

January 2026

Policy: General Code of Conduct

This code of conduct forms part of a set of business principles for establishing and articulating the corporate values, responsibilities, obligations, and ethical ambitions of The Finzean Bucket Mill Community Interest Company (CIC) and the way in which it functions.

1. Purpose
2. Introduction
3. Communication
4. Application
5. Key Principles of the Code of Conduct
 - a. Integrity
 - b. Objectivity
 - c. Accountability
 - d. Confidentiality
 - e. Gifts and Hospitality
 - f. Conduct of Directors, Staff, Contractors and Volunteers
 - g. Anti-Bribery
6. Enforcement
7. Complaints Procedure
8. Review and Amendment

1. Purpose

The purpose of this document is to provide a set of ethical principles to be followed when carrying out specified duties on behalf the CIC.

It provides guidance on how to handle situations which pose a dilemma between alternative right courses of action, or when faced with pressure to consider right and wrong.

2. Introduction

The Finzean Bucket Mill CIC is a Community Interest Company limited by guarantee (SC830053) which names the Birse Community Trust as the recipient in the 'Asset Lock Mechanism'.

The Ethical Standards in Public Life etc. (Scotland) Act 2000 ('the Act') introduced a new Code of Conduct framework for public life in Scotland. As one of the earliest statutes passed by the Scottish Parliament, the Act underlines the strong commitment to the promotion of high standards in public life by the Scottish Executive and the Parliament itself.

Although there is no legal requirement the CIC to comply with the Act, the Board of Directors has agreed to abide by the following relevant sections of the Code of Conduct. In order to achieve the following aims:

- The organisation is effective, open and accountable;
- The highest standards of integrity and stewardship are achieved; and
- Working relationships are productive and supportive.

3. Communication

The CIC Directors recognise the importance of communication for the achievement of the above aims and that successful communication is a two-way process. They will therefore strive to ensure that in communicating among themselves and with those acting on behalf of the CIC, whether by verbal, documented, or electronic communication, they will act in accordance with the following guidelines:

1. Give clear instructions
2. Be constructive, not critical
3. Let people know the bigger picture.
4. Communicate messages effectively.
5. Give people freedom and encouragement to organize their work.
6. Make expectations clear.
7. Treat people like individuals.

Equally, it is expected that others acting on behalf of the CIC, such as Project Managers, contracted workers and volunteers, will also follow these guidelines in their own communications.

4. Application

The Code applies to any person whenever they conduct approved duties on behalf of the CIC.

5. Key Principles of the Code of Conduct

a) Integrity

Personnel should conduct themselves in a manner which does not damage or undermine the reputation of the CIC, its directors or staff. Specifically, they:

- Should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their role;
- Must avoid actual impropriety and any appearance of improper behaviour;
- Should avoid accepting gifts and hospitality that might reasonably be thought to influence their judgement.

b) Objectivity

In carrying out their role, including awarding contracts, or transacting other business, personnel should ensure that decisions are made solely on merit.

In arriving at decisions in areas where they do not have appropriate expertise, personnel should seek advice from the Directors.

c) Accountability

All Personnel:

- Have a duty to comply with constitutional and legal requirements and to adhere to best practice in such a way as to preserve confidence in the CIC;
- Are accountable to the Directors for their decisions.

d) Confidentially

Personnel will ensure that sensitive information and material is handled with due care so that it remains confidential.

e) Gifts and Hospitality

Personnel should report all gifts or offers of gifts to the Chair or Acting Chair of the CIC and seek prior approval for any hospitality which might appear to go beyond the normal hospitality associated with attending meetings and other functions in their appointed capacity.

f) Conduct of Directors, Staff, Contractors and Volunteers

All Directors, Staff, Contractors and Volunteers are obligated to abide by this code of conduct.

The Directors will develop and maintain appropriate policies and procedures for the appointment of contractors and for any staff employed by the CIC.

The Directors will require that any contractors carrying out work on behalf of the CIC are familiar with and conform to, the relevant sections of CIC's Health & Safety Manual.

g) Anti-Bribery

The CIC has a zero tolerance of bribery and corruption. This policy extends to all the company's business dealings and transactions in all areas in which it and its subsidiaries and associates operate. All Directors, Staff, Contractors and Volunteers are required to comply with this policy.

6. Enforcement

The CIC will take action in all cases where someone acting on behalf of the CIC has failed to comply with this Code of Conduct.

In the case of any breaches of the Code of Conduct, the Board of Directors will decide on the appropriate course of action.

7. Complaints Procedure

All complaints received will be passed to the Board of Directors, who will acknowledge receipt as soon as possible and give a full written response within 21 days. If the complainant remains dissatisfied, they must formally reply within 3 weeks of receiving the response, giving reasons why they are not satisfied. The complaint will then be passed to the Chair of the Board of Directors who will determine whether it

warrants further investigation. On completion of any further review, the Chair of the Board of Directors, whose decision is final, will decide on the appropriate action to be taken.

If the Directors conclude that no case has been established or that the matter is outside the scope of the CIC's Code of Conduct, the CIC will take no further action.

8. Review and Amendment

The Directors will review the format and content of this Code as and when required.