are insecure and unregulated channels and must not be used to send sensitive or commercial information.
- 1.5.7.5 Do not post anything that colleagues, members, clients, suppliers, vendors or other stakeholders could find offensive, racist, homophobic, abusive, degrading, disparaging, derogatory or humiliating. This includes defamatory, discriminatory or libellous comments, insults and anything that may be interpreted as harassment or bullying, hateful or abusive to another person or obscene language or pictures.
- 1.5.7.6 Make sure that you are authorised before giving responses on behalf of GCD to posts or comments about GCD. If in doubt, consult your manager. Third parties may want to debate GCD issues, membership, data standards or other sensitive issues and it may be better to do this in a more private setting or by discussion with all members.
- 1.5.7.7 Do not communicate or publish any non-public, confidential or proprietary information about us, our members, your work or any other information gained through your work.
- 1.5.7.8 Remember your colleagues and other stakeholders might see your post and if you wouldn't want your parents or your manager to read it or a newspaper to publish it, don't post it!

## 1.5.8 Penalties for Improper Use

### 1.5.8.1 Withdrawal of facilities

Users in breach of these regulations may have access to Company IT facilities restricted or withdrawn.

### 1.5.8.2 Disciplinary Action

Breaches of these regulations may be dealt with under Global Credit Data's disciplinary procedures. It may lead to termination of employment from Global Credit Data.

### 1.5.8.3 Breaches of the law

Where appropriate, breaches of the law will be reported to the police.

**SECTION 2 – MANAGING EMPLOYEE PERFORMANCE: *SETTING OBJECTIVES, ASSESSING AND MANAGING EMPLOYEE PERFORMANCE INCLUDING ABSENCES, MISCONDUCT AND CAPABILITY ISSUES***

## 2.1 Performance Appraisal Policy

### 2.1.1 Appraisal Policy

Global Credit Data are committed to supporting every employee to reach their potential and achieve their professional goals, which in turn will assist the organisation to achieve its objectives.

“The appraisal process aims to improve the effectiveness of the organisation leading to a well-motivated and competent workforce”

The performance appraisal policy supports the performance appraisal scheme. The scheme is a formal process centred on an annual meeting of each employee and their line manager to discuss his/her work. The purpose of the meeting is to review the previous year’s achievements and to set objectives for the following year. These should align individual employees’ goals and objectives with organisational goals and objectives.

### 2.1.2 Core Principles of the Appraisal Policy

1. The appraisal process aims to improve the effectiveness of the organisation by contributing to achieving well motivated and competent employees.
2. Appraisal is an ongoing process with an annual formal meeting to review progress.
3. The appraisal discussion is a two way communication exercise to ensure that both the needs of the individual, and of the organisation are being met, and will be met in the next year.
4. The appraisal discussion will review the previous year’s achievement, and will set an agreed Personal Development Plan for the coming year for each employee.
5. All directly employed employees who have completed their probationary period are required to participate in the appraisal process.
6. The appraisal process will be used to identify the individual’s development needs for training and development.
7. The appraisal process will provide management with valuable data to assist succession planning.

### 2.1.3 Performance Appraisal Implementation

Performance appraisal discussions will be held during an agreed period with each employee once per year. They will be arranged by the employee’s line manager. Line managers are encouraged to provide the opportunity for an additional 6 month verbal appraisal review, mid-year and other informal reviews as necessary throughout the year.

The discussion will be held in private. Information shared during the appraisal will be shared only with senior management. The exception is training needs, which may need to be

communicated to other staff members or administration for action. Confidentiality of appraisal will be respected.

The appraiser (usually the employee's line manager) will be expected to be familiar with the employee's work.

All appraisal documents should be issued to both parties prior to the discussion, in order to allow time for both parties to reflect and prepare. These will provide a framework and focus for the discussion.

A time and venue for the discussion will be advised at least one week before the meeting takes place. This discussion will ideally take place in person but may be by electronic means, but should involve face to face contact if possible, e.g. webex or skype.

#### 2.1.4 The Appraisal Discussion

The appraisal discussion will allow an opportunity for both the appraisee, and the appraiser to reflect and comment on the previous year's achievements. It will praise achievement and encourage the appraisee in his/her role.

The appraiser is accountable for giving the employee constructive, timely and honest appraisals of their performance, which should take into account both the goals of the organisation and of the individual.

The discussion should be a positive dialogue, and will focus on assisting the appraisee to acquire the relevant knowledge, skills and competencies to perform his/her current role to the best of his/her abilities.

The appropriate forms will be completed and signed by both parties. The appraisee will be given the opportunity to note any comments that he/she does not agree with and complete a self-assessment.

The appraisee and line manager should agree on a Personal Development plan for the appraisee for the following year. This will reflect the appraisee's aspirations and the organisation's requirements, and should align personal and organisational goals. The organisation and the line manager will support the individual to achieve these goals during the forthcoming year.

Any training needs, future training requirements, planned qualifications, development opportunities and career planning should be discussed in the light of the Personal Development Plan.

2.1.5 Performance Appraisal & Personal Development Plan Pro Forma

<b>Name:</b>	<b>Job Title:</b>
<b>Appraiser</b>	<b>Job Title:</b>
<b>Reviewer</b>	<b>Job Title:</b>

**REVIEW OF LAST YEAR’S OBJECTIVES**

Outline:

- those of last year’s objectives which were achieved successfully
- those which were partly achieved or did not meet timescales and why
- those which were not achieved and why



**REVIEW OF LAST YEAR'S PERSONAL PERFORMANCE**

Focus on recording examples of

- situations where the individual performed well / not so well – what lessons can be learned?
- where they have come across obstacles in the job situation or in their own skills that have prevented them from working effectively – if so what were they and how can they be overcome?
- where their effort was appropriately / inappropriately focused

**OVERALL PERFORMANCE RATING**

Superior       Fully Acceptable       Incomplete       Unsatisfactory

Reason for rating:

**PERSONAL DEVELOPMENT PLAN**

What key skills and competencies are required to allow the individual to meet their job objectives this year and what is their current level of ability / confidence with each of these?

Based on the above, what specific training or development activities would enhance their ability to meet their objectives? (Consider not just training courses, but also activities such as mentoring, shadowing etc.)



## 2.2 Employee Development

### 2.2.1 General Policy

Global Credit Data employees are expected to maintain their competence in line with industry standards throughout their career. Global Credit Data will encourage and assist employees to maintain and improve competence by suggesting and/or paying for training as required in the opinion of GCD.

### 2.2.2 Self education

GCD employees are expected to keep themselves up to date with techniques and industry news as far as reasonably possible.

### 2.2.3 Study leave

GCD will consider employee requests for study leave on either a paid or unpaid basis, at its absolute discretion.

### 2.2.4 Training Courses

GCD expects that its employees will from time to time be required to attend training courses or industry conferences in order to improve skills and knowledge. There is no pre-set amount of training per employee and courses will be considered on a needs, benefit and cost basis.

## 2.3 Controlling Absence Policy

### 2.3.1 Policy

It is recognised by Global Credit Data that from time to time staff may be unable to perform their work due to illness. The length of time lost by employees through illness must however be monitored to ensure that each employee is able to do their job, effectively and without putting themselves or others at risk. It is not the intention of Global Credit Data to penalise the genuinely sick, however it must be recognised that an employee who is medically unfit to carry out his/her contractual duties may not be able to continue in that employment.

Global Credit Data values good attention to work and is committed to improving the general wellbeing of its employees to achieve this. Although we aim to secure regular performance, we do not expect employees to work when they are unwell.

Managers will consider cases of sickness absence on an individual basis and ensure the provision of appropriate support, advice and professional input where appropriate. However, it is recognised that in some cases, patterns/levels of absence will be unacceptable and formal management action will be required.

Employees who become aware that they have an illness problem are encouraged to inform their manager at the earliest opportunity. All such requests will be dealt with as speedily, discretely and compassionately as possible.

In the extreme case of unsatisfactory absence not medically supported, the Manager shall give the employee warning and if there is no improvement may commence dismissal in accordance with relevant employment laws.

In the unfortunate case of long term medical inability to perform the job the Manager shall discuss this with the employee and commence actions to terminate the employment on medical grounds in accordance with relevant employment laws and sickness benefit schemes.

For employees in The Netherlands, the Dutch law procedures for sick leave 'Wet verbetering Poortwachter' shall be followed and sick leave shall be properly registered also at the portal of our social security supplier (Nedasco).

For employees in the Netherlands there are certain other special leave days available, e.g. days for care taking of a sick relative. These are more fully described on the website of the Dutch Government: <https://www.rijksoverheid.nl/onderwerpen/verlofregelingen/vraag-en-antwoord/welke-soorten-verlof-zijn-er>

## 2.4 Disciplinary Procedure

### 2.4.1 Scope

Global Credit Data Disciplinary Procedure will be used only when necessary and as a last resort. Where possible, informal and/or formal counselling or other good management practice will be used to resolve matters prior to any disciplinary action being taken. The procedure is intended to be positive rather than punitive but takes cognisance of the fact that sanctions may have to be applied in some circumstances.

An employee can discuss any part of this policy with their Union Representative (if one exists) or their Line Manager. They can help clarify an employee's rights as well as give guidance and support where it may be needed. Every individual has the right to representation at any point during the disciplinary process.

### 2.4.2 Suspension

Suspension is not disciplinary action. The purpose of suspension is manifold and can be used when it is necessary to remove an employee from the workplace (virtual or physical) pending an investigation for example, to allow time for a 'cooling down period' for both parties, for their own or others protection, to prevent them influencing or being influenced by others or to prevent possible interference with evidence. Only the Manager in charge of that individual, at that time or their superior, has the authority to suspend an individual.

An employee suspended from duty will receive written confirmation within three days of:

- the reason for the suspension
- the date and time from which the suspension will operate.
- the timescale of the ongoing investigation.
- the right of appeal to the immediate manager of the suspending manager should the suspension last more than 7 days

### 2.4.3 Counselling

Counselling is an attempt to correct a situation and prevent it from getting worse without having to use the disciplinary procedure. Where improvement is required, the employee must be given clear guidelines as to:

- what is expected in terms of improving shortcomings in conduct or performance
- the time scales for improvement
- when this will be reviewed
- (where appropriate), that failure to improve may result in formal disciplinary action.

A record of the counselling should be given to the employee and a copy retained in their personnel file. It is imperative that any counselling should be followed up and improvements recognised and recorded. Once the counselling objectives have been met, any record of the counselling will be removed from the employees file.

If during counselling it becomes clear that the matter is more serious, then the discussion should be adjourned, and pursued under the formal disciplinary procedure.

#### 2.4.4 Procedure for Formal Investigation

1. Formal investigations should be carried out by the most appropriate manager who is not directly involved with the incident being investigated. This manager may involve others to assist with the investigation process. All the relevant facts should be gathered promptly as soon as is practicable after the incident. Statements should be taken from witnesses at the earliest opportunity. Any physical evidence should be preserved and/or photographed if reasonable to do so.
2. A report should be prepared which outlines the facts of the case. This should be submitted to the appropriate senior manager / Director who will decide whether further action is required. Where appropriate, this report may be made available to the individual and their representative.
3. In most circumstances where misconduct or serious misconduct is suspected, it will be appropriate to set up an investigatory hearing. This would be chaired by the appropriate Manager / Director, who would be accompanied by another manager. The investigating manager would be asked to present his/her findings in the presence of the employee who has been investigated. Witnesses should be called at this stage, and the employee (or their representative) allowed to question these witnesses. The employee has a right of representation at this hearing.
4. Following the full presentation of the facts, and the opportunity afforded to the employee to state his side of the case, the hearing should be adjourned, and everyone would leave the room except the senior manager / Director hearing the case, and the other manager. They would discuss the case and decide which of the following option would be appropriate:
  - take no further action against the employee
  - recommend counselling for the employee
  - proceed to a disciplinary hearing
5. All parties should be brought back, and informed as to which option has been chosen. Should the decision be taken to proceed to a disciplinary hearing the manager should inform the employee and their representative that the hearing would now become a formal disciplinary hearing, and invite them to say anything further in relation to the case.
6. It may be appropriate at this point to adjourn proceedings, whilst necessary arrangements are made for a representative to attend the hearing at the request of the employee.

7. Should anyone who is subject to disciplinary action resign during the course of it, the action will cease unless there are extenuating circumstances which require its continuance. The subject of the discipline may also request that the disciplinary action continue.

### 2.4.5 Warnings

#### **Examples of Minor Misconduct**

Below are listed examples of misconduct which may warrant either a Verbal Warning or a First Written Warning. It is stressed however that this list is not exhaustive and that on all occasions a full and proper investigation must take place prior to the issue of a warning.

- Persistent lateness and poor time-keeping.
- Absence from work, including going absent during that employee's normal working hours, without valid reason, notification or authorisation.
- Failure to work in accordance with prescribed procedures.
- Incompetence.
- Unreasonable standards of dress or personal hygiene when coming into contact with members or other executives.
- Failure to observe Company regulations and procedures.

#### **Verbal Warning**

A Verbal Warning is appropriate when it is necessary for the manager in charge to take action against an employee for any minor failing or minor misconduct.

#### **First Written Warning**

A First Written Warning is appropriate when:

- a verbal warning has not been heeded and the misconduct is either repeated or performance has not improved as previously agreed.
- an offence is of a more serious nature for which a written warning is more appropriate.
- the recurrence or accumulation of an offence/offences, if left, will lead to more severe disciplinary action.

#### **Examples of Gross – Misconduct**

Listed below are examples of misconduct which may be considered to be Gross Misconduct and may warrant a Final Warning, Demotion or Dismissal. It is stressed however that this list is not exhaustive and that on all occasions a full and proper investigation must take place prior to the issuing of a Final Warning, Demotion or Dismissal.

- Theft, including unauthorised possession of Company property.
- Breaches of confidentiality, prejudicial to the interest of Global Credit Data,



- Being unfit for duty because of the misuse/consumption of drugs or alcohol.
- Refusal to carry out a management instruction which is within the individual's capabilities and which would be seen to be in the interests of Global Credit Data.
- Breach of confidentiality / security procedures.
- Physical assault, breach of the peace or verbal abuse.
- False declaration of qualifications or professional registration.
- Failure to observe Company rules, regulations or procedures.
- Wilful damage of property at work.
- Incompetence or failure to apply sound professional judgement.

### **Final Written Warning**

A Final Written Warning is appropriate when:

- an employee's offence is of a serious nature falling just short of one justifying dismissal.
- an employee persists in the misconduct which previously warranted a lesser warning.

### **Downgrading or Transfer to another role**

This action is appropriate when:

- previous attempts, via the disciplinary procedure, to rectify a problem have failed and this is a final attempt to solve a problem without having to dismiss an employee.
- an employee is considered by the Manager of the department to be incompetent or otherwise unfit to fulfil the duties for which he is employed but where dismissal is not thought to be appropriate.

### **Dismissal**

Dismissal is appropriate when

- an employee's behaviour is considered to be Gross Misconduct.
- an employee's misconduct has persisted, exhausting all other lines of disciplinary procedure.

### **Time Scales for the expiry of Warnings**

Warnings issued to employees shall be deemed to have expired after the following periods of time, meaning that if nothing further has happened then any further process steps must be started again.

- Verbal Warnings: 6 months
- First Written Warnings: 12 months
- Final Written Warnings: 18 months (or as agreed and recorded at the hearing)

These time scales remain provided that during that period, no further warnings have been issued in respect of the employee's conduct.

#### 2.4.6 Letter of Warning

All Warnings must contain the following information

- The letter must be issued within 7 days of the date of the disciplinary hearing.
- The nature of the offence and where appropriate, that if further misconduct occurs, more severe disciplinary action will be taken.
- The period of time given to the employee for improvement.
- The employee's right to appeal to the manager directly above that of the one issuing the warning.
- A copy of the warning and any supporting documentation must be attached to the individual's personnel file.
- The employee must also receive a copy of the warning which in the case of any written warning will be sent to their home address by recorded delivery if not handed to them in person.
- In the case of a final written warning, reference must be made to the fact that any further misconduct will lead to dismissal, and that the employee has the right of appeal, and to who they can make that appeal.

The letter confirming dismissal will contain the following information:

- The reason for dismissal and any administrative matter arising from the termination of their employment.
- The employees right of appeal and to whom they should make that appeal

#### 2.4.7 Appeals

Every employee has the right to appeal against the outcome of a disciplinary hearing. The basis of an appeal should normally relate to one of the following areas:

- that Global Credit Data's' Procedure had not been followed correctly.
- that the resulting disciplinary action was inappropriate.
- that the need for disciplinary action was not warranted.
- that new information regarding disciplinary action has arisen

An appeal should be put in writing to the Chief Executive or the Chairman of the Board (to the Chairman of the Board if the appeal is against a ruling of the Chief Executive). The letter of appeal may be constructed by the employee or their representative. The letter should contain the grounds for appeal and should be lodged within 10 days of receipt of the warning / dismissal letter.

An appeal will be arranged within 20 working days of receipt of the appeal letter.

**Appeals against Verbal and First Warnings**

In the case of verbal and first warnings, the appeal will be heard by the manager next in line to the one who issued the warning.

**Appeals against Downgrading, Final Warnings and Dismissal**

The hearing and determining of appeals against final warnings and dismissal will be heard by the appropriate Director or Chief Executive. They may also involve another senior manager / Director not previously involved with the case.

When dealing with an appeal against a Final Warning or Dismissal written statements of case may be submitted no later than 2 days prior to the date of Appeal Hearing. No additional written evidence will be admitted by the Appeal Committee on the date of the Hearing.

Witnesses may be required by either party at an appeal hearing, dependent upon the circumstances and nature of the case. However, there is no specific obligation on either party to produce a witness. Either party must give 5 days prior notice that they intend to call specific persons involved or associated with the case under consideration.

It is the responsibility of the management representative and for the appellant to each arrange for the availability and attendance of any witness they wish to call.

**SECTION 3 - DEALING WITH EMPLOYEE CONCERNS: *Hearing Grievances, Dealing with Bullying & Harassment, and making provisions for “Whistleblowing”***

## 3.1 Grievance Procedure

The grievance procedure is intended as the tool by which an employee may formally have a grievance, regarding any condition of their employment, heard by the management of Global Credit Data. The aggrieved employee has the right to representation by a Trade Union Representative (if such exists) or a work colleague

In the event of an employee wishing to raise a grievance, it is preferable for the grievance to be satisfactorily resolved as close to the individual and their line manager as possible. It is understood however that this is not always possible and that a formal procedure is required to ensure the swift and fair resolution of matters which aggrieve Global Credit Data's employees.

Time scales have been fixed to ensure that grievances are dealt with quickly, however these may be extended if it is agreed upon by both parties.

“The grievance procedure is intended as the tool by which a member of staff may formally have a grievance, regarding any condition of their employment, heard by management.”

This procedure is not intended to deal with:

1. Dismissal or disciplinary matters which are dealt with in a separate procedure.
2. Disputes which are of a collective nature and which are dealt with in a separate procedure.

### 3.1.1 Stage 1

An employee who has a grievance, should raise the matter with his line manager / supervisor immediately either verbally or in writing. If the matter itself concerns the employee's immediate manager, then the grievance should be taken to their superior.

If the manager is unable to resolve the matter at that time, then a formal written grievance form should be submitted (see appendix 1). The manager should then respond within **2 working days** (i.e. the manager's normal working days) to the grievance unless an extended period of time is agreed upon by both parties. The response will give a full written explanation of the managers decision and who to appeal to if still aggrieved.

### 3.1.2 Stage 2

In most instances Global Credit Data would expect the managers' decision to be final and for the matter to come to a close. However, in some circumstances the employee may remain aggrieved and can appeal against the decision of the manager concerned.

The appeal, to the manager next in line, must be made within ten working days of the original response to the employee's grievance. The appeal must be in writing (see appendix 2) and contain the original formal Grievance form. This manager will attempt to resolve the

grievance. A formal response and full explanation will be given in writing, as will the name of the person to whom they can appeal if still aggrieved, **within 7 days**.

Where the 'next in line' manager at this stage is the Director with responsibility for the employee's function, then the grievance should immediately progress to stage 3.

### 3.1.3 Stage 3

If the employee remains aggrieved there will be a final level of appeal to the Director responsible for the employees function. This appeal must be made in writing (see appendix 3), enclosing a copy of the original Formal Grievance form, to the Director within ten working days of receipt of the Stage 2 response. This Director will arrange and hear the appeal with another management representative and respond formally with a full explanation **within 20 working days**.

Where a grievance is raised against a Director then the grievance will be heard by the Chief Executive.

There is no further right of appeal. Where however **both** parties agree that there would be some merit in referring the matter to a board member or a third party for advice, conciliation or arbitration, arrangements will then be made to find a mutually acceptable third party.

### 3.1.4 Using mediation

An independent third party or mediator can sometimes help resolve grievance issues before it is necessary to invoke the formal procedure. Mediation is a voluntary process where the mediator helps two or more people in dispute to attempt to reach an agreement. Any agreement comes from those in dispute, not from the mediator. The mediator is not there to judge, to say one person is right and the other wrong, or to tell those involved in the mediation what they should do. The mediator is in charge of the process of seeking to resolve the problem but not the outcome.

There are no hard-and-fast rules for when mediation is appropriate but it can be used:

- for conflict involving colleagues of a similar job or grade, or between a line manager and their staff
- at any stage in the conflict as long as any ongoing formal procedures are put in abeyance
- to rebuild relationships after a formal dispute has been resolved
- to address a range of issues, including relationship breakdown, personality clashes, communication problems and bullying and harassment.

Mediation is not part of Global Credit Data's formal grievance procedure. However if both parties agree to mediation, then the grievance procedure can be suspended in an attempt to resolve the grievance through that route. If mediation is not successful, then the grievance procedure can be re-commenced.

### 3.1.5 Appendices

#### **Appendix 1**

*To:*

*From:*

*Dept:*

*Date:*

*Immediate Superior:*

Dear

I wish to take a formal grievance out against:

---

in line with Global Credit Data Grievance Procedure. The details of my grievance are shown below:

Yours sincerely,

***(Manager should respond to this formal written grievance within 2 working days unless an extended period for response is mutually agreed)***

## Appendix 2

*To:*

*From:*

*Dept:*

*Date:*

*Immediate Superior:*

Dear

On (within 10 days of the response to the initial formal grievance) my grievance against was heard by

I am not satisfied with the outcome of this meeting and would like to appeal to yourself for a further hearing of my grievance, in line with Global Credit Data Grievance Procedure.

I enclose a copy of the original letter regarding this matter and other correspondence and information related to it.

Yours sincerely

***(Manager should respond to this formal written grievance within 7 days unless an extended period for response is mutually agreed)***



**Appendix 3**

*To (Director):*

*From:*

*Dept:*

*Date:*

*Immediate Superior:*

Dear

On (within 10 days of the response to the second stage of the formal grievance) I appealed against the decision made at my initial grievance against

---

I remain dissatisfied with the outcome of this meeting and would like to appeal to you for a further hearing of my grievance, in line with Global Credit Data Grievance Procedure.

I enclose a copy of the original letter regarding this matter and other correspondence and information related to it.

Yours sincerely

***(Director should respond to this formal written grievance within 20 working days unless an extended period for response is mutually agreed)***

## 3.2 Prevention of Bullying and Harassment at Work

### 3.2.1 Statement of Policy

3.2.1.1 Global Credit Data is committed to encouraging and maintaining good employee relations within a working environment which fosters team working and encourages employees to give their best work. Everyone in Global Credit Data and those who have dealings with Global Credit Data have a responsibility to maintain good working relationships and not use words or deeds that may harm the wellbeing of others. In addition to the obligations placed upon both employers and employees by the Equality and Human Rights legislation, everyone has the right to be treated with consideration, fairness, dignity and respect. This contributes to a workplace environment in which individuals feel safe and can work effectively competently and confidently.

Global Credit Data believes that the working environment should at all times be supportive of the dignity and respect of individuals. If a complaint of harassment is brought to the attention of management, it will be investigated promptly and appropriate action will be taken.

3.2.1.2 Global Credit Data's policy applies to all staff working within the organisation and to all employees working off the premises. It extends to include non-permanent workers such as secondees, contractors, agencies, temporary staff, consultants and any other workers. The policy, in addition, covers the behaviour of staff outside working hours which may impact upon work or working relationships.

3.2.1.3 Global Credit Data has a "zero tolerance" policy and will investigate vigorously any allegations of bullying or harassment, regardless of whether the matter has been raised formally or informally.

### 3.2.2 Key Principles

3.2.2.1 Global Credit Data will provide and sustain a safe working environment in which everyone is treated fairly and with respect. Those working or dealing with Global Credit Data must not encounter harassment, intimidation or victimisation on the basis of gender, race, colour, ethnic or national origin, sexual orientation, marital status, religion or belief, age, trade union membership, disability, offending background or any other personal characteristic.

3.2.2.2 Everyone carries a personal responsibility for their own behaviour and for ensuring that their conduct is in accordance with the principles set out in this policy. In addition, each person has a responsibility to report any instance of bullying or harassment which they witness or which comes to their attention. Employees have a responsibility to act as role models, pro-actively addressing instances of bullying and harassment. Managers should also make themselves aware of their responsibility.

3.2.2.3 Harassment may be defined as any conduct which is :-

- unwanted by the recipient
- is considered objectionable
- causes humiliation, offence, distress or other detrimental effect.

3.2.2.4 Harassment may be an isolated occurrence or repetitive: it may occur against one or more individuals. Harassment may be, but is not limited to:

- Physical contact – ranging from touching to serious assault, gestures, intimidation, aggressive behaviour.
- Verbal – unwelcome remarks, suggestions and propositions, malicious gossip, jokes and banter, offensive language.
- Non-verbal – offensive literature or pictures, graffiti and computer imagery, isolation or non-co-operation and exclusion or isolation from social activities.

3.2.2.5 Bullying is unlikely to be a single or isolated instance. It is usually, but not exclusively repeated and persistent behaviour which is offensive, abusive, intimidating, malicious or insulting. Bullying includes but is not limited to:

- Conduct which is intimidating, physically abusive or threatening
- Conduct that denigrates, ridicules or humiliates an individual, especially in front of colleagues
- Humiliating an individual in front of colleagues
- Picking on one person when there is a common problem
- Shouting at an individual to get things done
- Consistently undermining someone and their ability to do the job
- Setting unrealistic targets or excessive workloads
- “cyber-bullying” i.e. bullying via e-mail. (This is especially relevant for GCD where most employees are working remotely and are managed by e-mail. Care and sensitivity should be practised with regard to the choice of context and language).
- Setting an individual up to fail e.g. by giving inadequate instructions or unreasonable deadlines.

***Harassment and Bullying may be summarised as any behaviour that is unwanted by the person to whom it is directed. It is the impact of the behaviour rather than the intent of the perpetrator that is the determinant as to whether harassment or bullying has occurred.***

3.2.2.6 Any employee who wishes to make a complaint of harassment or bullying is encouraged to first discuss matters informally with their line manager, provided that they feel able to do so. Should the issues not be resolved at this stage, or the employee feels unable to raise the issue informally, then a formal resolution should be sought.

- 3.2.2.7 When a complaint of Harassment or Bullying is brought to the attention of a manager at any level, whether informally or formally, prompt action must be taken to investigate the matter. Corrective action must be taken where appropriate and this may require an investigation under Global Credit Data's Disciplinary Policy and Procedure.
- 3.2.2.8 All matters relating to the investigation of complaints of harassment or bullying will be treated in strict confidence. Any breach of confidentiality in this regard may render those responsible liable to disciplinary actions. However, it will be necessary that any alleged perpetrator is made aware of the allegations against them and the name(s) of those making the allegations together with the name(s) of any witnesses.
- 3.2.2.9 No employee will be victimised or suffer detriment for making a complaint of harassment or bullying and no manager shall threaten either explicitly or implicitly that an employee's complaint will be used as the basis for decisions affecting that employee. Such conduct will be treated as a very serious disciplinary offence. Similarly, managers are required to act on any complaint of harassment or bullying. Failure to do so will be regarded as misconduct which if proven, will result in disciplinary action.

All complaints of harassment or bullying whether raised formally or informally must be notified by the recipient of the complaint to the Chief Executive. This legislation requires such records to be maintained and the incidence of bullying and harassment to be monitored.

### 3.2.3 Procedure

#### 3.2.3.1 Informal Resolution

- 3.2.3.1.1 Very often people are not aware that their behaviour is unwelcome or misunderstood and an informal discussion can lead to greater understanding and agreement that the behaviour will cease.
- 3.2.3.1.2 Complainants are therefore encouraged to try, if they feel able to do so, to resolve the problem informally by making it clear to the alleged harasser that his/her actions are unwanted and should not be repeated. This may be done verbally or in writing in which case the complainant should keep a copy of the documentation and, where possible, the times and dates of incidents should be recorded.
- 3.2.3.1.3 If the complainant feels unable to approach the alleged harasser, a work colleague, or Trade Union representative could be asked to speak to the alleged harasser on the complainant's behalf. A note should be made of the action taken and the matter notified to the Chief Executive.

- 3.2.3.1.4 An individual who is made aware that their behaviour is unacceptable should:-
- Listen carefully to the complaints and the particular concerns raised;
  - Respect the other person's point of view: everyone has a right to work in an environment free from harassment/intimidation;
  - Understand and acknowledge that it is the other person's reaction/perception to another's behaviour that is important;
  - Agree the aspects of behaviour that will change;
  - Review their general conduct/behaviour at work and with workplace colleagues.

### **3.2.3.2 Formal Resolution**

- 3.2.3.2.1 If the alleged harassment continues, the complainant feels unable or unwilling to deal with the matter informally, or the allegation is so serious as to prevent use of the informal procedure, a complaint should then be raised formally with the employer.
- 3.2.3.2.2 Normally, the employer's representative will be the employee's line manager. However, if the employee feels unable to do this they should submit the complaint in writing to a more senior manager within their Department. In exceptional circumstances, allegations may be raised directly with the relevant Director, who will with other appropriate senior managers, arrange for the matter to be progressed in accordance with this policy and procedure.
- 3.2.3.2.3 When dealing with a complaint of harassment under the Formal Resolution Procedure, the relevant manager should:
- a) Take full details of the incidents in writing from the complainant and their representative (if appropriate);
  - b) Take full details from any witnesses/other complainants who come forward and may have witnessed the alleged behaviour
  - c) Inform the alleged harasser of the complaints against him/her, advise the alleged harasser to seek representation and invite him/her to a meeting in order for them to comment on the allegations against them.
  - d) Keep all parties informed of expected timescales.
  - e) Inform all parties in writing of the outcome and any action that may be required.
- 3.2.3.2.4 If the allegations and the working situation warrant it, the alleged harasser may be suspended during the investigation (in accordance with established disciplinary procedure) or transferred temporarily pending the outcome of the inquiry to another Department.

3.2.3.2.5 Should there be a case to answer against the alleged harasser, the manager who has dealt with the complaint will communicate this to an impartial manager who will conduct a separate disciplinary investigation. The normal disciplinary procedure for misconduct/gross misconduct should then be followed. However, the following points should be taken into account:-

- The complainant will normally be required to attend the disciplinary hearing as a witness, unless there are exceptional circumstances which prevent them from doing so;
- If the complainant is required to attend, they are entitled to be accompanied by either a Trade Union representative or work colleague and have any questions directed through that person.

3.2.3.2.6 If the complaint is upheld at the disciplinary stage, there are a number of possible outcomes for the harasser, depending on the evidence presented and the circumstances. These could include, but are not limited to:-

- Dismissal
- A formal warning
- A recommendation of redeployment of the harasser, either on a temporary or a permanent basis. This will not be on any less favourable terms and conditions of employment.
- Implementation of other sanctions as detailed in Global Credit Data's Disciplinary Policy.
- Making arrangements for both parties to work as separately as possible within the same workplace.

3.2.3.2.7 In addition to the above, the harasser may be required to attend any training courses as deemed necessary by Global Credit Data.

3.2.3.2.8 It should also be noted that the complainant may wish to move Department depending upon the nature of the complaint and the people involved. Appropriate consideration should be given to this request and the outcome with reasons provided to the complainant.

3.2.3.2.9 With any allegation, the need for a thorough and objective investigation is paramount. Consequently, if through the course of the investigation evidence demonstrates that the allegation has been made frivolously, maliciously, or for personal gain, then the individual making the complaint will be subject to Disciplinary proceedings as outlined in Global Credit Data's Disciplinary Policy.

### **3.2.3.3 Appeals**

Appeals against decisions taken under the Bullying and Harassment at Work Policy and Procedure shall be dealt with as follows:-

- Appeals against a disciplinary sanction will be dealt with in accordance with the appeals process in the Disciplinary Procedure.
- Appeals by a complainant about the outcome of any inquiry will be dealt with in accordance with the appeal process in the Grievance Policy.

### **3.2.3.4 Records**

Where the complaint is informal and resolved at this stage, no record will be kept on personnel files.

Following formal investigation, where the complaint is not substantiated, no records will be retained.

Where a complaint is substantiated or partially substantiated but does not proceed to disciplinary, a letter confirming the outcome will be retained on the personnel file and supporting documentation retained in a separate file for a period of 12 months.

Where the matter proceeds to a disciplinary hearing then the storage of records should be in accordance with the disciplinary procedure.

### 3.3 "Whistleblowing" Policy

(Making a Disclosure in the Public Interest)

#### 3.3.1 Introduction

Global Credit Data is committed to the highest standards of openness, probity and accountability.

An important aspect of accountability and transparency is a mechanism to enable staff and other members of Global Credit Data to voice concerns in a responsible and effective manner. It is a fundamental term of every contract of employment that an employee will faithfully serve his or her employer and not disclose confidential information about the employer's affairs. Nevertheless, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organisation then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of line management (although in relatively minor instances the line manager would be the appropriate person to be told).

"...this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by Global Credit Data..."

Depending on country of residence or employment there may exist legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. Global Credit Data has endorsed the provisions set out below so as to ensure that no members of staff should feel at a disadvantage in raising legitimate concerns.

It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by Global Credit Data nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures. Once the "whistleblowing" procedures are in place, it is reasonable to expect staff to use them rather than air their complaints outside Global Credit Data.

#### 3.3.2 Scope of Policy

This policy is designed to enable employees of Global Credit Data to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety. This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary. These concerns could include

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or Statutes
- Dangers to Health & Safety or the environment
- Criminal activity



- Improper conduct or unethical behaviour
- Attempts to conceal any of these

To be clear, this policy does not cover any concerns or suspicions of malpractice at our member organisations, which might arise as a result of GCD executives finding such indications in the data or other information submitted by the member. Should such a situation arise, then the executive shall notify their usual contacts at the member in question and shall deal with the data and the member in accordance with the data quality rules laid down in the Data Pool Regulations. GCD is not in a position to audit a member or form a view about suspected malpractice at a member organisation.

### 3.3.3 Safeguards

#### i. Protection

This policy is designed to offer protection to those employees of Global Credit Data who disclose such concerns provided the disclosure is made:

- in good faith
- in the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person (see below). It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case malicious or wild allegations could give rise to legal action on the part of the persons complained about.

#### ii. Confidentiality

Global Credit Data will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

#### iii. Anonymous Allegations

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of Global Credit Data.

In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources

#### iv. Untrue Allegations

If an individual makes an allegation in good faith, which is not confirmed by

subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

### 3.3.4 Procedures for Making a Disclosure

On receipt of a complaint of malpractice, the employee who receives and takes note of the complaint, must pass the complaint on as soon as is reasonably possible, to the appropriate designated investigating officer as follows:

- Complaints of malpractice will be investigated by the Chief Executive unless the complaint is against the Chief Executive or is in any way related to the actions of the Chief Executive. In such cases, the complaint should be passed to a Board member or the Chairman of the Board.
- The complainant has the right to bypass the line management structure and take their complaint direct to the Chairman. The Chairman has the right to refer the complaint back to management if he/she feels that the management without any conflict of interest can more appropriately investigate the complaint.

If there is evidence of criminal activity then the investigating officer should inform the police. Global Credit Data will ensure that any internal investigation does not hinder a formal police investigation.

### 3.3.5 Timescales

Due to the varied nature of these sorts of complaints, which may involve internal investigators and / or the police, it is not possible to lay down precise timescales for such investigations. The investigating officer should ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations.

The investigating officer, should as soon as practically possible, send a written acknowledgement of the concern to the complainant and thereafter report back to them in writing the outcome of the investigation and on the action that is proposed. If the investigation is a prolonged one, the investigating officer should keep the complainant informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded.

All responses to the complainant should be in writing or email and sent to their home address or home email address.

### 3.3.6 Investigating Procedure

The investigating officer should follow these steps:

- Full details and clarifications of the complaint should be obtained.
- The investigating officer should inform the employee against whom the complaint is made as soon as is practically possible. The employee will be informed of their right to be accompanied by a trade union or other representative at any future interview or hearing held under the provision of these procedures.
- The investigating officer should consider the involvement of Global Credit Data auditors and the Police at this stage and should consult with the Chairman / Chief Executive
- The allegations should be fully investigated by the investigating officer with the assistance where appropriate, of other individuals / bodies.
- A judgement concerning the complaint and validity of the complaint will be made by the investigating officer. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement. The report will be passed to the Chief Executive or Chairman as appropriate.
- The Chief Executive / Chairman will decide what action to take. If the complaint is shown to be justified, then they will invoke the disciplinary or other appropriate Company procedures.
- The complainant should be kept informed of the progress of the investigations and, if appropriate, of the final outcome.
- If appropriate, a copy of the outcomes will be passed to Global Credit Data Auditors to enable a review of the procedures.

If the complainant is not satisfied that their concern is being properly dealt with by the investigating officer, they have the right to raise it in confidence with the Chief Executive / Chairman, or one of the designated persons described above.

If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcome of the investigation, Global Credit Data recognises the lawful rights of employees and ex-employees to make disclosures, where justified, elsewhere.

**SECTION 4 – SUPPORTING OUR STAFF IN THE WORKPLACE: *By ensuring Equality and Fairness in all aspects of Employment; dealing with Alcohol and Drug issues, and ensuring their Health & Safety is properly guarded.***

## 4.1 Equality Policy

### 4.1.1 Policy Statement

4.1.1.1 Global Credit Data recognises that discrimination and victimisation is unacceptable and that it is in the interests of Global Credit Data and its employees to utilise the skills of the total workforce. It is the aim of Global Credit Data to ensure that no employee or job applicant receives less favourable facilities or treatment (either directly or indirectly) in recruitment or employment on grounds of age, disability, gender / gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion or belief, sex, or sexual orientation (the **protected characteristics**).

“Our aim is that our employees will be representative of all sections of society and each employee feels respected and able to give of their best.”

4.1.1.2 The small size of GCD’s executive team, our need for specialised skills and our global reach must be taken into account when implementing this equality policy.

4.1.1.3 Our aim is that as far as reasonably possible our employees will be representative of all sections of society and for each employee to feel respected and able to give their best.

4.1.1.4 We oppose all forms of unlawful and unfair discrimination or victimisation. To that end the purpose of this policy is to provide equality and fairness for all in our employment.

4.1.1.5 All employees, whether part-time, full-time or temporary, will be treated fairly and with respect. Selection for employment, promotion, training or any other benefit will be on the basis of experience, aptitude and ability. All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the organisation.

4.1.1.6 Our staff will not discriminate directly or indirectly, or harass members or suppliers because of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation in the provision of Global Credit Data’s goods and services.

### 4.1.2 Our Commitment

- To create an environment in which individual differences and the contributions of all our staff are recognised and valued.
- Every employee is entitled to a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.
- Training, development and progression opportunities are available to all staff.
- To promote equality in the workplace which we believe is good management practice and makes sound business sense.

- We will review all our employment practices and procedures to ensure fairness.

### 4.1.3 Responsibilities of Management

4.1.3.1 Responsibility for ensuring the effective implementation and operation of the arrangements will rest with the Chief Executive. Directors / Managers will ensure that they and their staff operate within this policy and arrangements, and that all reasonable and practical steps are taken to avoid discrimination. Each manager will ensure that:

- all their staff are aware of the policy and the arrangements, and the reasons for the policy;
- grievances concerning discrimination are dealt with properly, fairly and as quickly as possible;
- proper records are maintained.

The Chief Executive will be responsible for monitoring the operation of the policy in respect of employees and job applicants.

### 4.1.4 Responsibilities of Staff

4.1.4.1 Responsibility for ensuring that there is no unlawful discrimination rests with all staff and the attitudes of staff are crucial to the successful operation of fair employment practices. In particular, all members of staff should:

- comply with the policy and arrangements;
- not discriminate in their day to day activities or induce others to do so;
- not victimise, harass or intimidate other staff or groups who have, or are perceived to have one of the protected characteristics.
- ensure no individual is discriminated against or harassed because of their association with another individual who has a protected characteristic.
- inform their manager if they become aware of any discriminatory practice.

### 4.1.5 Third Parties

Third-party harassment occurs where a Company employee is harassed, and the harassment is related to a protected characteristic, by third parties such as suppliers or members. Global Credit Data will not tolerate such actions against its staff, and the employee concerned should inform their manager / supervisor at once that this has occurred. Global Credit Data will fully investigate and take all reasonable steps to ensure such harassment does not happen again.

### 4.1.6 Related Policies and Arrangements

All employment policies and arrangements have a bearing on equality of opportunity. Global Credit Data policies will be reviewed regularly and any discriminatory elements removed.

#### 4.1.7 Rights of Disabled People

Under the terms of this policy, managers are required to:

- make reasonable adjustment to maintain the services of an employee who becomes disabled, for example, training, provision of special equipment, reduced working hours. (NB: managers are expected to seek advice on the availability of advice and guidance from external agencies to maintain disabled people in employment);
- include disabled people in training/development programmes;
- give full and proper consideration to disabled people who apply for jobs, having regard to making reasonable adjustments for their particular aptitudes and abilities to allow them to be able to do the job.

#### 4.1.8 Grievances/Discipline

Employees have a right to pursue a complaint concerning discrimination or victimisation via the Global Credit Data Grievance or Harassment Procedures.

Discrimination and victimisation will be treated as disciplinary offences and they will be dealt with under the Global Credit Data Disciplinary Procedure.

#### 4.1.9 Review

The effectiveness of this policy and associated arrangements will be reviewed annually under the direct supervision of Global Credit Data's Chief Executive.

## 4.2 Drug, gambling and Alcohol Abuse Policy

### 4.2.1 Introduction

4.2.1.1 Global Credit Data recognises that alcohol, gambling and drug abuse related problems are an area of health and social concern. It also recognises that an employee with such problems needs help and support from his / her employer.

4.2.1.2 Global Credit Data also recognises that alcohol, gambling and drug abuse problems can have a detrimental effect on work performance and behaviour. Global Credit Data has a responsibility to its employees and members to ensure that this risk is minimised.

“Global Credit Data recognises that gambling, alcohol and drug abuse problems can have a detrimental effect on work performance and behaviour as well as increasing the risks of fraud and operational errors. Global Credit Data has a responsibility to its employees and members to ensure that this risk is minimised.”

4.2.1.3 Accordingly, Company policy involves two approaches

- Providing reasonable assistance to the employee with an alcohol, gambling or drug abuse problem who is willing to co-operate in treatment for that problem.
- Disciplinary rules, enforced through disciplinary procedures, where use of alcohol or drugs (other than on prescription) affects performance or behaviour at work, and where either (1) an alcohol or drug dependency problem does not exist or (2) where treatment is not possible or has not succeeded. Gambling addiction is a serious risk factor in financial crime and fraud and GCD may need to use disciplinary rules immediately in this circumstance.

4.2.1.4 Global Credit Data does not have the internal resources to provide or arrange treatment or other forms of specialist assistance. Such services are provided by GPs, hospitals and other agencies. Through this policy Global Credit Data will seek both to assist an employee in obtaining such specialist help, and to protect his/her employment.

### 4.2.2 Assistance for an employee

4.2.2.1 Global Credit Data will, where possible, provide the following assistance to an employee:

- Helping the employee to recognise the nature of the problem, through referral to a qualified diagnostic or counselling service.
- Support during a period of treatment. This may include a period of sick leave or approved other leave, continuation in post or transfer to other work, depending upon what is appropriate in terms of the staff member's condition and needs of Global Credit Data.



- The opportunity to remain or return to work following the completion of a course of treatment, as far as is practicable, in either the employee's own post or an alternative post.

4.2.2.2 Global Credit Data's assistance will depend upon the following conditions being met:

- An Approved Doctor diagnoses an alcohol, gambling or drug dependency related problem.
- The employee recognises that he/she is suffering from an alcohol, gambling or drug abuse problem and is prepared to co-operate fully in referral and treatment from appropriate sources.

4.2.2.3 Global Credit Data and its employees must recognise the following limits to the assistance Global Credit Data can provide:

- Where an employee fails to co-operate in referral or treatment arrangements, no special assistance will be given and any failure in work performance and behaviour will be dealt with through the Disciplinary Procedure.
- If the process of referral and treatment is completed but is not successful, and failure in work performance or behaviour occurs, these will be dealt with through the Disciplinary Procedure.
- An employee's continuation in his/her post or an alternative post during or after treatment will depend upon the needs of and risk to Global Credit Data at that time.

### 4.2.3 Disciplinary Action

4.2.3.1 In line with Global Credit Data's disciplinary rules, the following will be regarded as serious misconduct:

- a) Performing work and/or carrying out duties under the influence of alcohol or drugs.
- b) Absence from work or poor performance due to distraction of gambling addiction

Breach of these rules will normally result in summary dismissal, and only in exceptional cases will either notice or the reduced disciplinary action of a final written warning be applied.

4.2.3.2 Where a breach of these rules occurs, but it is established that an alcohol, gambling or drug abuse related problem exists, and the employee is willing to co-operate in referral to an appropriate service and subsequent treatment, Global Credit Data will suspend application of the Disciplinary Procedure and provide assistance as described above. Staff who do not comply with the treatment suggested or continue to abuse alcohol or drugs will be subjected to the application of the Disciplinary Policy.

#### 4.2.4 Procedures

4.2.4.1 The procedures define management responsibilities and provide guidelines on:

- a) Where assistance to an employee should be provided and the nature of and limits to such assistance.
- b) The application of Global Credit Data's Disciplinary Procedure.

4.2.4.2 Alcohol, gambling or drug abuse related problems can come to the notice of management through:

- a) Failures in work performance or behaviour necessitating use of the Disciplinary Procedure. In such situations the procedure described above should be followed.
- b) Other means, where an employee seeks or agrees to accept assistance on a voluntary basis. In such situations, the procedures described above should be followed.

#### 4.2.5 Recognition of the existence of a possible alcohol, gambling or drug abuse problem.

4.2.5.1 Abuse of alcohol or drugs or fixation on gambling can affect performance and behaviour at work, i.e., either through serious misconduct at work, (where there is a direct and demonstrable breach of the disciplinary rules regarding alcohol, gambling or drug abuse at work), or where there is a falling off of standards of work performance or behaviour, and abuse of alcohol, gambling or drugs is a possible cause.

4.2.5.2 The immediate line manager will be responsible for responding to such situations, carrying out either counselling or disciplinary investigations and interviews, supported as appropriate by a more senior Manager.

4.2.5.3 In such interviews the possible existence of an alcohol, gambling or drug abuse problem should be explored. The line manager is not required to diagnose the existence of an alcohol, gambling or drug abuse problem, merely to assess whether such abuse is a possible factor.

4.2.5.4 Any requirements of the Disciplinary Procedure regarding allowing the employee representation will be observed.

#### 4.2.6 Diagnosing the existence of an alcohol or drug abuse problem.

4.2.6.1 Should the interviews lead to the conclusion that an alcohol, gambling or drug abuse problem might exist and the employee accepts referral, the manager should refer the matter to an appropriate Doctor, who will be responsible for establishing whether or not a diagnosis of alcoholism, gambling addiction or drug dependence can be made.

4.2.6.2 Disciplinary action should be suspended until diagnostic advice is obtained. Where appropriate, suspension arrangements in the Disciplinary Procedure should be followed.

4.2.6.3 If the interview fails to lead to the conclusion that an alcohol, gambling or drug abuse problem exists, or the employee rejects, or fails to co-operate in referral, disciplinary action should be continued, where and as the situation justifies.

#### 4.2.7 Confirmation that a problem exists and treatment arrangements.

4.2.7.1 If a positive diagnosis of an alcohol, gambling or drug abuse problem is made, and the employee agrees to co-operate in treatment, treatment arrangements should commence.

4.2.7.2 Where necessary, the Approved Doctor will advise the employee regarding treatment and will be responsible for monitoring progress with treatment and advising the manager concerned. This advice should be available at least monthly following commencement of treatment and thereafter as appropriate. (Disciplinary action should be discontinued unless the employee fails to co-operate on the treatment arranged.) Should a diagnosis of alcoholism, gambling addiction or drug dependence not be confirmed or should the employee refuse to co-operate in treatment, disciplinary action should be continued.

4.2.7.3 The Approved Doctor will advise on whether a situation has been reached where there is a lack of progress with treatment or lack of co-operation by the employee. Managers must review the facts and consider whether or not there needs to be a return to the use of Disciplinary Procedures.

4.2.7.4 Where medical certificates are submitted, sick leave should be given. Should the employee continue to be fit for work during the period of treatment, he/she should be permitted to continue in his/her post or alternative work unless such an arrangement would have an adverse effect on Company services. In such circumstances, annual or unpaid leave should be approved or, exceptionally, suspension arranged.

4.2.7.5 If an employee has been off work during the period of treatment, before returning to duty, he/she will be seen by the Occupational Health Service / Company Approved Doctor who will advise management regarding capability for continuation in his/her own post and whether any special supervision or other arrangements are required.

4.2.7.6 The employee must make every effort to comply with the advice provided by the Approved Doctor. If it is not reasonably practicable to do so, and as a result, the employee is not able to resume duty, employment may be terminated on the grounds of incapacity (ill health).

4.2.7.7 If an employee is again involved in disciplinary situations resulting from alcohol, gambling or drug abuse related problems, a second referral to an Approved Doctor

and suspension of the disciplinary procedure may be appropriate. If they advise positively on the possibilities of further treatment or help and the willingness of the employee to co-operate, the disciplinary procedure may be suspended again to permit treatment and help to be undertaken. This second referral will not apply if the further disciplinary problems involve serious misconduct. Third and subsequent referrals are not permissible.

#### 4.2.8 Situations where a Disciplinary Situation does not exist

4.2.8.1 There may be situations where the possible existence of alcohol, gambling or drug abuse problems affecting an employee comes to a manager's attention, although there is, or has been, no discernible effect on work performance or behaviour. This could arise if an employee confides in his/her manager about an alcohol, gambling or drug abuse problem, or a manager could see a need to approach an employee after observing possible "indicators" of an alcohol, gambling or drug abuse problem (i.e.) an absence pattern, information provided by the employee's colleagues, etc.

4.2.8.2 In such situations, Global Credit Data would wish staff to feel they could seek help from their employer (in complete confidence) without worry that their job security would be in jeopardy. Accordingly, if managers should be faced with a situation of this type they should:

- a) seek the advice of an Approved Doctor regarding whether and how the matter could be dealt with;
- b) counsel the employee and, if appropriate, arrange for the employee to be interviewed by an Approved Doctor.
- c) as in the procedure described above, the Approved Doctor will play a facilitating role (i.e.) seeking to establish whether a problem exists, advising and directing the employee towards appropriate forms of treatment and help.

4.2.8.3 These steps cannot be taken without the co-operation of the employee. If the employee does not wish to co-operate, no further action should be taken.

4.2.8.4 Should an employee take up the opportunity of assistance on this voluntary basis there need be no further formal involvement of management in terms of action or the right to learn of progress with treatment. It may be however that the employee would wish, or agree to, further involvement of management as a means of assisting progress with treatment.

4.2.8.5 Use of the disciplinary procedures and/or the application of the approach described above would only be appropriate if subsequently, the employee is involved in a breach of disciplinary rules.

4.2.8.6 Should the problems of the employee develop to an extent that his/her continuation in their post or employment became impossible, it may be necessary to identify alternative work or arrange for termination, on the same basis as Global Credit Data operates for staff with problems of incapacity due to ill health.

## 4.3 Health and Safety Policy

### 4.3.1 Statement of General Policy

As GCD executives normally work from their own premises, they are encouraged to ensure that they work in a healthy and safe environment. Executives are encouraged to request any support they need to make their work environment healthy

Managers are encouraged to review employees' work environments to ensure that they are conducive to good health and to also consider the workload and personal circumstances of the employee when allocating tasks and setting deadlines.

### 4.3.2 Sick Leave

Employees are encouraged to take reasonable time to rest and recover when sick and shall report all sick leave in accordance with their individual employment contract and in accordance with the Controlling Absence Policy