

NORTHERN VISIONS CODE OF CONDUCT

The Code of Conduct is intended to demonstrate Northern Visions' commitment to ethical business conduct, to comply with all relevant laws and regulations and to demonstrate that such conduct is a fundamental part of our values and culture.

Conflict of Interest

Employees & Board members should actively avoid any obvious or implicit conflict between their personal interests and those of Northern Visions and any conflict or potential conflict of interest must immediately be disclosed to the Chairperson for their approval.

Examples of conflict of interest situations could be:

- Placing a contract on behalf of Northern Visions with a supplier managed by a close friend or family member;
- Works as a consultant paid or unpaid in a private capacity for a supplier or customer of Northern Visions;
- Carry on a business in one's own time of a similar nature to their work at Northern Visions
- Have a personal or financial interest in a business that has transactions or dealings with Northern Visions
- Obtain a personal financial gain or advantage (other than normal remuneration), in business transactions or dealings involving Northern Visions.

Honesty

Our stakeholders, colleagues, customers, partners, volunteers and funders expect absolute integrity from us. We must never attempt to deceive or mislead others. We should always be honest, fair and truthful in all of our dealings.

Confidential Information

Every employee, volunteer and partner has responsibility for protecting the Northern Visions' confidential information both during and after their employment/engagement.

Confidential information and trade secrets include any of our information and technology, financial, operational or strategic plans or data and any financial, commercial or technical information that

is valuable to us and has not yet been disclosed to the public and may be valuable to a third party if they had access to it.

While colleagues should be aware of and keep up to date with freely available industry information, they must not use any unethical, unlawful or improper means to obtain confidential information from any competitor, supplier, customer or other third party. This includes hiring any person with the intent of that person providing confidential knowledge of their former employer.

Gifts, entertainment and sponsorship

Colleagues and their family members should not give or accept any gift, entertainment, transportation, sponsorship, charitable donation or other benefit which might be intended or perceived as an attempt to improperly influence the business relationship between Northern Visions and any current or prospective supplier, customer or other party doing business or connected with Northern Visions.

If you are in any doubt about what you need to do you should consult the Chairperson.

Reputation

It is essential that Northern Visions maintain a reputation for impartiality, integrity and high professional standards.

Fit & Proper

Northern Visions hold licenses issued under the Broadcasting Acts and all Board members must remain, fit and proper to hold those licenses.

Board Members

Board Members are expected to avoid conduct that might bring Northern Visions into disrepute or create a perception of bias/lack of impartiality. They must ensure that their conduct accords with the Seven Principles of Public Life.

The Chair has a particular responsibility for representing:

- The views of Northern Visions externally;
- Encouraging high standards of propriety;

- Providing an assessment of the performance of individual Board Members, should they be considered for re-appointment;
- Ensuring that Northern Visions meets regularly throughout the year and that the minutes of meetings accurately record decisions taken.

Members of the Board will be expected to show complete confidentiality in respect of information or materials supplied to them.

If a Board Member wants to raise a concern about malpractice, they should in the first instance raise their concerns with the Chairperson.

The interests of Board Members and their close family members i.e. partners and dependent children must not create the impression that Northern Visions decision-making processes might be influenced by their personal circumstances.

There may be other conflicts that must be dealt with before a Board item can be discussed. Board Members should declare any direct or indirect interests or connections they may have. They should declare not only financial interests, but also those, which involve any material benefit to either party. Personal friendships, other than mere acquaintances, may constitute a connection, as may the employment of close family members.

If in doubt, Board Members are advised to declare the connection in order to give other Board Members the opportunity to determine whether it is an actual or potential interest.

Northern Visions maintains a register of Board Members' interests which is updated annually.

Donations and political activities

It is our policy not to make cash donations to political parties.

No donation must be offered or made without the prior approval of Northern Visions Board of Directors.

Compliance with laws, policies and contracts

If anyone suspects that any crime may have been committed, it must be reported to the Chairperson who will make the

determination whether Northern Visions needs to inform law enforcement authorities.

June 2020

Chairperson