

# Business Code of Conduct

Revision 1. October 2025





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## Purpose & Vision

### Purpose Statement

Our purpose is to help drive demand to visit Aberdeen and Aberdeenshire, and to support businesses to develop and to meet that demand.

### Vision Statement

Our vision is to be the leading destination organisation in Scotland increasingly recognised for growing the visitor economy through bold and dynamic initiatives.

## Values and Behaviours



C

#### Collaborative

We work in partnership, internally and externally to work towards our company vision.

- Cross team working.
- Working with industry.
- Value and listen to counsel from key



A

#### Ambitious

We are creative, forward-thinkers and passionate about what we do.

- Be curious and question the status quo.
- Feel empowered to bring ideas to the table.
- Pursue bold and dynamic ways to inspire and engage with colleagues and industry.



ONE TEAM

R

#### Responsible

We take an environmentally responsible and insights driven approach, operate inclusively and are respectful of others.

- Understand insights and customers' needs in all decision making.
- Strive to source and buy local to support wider sustainability and net zero ambitions of the region.
- Celebrate and support colleagues to create a one team approach.



E

#### Empathetic

We listen and respond to the needs of others.

- Be friendly, approachable and open to listening to colleagues and industry partners.
- Demonstrate flexibility to our colleagues and stakeholders.
- Approach challenges with a positive perspective.

# Anti-Corruption and Bribery

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.

### **Who must comply with this policy?**

This policy applies to all persons working for the Company or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

### **What is bribery?**

“Bribe” means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

“Bribery” includes offering, promising, giving, accepting or seeking a bribe.

All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with your Line Manager or the HR & Business Services Manager.

Specifically, you must not:

- give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received.
- accept any offer from a third party that you know, or suspect is made with the expectation that we will provide a business advantage for them or anyone else; or give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure..

- You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

### **Gifts and hospitality**

This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services.

A gift or hospitality will not be appropriate if it is unduly lavish or extravagant or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).

Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers) or be given in secret. Gifts must be given in our name, not your name. Promotional gifts of low value such as branded stationery may be given to or accepted from existing customers, suppliers and business partners.

### **Record-keeping**

You must declare and keep a written record of all hospitality, or gifts given or received. You must also submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure.

All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept “off-book” to facilitate or conceal improper payments.

### **How to raise a concern**

If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption, or other breach of this policy has occurred or may occur, you must your Line Manager or the HR & Business Services Manager as soon as possible.

# Corporate Social Responsibility Policy

This policy applies to Aberdeen & Aberdeenshire Tourism Company Limited – trading as VisitAberdeenshire (the Company).

It outlines the Company's Corporate and Social Responsibility stance in relation to carrying out business and helps to communicate this to all employees.

This policy is applied in conjunction with the Company's other Policy documents and Employee Handbook.

Corporate Social Responsibility (CSR) is a concept whereby an organisation recognises that its business operations and processes may have an impact on social, economic and environmental issues outside of the workplace. It also represents a commitment to ensuring and maintaining socially responsible behaviour in an organisation.

We seek to sustain a business that is successful and respected in its ethical standing by our stakeholders. These include industry partners, consumers, funding partners, suppliers and the community. We embrace the role our business plays on a day-to-day basis in contributing to a better society.

We are aware that the running of our business will, in many ways, affect our place of work, the community and the wider environment in which we operate. We believe that the way we run our business can and should make a positive difference in these areas and we aim to ensure that continued efforts are made to achieve that.

Our corporate social responsibilities are identifiable in the following areas:

### **Environment**

The Destination Aberdeen & Aberdeenshire: A Framework for Growth 2022 – 2030 states that actions should be informed by and contribute to net zero ambitions. With regard to the Company's impact upon the environment, we commit to the following:

In house, VisitAberdeenshire will:

- Aim to reduce the carbon footprint impact of our business and strive for more efficient, greener and sustainable ways of working. For example, the office is based within TECA, the most sustainable venue of its type in the UK
- Support employee health and wellbeing and aim to educate, improve and increase sustainability knowledge and awareness
- Buy local where local delivers best value for money and procure goods and services as sustainably as possible
- Support our community and engage with our local schools wherever possible to encourage sustainable growth within the next generation of the tourism and hospitality workforce

Externally, VisitAberdeenshire will:

- Promote sustainability within the tourism and hospitality sector, encourage collaboration and inspire innovation and continuous improvement
- Always look to promote sustainable experiences and travel to positively influence the actions of our visitors
- Work with our stakeholders, suppliers and the wider tourism sector to make sustainable business simple.

### **Charitable/community work**

Our Company is keen to support and become involved in community initiatives and charitable work and our staff are encouraged to take part in charitable initiatives and engage in volunteering activities.

### **Education**

We recognise the importance of education in our community and supporting individuals during this process is key to advancement. We actively encourage our employees to take up training courses, often funded by ourselves, and we offer a number of work experience placements in partnership with local initiatives.



### **Our employees**

Involvement: We keep our staff fully informed of our policies and procedures and we encourage them to share their ideas with us on both internal processes affecting them, and the way our service is provided to customers/clients. We maintain an open and honest approach to all of our communications.

### **Equal Opportunities**

We are committed to providing an environment of equal opportunities for all members of our workforce. No account of any of the protected characteristics set out in the Equality Act 2010 shall be taken to a detrimental effect in any decision involving recruitment, promotion, provision of facilities etc. Please see our Equal Opportunities and Dignity at Work Policy for more detail in this regard.

### **Business partnerships**

We will strive to engage with local suppliers and businesses where possible to meet the business' operational needs, in order to support businesses within our area and decrease our carbon footprint.

In respect of our entire CSR initiative, we expect no lesser standards from our suppliers and business partners.

### **Ongoing commitment**

We are fully committed to the principle of CSR and aim to ensure that no relevant policy decisions are made within the business, without first evaluating the potential CSR impact.



# Data Privacy Policy

VisitAberdeenshire is committed to protecting your personal data and using it responsibly. This summary outlines how we collect, use, and safeguard your information.

### **What We Collect**

We gather personal information such as your name, email, address, phone number, and preferences. This may happen when you enter competitions, sign up for newsletters, use our website features, or engage with us on social media.

### **How We Use Your Information**

Your data helps us:

- Provide requested services and information.
- Send tailored updates and marketing communications.
- Manage events, competitions, and surveys.
- Improve our website and services through analytics tools like Google Analytics and Hotjar.
- Conduct research and profiling to understand your preferences.
- Target advertising via tools like Facebook Pixel.

### **Cookies and Analytics**

We use cookies and analytics to enhance your experience and personalize content. You can manage these settings via your browser.

### **Email & Marketing**

With your consent, we send newsletters and promotions. You can unsubscribe anytime, and your data will be handled accordingly. We use Campaign Monitor to manage communications and track engagement.

### **Social Media & User-Generated Content**

Posts using hashtags like #visitABDN may be reshared in our marketing. Your interactions on platforms like Facebook and Instagram are subject to those platforms' own privacy policies.

### **Event and Business Listings**

Users submitting events or business listings provide contact info which is stored securely. This includes industry partners and contributors.

### **Third Parties & Partners**

We may share limited data with trusted partners (e.g., VisitScotland, P&J Live) for legitimate interests or campaign delivery, but never sell your data. We maintain data sharing agreements where applicable.

### **Your Rights**

You have the right to request access to the data we hold, how it's used, and to ask for its deletion. Contact [info@visitabdn.com](mailto:info@visitabdn.com) for such requests.

### **Recruitment Data**

Personal data collected during job applications is used strictly for recruitment purposes, retained securely, and destroyed if you're not hired.

For the full and most current privacy policy, please visit: [\*\*VisitAberdeenshire Privacy Policy\*\*](#).

# Equal Opportunities and Dignity at Work

The Company is committed to promoting equal opportunities in employment and creating a workplace culture in which diversity and inclusion is valued and everyone is treated with dignity and respect. Employees and job applicants will receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, gender or sexual orientation (Protected Characteristics).

This policy sets out our approach to diversity, equity and inclusion and the avoidance of discrimination at work. Our aim is to encourage and support diversity, equity and inclusion and actively promote a culture that values difference and eliminates discrimination in our workplace. It applies to all aspects of employment with the Company, including recruitment, pay and conditions, benefits, flexible working, leave, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.

### **Discrimination**

You must not unlawfully discriminate against, harass or victimise other people including current and former employees, job applicants, clients, customers, suppliers and visitors because they have any of the protected characteristics. There is also protection against discrimination where someone is perceived to have one of the protected characteristics or where they are associated with someone who has a protected characteristic. This applies in the workplace, outside the workplace (when dealing with customers, suppliers or other work-related contacts and on work-related trips or events including social events).

The following forms of discrimination are prohibited under this policy and are unlawful:

- Direct discrimination: treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or because they have a disability.
- Indirect discrimination: a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others and is not justified. For example, requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.

- Harassment: this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt with further in our Anti-Harassment and Bullying Policy.
- Victimisation: retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.
- Disability discrimination: this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

### **Recruitment and selection**

Recruitment, promotion and other selection exercises such as redundancy selection, will be conducted on the basis of merit, against objective criteria that avoid discrimination. Shortlisting should be done by more than one person if possible.

Vacancies should generally be advertised to a diverse section of the labour market. Advertisements should avoid stereotyping or using wording that may discourage particular groups from applying.

Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.

Job applicants should not be asked about health or disability before a job offer is made, except in the very limited circumstances allowed by law, for example, to check that the applicant could perform an intrinsic part of the job (taking account of any reasonable adjustments), or to see if any adjustments might be needed at interview because of a disability. Where necessary, job offers can be made conditional on a satisfactory medical check.

We are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to satisfy current immigration legislation. The list of acceptable documents is available from UK Visas and Immigration.

### **Disabilities**

If you are disabled or become disabled, we encourage you to inform the Company about your condition so that we can discuss with you and consider what reasonable adjustments or support may be appropriate.

If you experience difficulties at work because of your disability, you may wish to contact your line manager or the HR & Business Services Manager to discuss any reasonable adjustments that would help overcome or minimise the difficulty. Your line manager or the HR & Business Services Manager may wish to consult with you and your medical adviser about possible adjustments. We will consider the matter carefully and try to accommodate your needs within reason. If we consider a particular adjustment would not be reasonable, we will explain our reasons and try to find an alternative solution where possible.

### **Part time and fixed-term work**

Part-time and fixed-term employees should be treated the same as comparable full-time or permanent employees and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate), unless different treatment is appropriately justified.

### **Training and promotion and conditions of service**

Training needs will be identified through regular review of performance. You will be given appropriate access to development and training opportunities to enable you to progress within the organisation and all promotion decisions will be made on the basis of merit.

### **Breaches of this policy**

We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary and Capability Procedure. Serious cases of deliberate discrimination may amount to gross misconduct resulting in summary dismissal.

If you believe that you have suffered discrimination you can raise the matter through our Grievance Procedure or Anti-Harassment and Bullying Policy. Complaints will be treated in confidence and investigated as appropriate.

You must not be victimised or retaliated against for making a complaint with regards to discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and will be dealt with under our Disciplinary and Capability Procedure.

# Ethics Policy

### **Purpose**

This policy applies to Aberdeen & Aberdeenshire Tourism Company Limited – trading as VisitAberdeenshire (the Company).

This policy outlines the Company's ethical stance towards carrying out business and helps to communicate this to all employees of the Company.

This policy is applied in conjunction with the Company's Anti-Bribery Policy and the current Employee Handbook.

### **Definition**

Ethical considerations affect the Company's treatment and stance towards all employees, suppliers and customers.

The Company has principles and ideals that it follows and upholds in all its interactions, whether internal or external. The Company ensures through its management and employees that it adheres to these principles.

### **Our ethical stance**

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships.

We take an environmentally responsible approach and operate inclusively and respectfully of others.

Any deliberate failures to comply with, or decisions to deliberately deviate from, the ethical principles of the Company may trigger the need for disciplinary action to be taken.

### **Induction**

During the standard Company induction, the Company's ethical stance is communicated to all employees. Responsibility for the provision of the induction programme rests with the line manager for the employee and our HR and Business Services Manager.

### **Training**

To ensure that existing employees continue to understand and apply the principles of the Company's ethical stance, laid out above, the HR department carries out periodic training sessions to ensure employees understand the ethical positions taken by the Company on a wide range of subjects and areas and can apply these when carrying out their role.

### **Interactions with third parties, customers and suppliers**

The key touch points outside the Company should be governed by the ethical guidelines laid out above, as set out during induction and re-emphasised in training. Customer interactions should always apply the Company's ethics practices, as should all dealings with suppliers and other third parties.

### **Communication**

Any communication carried out by employees on behalf of the Company or in order to carry out their job role must apply the Company's ethical stance, as set out above.



# Modern Slavery and Human Trafficking Statement

This statement applies to Aberdeen & Aberdeenshire Tourism Company Limited – trading as VisitAberdeenshire (the Company).

### **Definitions**

The Company considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

### **Commitment**

The Company acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Company understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Company does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Company in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Company strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in United Kingdom and in many cases exceeds those minimums in relation to its employees.

### **Organisational structure**

The Company is a centralised organisation operating from a head office in Aberdeen, Scotland with less than 15 employees.

### **Supply chain structure**

In order to fulfil its activities, the main supply chains of the Company include those related to professional services, media and marketing or training and consulting services based primarily within the United Kingdom.

### **Organisational policies**

The Company has an Employee Handbook that sets out a number of policies which further define its stance on modern slavery including the Equal Opportunities and Dignity at Work Policy.

### **Assessing and managing risk**

In general, the Company considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it takes steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

### **Steps**

The Company has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

Should it be discovered that a supplier is, or is suspected, to be involved in modern slavery, the Company would take immediate steps to terminate the contract.

This statement is made in pursuance of s.54(1) of the Modern Slavery Act 2015 and will be reviewed as appropriate.

# Sustainability Objectives

The Destination Aberdeen & Aberdeenshire: A Framework for Growth 2022-2030 states that actions should be informed by and contribute towards net zero ambitions.

Within the sector, there are demand-side opportunities as sustainable travel becomes more of a priority among visitors<sup>1</sup> and their agencies, and supply-side opportunities to support local businesses to improve their sustainable credentials and to meet demand.

VisitAberdeenshire can play an effective role in addressing opportunities and challenges. To strengthen both what we do and what we say, we have developed seven sustainability objectives aligned with the UN Sustainable development goals to guide our work.

**In house, VisitAberdeenshire will:**

- Aim to reduce the carbon footprint impact of our business and strive for more efficient, greener and sustainable ways of working. For example, the VisitAberdeenshire office is based within P&J Live, the most sustainable venue of its type in the United Kingdom. (SDG 12)
- Support employee health and wellbeing and aim to educate, improve and increase sustainability knowledge and awareness. (SDG 8)
- Buy local where local delivers best value for money , and procure goods and services as sustainably as possible. (SDG 12)
- Support our community and engage with our local schools wherever possible to encourage sustainable growth within the next generation of the tourism and hospitality workforce. (SDG 4)

**Externally, VisitAberdeenshire will:**

- Promote sustainability within the tourism and hospitality sector, encourage collaboration, inspire innovation and continuous improvement. (SDG 13)
- Always look to promote sustainable experiences and travel to positively influence the actions of our visitors. (SDG 12)
- Work with our stakeholders, suppliers and the wider tourism sector to make sustainable business simple. (SDG 17)

# Whistleblowing

We are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.

This policy covers all employees, officers, consultants, contractors, casual workers and agency workers.

### **What is whistleblowing?**

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

### **How to raise a concern?**

We hope that in many cases you will be able to raise any concerns with your line manager. However, where you prefer not to raise it with your line manager for any reason, you should contact the Whistleblowing Officer (the HR & Business Services Manager or the Chief Executive. Contact details are at the end of this policy.

We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or trade union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

You and anyone accompanying you (including witnesses) cannot make electronic recordings of any meetings conducted under this procedure. A written record of the meeting will be produced.

### **Confidentiality**

We hope that you will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

### **External disclosures**

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally. The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external. Public Concern at Work operates a confidential helpline. Their contact details are at the end of this policy.

### **Protection and support for whistleblowers**

We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer (the HR & Business Services Manager) OR the Chief Executive immediately.

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action. In some cases, the whistleblower could have a right to sue you personally for compensation in an employment tribunal.

However, if we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.

### **CONTACTS**

Whistleblowing Officer  
Fiona Douglas  
**07743 771 775**  
**[fiona.douglas@visitabdn.com](mailto:fiona.douglas@visitabdn.com)**

Chief Executive  
Chris Foy  
**07849 984 506**  
**[chris.foy@visitabdn.com](mailto:chris.foy@visitabdn.com)**

Protect (Independent whistleblowing charity)  
Helpline: **0203 117 2520**  
Website: **<https://protect-advice.org.uk/>**

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