

Business ethics and integrity policy

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1 Purpose

- 1.1 We value our reputation for ethical behaviour, financial honesty, integrity and reliability. We have fundamental principles and values which we believe are the foundation of sound and fair business practice and as such are important to uphold. The trust and respect of our employees, customers, stakeholders and the general public are assets that cannot be bought and are the foundation of our success. For these reasons, our employees must adhere to these principles and values. The impact of any wrongdoing or unethical behaviour upon our business could be both damaging and detrimental.
- 1.2 Every employee has a right to expect that our business maintains proper standards and everyone has a duty to maintain these standards through their decisions, actions and what they say. A heavier responsibility is borne by those who hold positions of authority. They must openly demonstrate leadership in applying the practices outlined in this policy.
- 1.3 In turn, our success depends on the professionalism of all our employees. This relates to both internal and external dealings and how employees conduct themselves in relation to others, both within the work environment and at any work-related social events. All employees should conduct themselves in a responsible manner and we expect them to be courteous and respectful to customers, suppliers and colleagues and not behave in a discriminatory manner.
- 1.4 This policy shall be reviewed from time to time. The policy covers the main issues that may be encountered at work, and sets out standards of professionalism and integrity to be maintained by individuals.
- 1.5 All employees have the right and the responsibility to resolve doubts or uncertainties about ethical questions and should, in the first instance, contact their manager for guidance prior to taking any action. An 'open door' policy is encouraged throughout our business so that, if necessary, such queries can be brought to the attention of higher levels of management.
- 1.6 Specific concerns can also be raised without fear of discrimination by using our whistleblowing policy.
- 1.7 This policy is non-contractual but sets out the business ethics, corporate values and standards of behaviour expected of our managers and employees across our company.

2 Scope

- 2.1 This policy applies to all employees, at all levels within our business, including casual workers, those on fixed-term contracts. It also applies to consultants, contractors or any other people or any other company associated with our business or any of our subsidiaries, associated companies, group company and their employees.

3 Our ethical principles

3.1 We believe that behaving ethically is an essential part of how we do business.

3.2 Our principles of ethical business apply when dealing with our customers, suppliers, employees, and all others with whom we work or whom we encounter while representing us are:

- **Trust and integrity**

We pride ourselves on our reputation, and our customers trust in the services that we provide. Where we make a commitment, we believe that it is important that this is delivered.

- **Accountability**

We believe that we are all personally answerable for our conduct and actions.

- **Compliance**

We will comply with all national and international laws and regulations that relate to how we operate as a business. We also aim to have processes that are recognised as best practice and that go beyond regulatory compliance.

- **Transparency**

We will answer all questions in a frank and straightforward manner. We will not attempt to provide misleading information.

- **Dignity and respect**

We will value each individual and treat them with dignity and respect.

4 Responsibilities

4.1 Managers' responsibilities

4.1.1 Managers are expected to set a good example by following the principles set out in this policy, and should be alert to, and where appropriate correct, unacceptable behaviour.

4.2 Employees' responsibilities

4.2.1 Employees are expected to follow this policy. They must ensure that their own conduct does not cause offence or misunderstanding, and should maintain high levels of professionalism with regards to their appearance, communication and their general behaviour.

5 Our key business principles

This policy cannot cover every circumstance where an employee may need to consider their conduct. Where there is any doubt regarding any ethical matter, the individual should in the first instance contact their manager for advice.

Our key business principles are outlined below:

5.1 Discrimination or harassment

We will not tolerate discrimination or harassment of any kind.

- 5.1.1 All employees are entitled to fair treatment by others, and to be treated with respect and dignity. In return, they are expected to treat others in this way.
- 5.1.2 It is our policy to offer explicit and fair terms of employment and to provide employees with appropriate opportunities to develop their skills and progress in their careers. It is our intention to honour all applicable terms and conditions of employment.
- 5.1.3 We consider that the diversity of our workforce is a strength to the business. All employees regardless of any protected characteristic (age, disability, gender reassignment, marital or civil partnership status, pregnancy or maternity, race (including nationality, ethnic or national origin) will be treated equally, with fairness, honesty, respect and dignity. Harassment (including sexual, physical, mental, use of abusive language or offensive gestures) or bullying, in any shape or form will not be tolerated. Any employee who is found to have acted in a discriminatory manner or to have behaved in a way which indicates bullying or harassment will be subject to disciplinary action and all employees are strongly encouraged to report such incidents.

5.2 Working environment

We will maintain a safe and healthy environment for people to work in.

- 5.2.1 We recognise our responsibility and the benefits of providing a safe working environment. We aim to comply with legislation, safety rules and procedures to prevent accidents from happening. We do this by understanding the risks present in our working environment and how accidents can occur. We have appropriate processes in place to reduce risks within the workplace.
- 5.2.2 Everyone within our organisation has a responsibility for safety in the workplace, and we must all:
 - be familiar and comply with our Health and Safety policy and all local operating procedures
 - think through and identify the risks and hazards in our working environment
 - intervene immediately if someone is putting themselves or others at risk
 - report all safety risks promptly to a manager
 - be proactive in managing our responsibilities for the environment

- have a personal and collective responsibility to use resources efficiently and consider the impact of our products and operations on the environment, and to take steps to address these

5.2.3 We recognise that our day-to-day operations have the potential to damage the environment. To keep our impact to a minimum we will manage our resources efficiently and minimise waste. We should also take responsibility for reducing the unnecessary use of energy, water and other materials and try to recycle where possible.

5.3 Confidentiality

We will ensure confidentiality.

- 5.3.1 The nature of our business means that employees may be exposed to sensitive and confidential information relating to our business, our customers and suppliers.
- 5.3.2 All employees have a responsibility to protect all confidential and sensitive information relating to the business as well as that of our customers and suppliers.
- 5.3.3 Employees should take steps to ensure that confidential information regarding previous, current or prospective employees, workers, business associates, customers and suppliers is protected. Information concerning our business activities should not be disclosed to unauthorised persons whether internal or external. Confidential information should be clearly marked as such. Under no circumstances should such information be disclosed to third parties including the media. This obligation continues when an employee leaves the business. The only exception is if the information is in the public domain.
- 5.3.4 Confidential information, including personal data or files should not be left unattended on desks or tables and should be locked away when away from the workstation. Personal data must not be disclosed to other employees unless it is required for their work. Any requests for personal information, either in writing or on the telephone (eg from the police, HMRC or any other body) must be referred to the relevant person.
- 5.3.5 All computer produced output and manual records must be securely disposed of. Anyone based off-site must shred any information they hold which is no longer required.
- 5.3.6 Access passwords or other security information should not be disclosed to anyone unless they are authorised to have this information.
- 5.3.7 Employees must not use such information obtained in the course of their employment for their personal gain or benefit, nor should they pass it on to others who might use it in such a way.
- 5.3.8 The confidentiality obligations contained in this policy are in addition to any obligations detailed in employment contracts, any other policies or documentation issued.

5.4 Bribery

No bribes can be given or received.

- 5.4.1 A bribe includes any payment, benefit, or gift offered or given with the purpose of influencing a decision or outcome. The payment may not be of large value and it could be as simple as a lunch or, for example, an invitation to a sporting event. We are each responsible for knowing what our business guidance allows and what the law permits regarding gifts and benefits given to or received from customers, suppliers or other third parties. Guidance and approval should always be obtained from a manager before accepting or giving any gift or entertainment.
- 5.4.2 It is our policy to comply with all laws, rules and regulations designed to prevent bribery and corruption. Under UK law, bribery and corruption is punishable for individuals by up to ten years' imprisonment, and if the business is found to have failed to prevent bribery or taken part in corruption it could face an unlimited fine, be excluded from tendering for Government contracts and face significant damage to its reputation.
- 5.4.3 We, or any of our employees, will not offer, give or receive bribes or inducements of any sort for any purpose. The payment, or offer, of bribes, or the provision of or offer of gifts or anything of value or other advantage for improper purposes to obtain or retain business or any other benefit (whether for the business or any other party) is prohibited. Such payments or gifts may result in immediate dismissal for those involved in their payment or receipt.
- 5.4.4 If we decide that a gift, prize, sample, reward, etc might constitute a bribe or other inducement, the employee will be required to give the gift to their manager, who will return it to the donor with a standard covering letter. In other instances, the employee will be required to return the gift to the donor with a polite note explaining our policy.
- 5.4.5 Any employee who suspects that bribery may have taken, or is taking place, is required to report this to his/her manager or an appropriate person.
- 5.4.6 The following are strictly forbidden:
- giving or receiving money or other cash equivalent as a business gift
 - giving or receiving gifts or hospitality that are too costly or frequent to be within the customs of the marketplace
 - giving any gifts or hospitality to reward a government employee
 - giving or receiving gifts or hospitality that influence or give the appearance of influencing business judgement
 - offering a gift or hospitality when it is known that it would violate the recipient's policy to accept it
 - giving or receiving entertainment, such as tickets to a sporting event, where a representative of the organisation offering the gift will not be accompanying the recipient to the event

- 5.4.7 We recognise that over and above the commission of any crime, any involvement in bribery will also reflect adversely on our image and reputation. Our aim therefore is to limit any exposure to bribery by:
- setting out a clear anti-bribery stance
 - training all employees to recognise and avoid the use of bribery by themselves and others
 - encouraging employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately
 - rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution
 - taking firm and vigorous action against any individual(s) involved in bribery
- 5.4.8 In addition, we are required to keep financial records and to have appropriate internal controls in place which will evidence the business reason for making payments to third parties.
- 5.4.9 We all share in a responsibility to prevent bribery and if employees are aware or suspect that bribery is taking or has taken place, they have a duty to report this to their manager or an appropriate person.

5.5 Business gifts and hospitality

Receipt of gifts

- 5.5.1 Any employee who is given a gift (whether in the form of an item, money, vouchers etc), prize, sample, reward or competition entry by a business contact (e.g. customer, supplier - actual or potential) must disclose the fact of the gift and its nature to their manager.
- 5.5.2 Sometimes there will be an exceptional case where we decide, for example, that the gift, prize, sample, reward or competition entry was made as a token of the donor's gratitude for a service carried out to a very high standard. In these circumstances, the recipient may be allowed to retain the gift. However, this will be subject to approval from a Director.
- 5.5.3 Promotional gifts which are not of significant value, such as stationery, are exempt from this policy and need not be disclosed. However, employees are reminded that, since such gifts are sent only to a limited number of employees, these should be given to a Director for distribution amongst all employees.
- 5.5.4 If the gift is of significant value and, for example, the recipient is in a position to influence business dealings, its acceptance will be treated as gross misconduct.

Giving and offering gifts

- 5.5.5 While it is our policy not to offer gifts to suppliers and customers etc, other than at Christmas, we recognise that, on occasions this may be appropriate, for example, when someone carries out work on a voluntary basis or for a nominal fee, or if a service has been carried out in an exceptional manner.
- 5.5.6 In such a case, employees should put a request in writing to a Director explaining:
- who the gift is for
 - why it should be given
 - the nature of the gift and its approximate value
- 5.5.7 If the request is approved, the employee's manager must authorise the purchase of the gift.
- 5.5.8 No employee must offer any inappropriate gift or benefit to existing or potential contacts.
- 5.5.9 Employees who send gifts which have not been approved in accordance with this policy will not be reimbursed for the cost of the gift. Furthermore, such action may, depending on the circumstances, be treated as a disciplinary offence.

Samples / branded products

- 5.5.10 Employees are not permitted to loan, advertise, sell (including on any internet auction site), or give to charity any of our samples or branded products without the permission of a Director.

Relationships with suppliers and customers

- 5.5.11 Employees must not enter into any personal or private purchasing arrangements with any of our suppliers or customers, service users, members.
- 5.5.12 Employees may not use any of our relationships with our suppliers or customers, service users, members to obtain any gratuities. This includes customer branded products and merchandise or services.

5.6 Anti-competitive practices

- 5.6.1 If two or more businesses agree not to compete with each other in certain ways, it is called a cartel and the rules on cartels apply to businesses of any size. The rules on cartels cover -
- Price fixing
 - Bid rigging
 - Sharing markets or customers
 - Sharing commercially sensitive information
 - Engaging in other anti-competitive practices

An agreement does not have to be in writing for it to be illegal. You can break the law if you have an informal conversation (or 'gentleman's agreement') with another business, even if the agreement is not carried out.

- 5.6.2 It is forbidden for any company employee or representative to discuss prices we are going to charge our customers with any competitors or intermediaries.
- 5.6.3 It is forbidden for any company employee or representative to discuss bids for a contract tender with any competitors or intermediaries.
- 5.6.4 Anti-competition law does not permit business to share markets or customers, this means you would be breaking the law if you agree with another business –
 - Not to approach each other's customers
 - Not to compete with them for customers
- 5.6.5 Anti-competition law does not permit business to share information with other businesses that might reduce competition between each other, for example information about –
 - Prices
 - Production
 - Our suppliers, customers, or contractors
 - The markets we sell, or plan to sell, to

This includes sharing information through a third party

- 5.6.6 It is forbidden to engage in other anti-competitive practices such as -
 - Agreeing with our competitors to reduce production to raise market value
 - Have long-term exclusive contracts with any customers or suppliers

Where there is any doubt regarding anti-competitive behaviour employees should in the first instance contact their manager for advice.

5.7 Conflicts of interest

Conflicts of interest must be avoided and in all cases must be reported.

- 5.7.1 Everyone has a responsibility to disclose and seek direction on any issues that may potentially conflict with their responsibilities to the business.
- 5.7.2 Conflicts of interest happen in situations where competing interests impair our ability to make objective and unbiased business decisions. In all cases employees must disclose any potential conflict to their manager as soon as they become aware of it. In particular, employees are expected to declare any external employment or separate business interests of their own or those of their spouse, partner or child over the age of 18 in any trade, business or occupation whatsoever which is in any way similar to any of those in which our business is involved, whether or not such trade, business or occupation may be conducted for profit or gain.
- 5.7.3 A conflict of interest can take many forms, including:

- managing or recruiting a family member or friend
- having a second job, any outside directorships or other positions of responsibility or holding financial interests (including shareholdings and financial exposure both personally and through family relationships) in suppliers or customers
- a personal sexual or romantic relationship with a work colleague
- personal or family relationships with key management of customers and/or competitor companies
- the provision of advice to a customer which may be to the disadvantage of another customer of ours, particularly if such advice could be construed to have been based on information confidential to or sourced from another customer

5.8 Financial procedures and fraud prevention

- 5.8.1 We encourage all employees to maintain integrity and honesty in all financial transactions. We consider any illegal or unethical financial practices to be unacceptable.
- 5.8.2 We all share responsibility for preventing crime at work. If any individual becomes aware that a crime is planned or may have been committed, they are encouraged to advise their manager immediately.
- 5.8.3 Employees should not sign any document unless it has been checked thoroughly by someone with the appropriate authority to do so.
- 5.8.4 Any suspicious activity will be investigated. Fraud and theft will be regarded as gross misconduct.
- 5.8.5 Any fraudulent activities will be dealt with in accordance with our disciplinary policy. Such activities may include (but are not restricted to): falsification of personal information (eg qualifications); falsification of timesheets, work activity records, expense claims etc; attempts to forge any documentation.

5.9 Records

- 5.9.1 Our accounting and other records, including payroll, should be properly maintained and accurately reflect all transactions undertaken.
- 5.9.2 Employees who have access to records relating to themselves, friends or members of their family or with whom they have a close personal relationship should not alter these records and should arrange for any necessary processing to be undertaken by another authorised person.

5.10 Use and care of equipment and property

- 5.10.1 Employees are expected to take all necessary steps to prevent theft, loss, misuse or damage to our equipment and property. Such equipment should be used for business use only and not for any personal use unless specific permission has been given.

- 5.10.2 Our name is one of our most valuable assets and should not be jeopardised by inappropriate behaviour. In particular, it should not be used for unauthorised and/or personal profit or gain or for general publicity without specific permission.

5.11 Negligence

- 5.11.1 Negligence arises from an employee's failure to exercise reasonable care in their work.
- 5.11.2 Employees must not cause loss or damage through carelessness, negligence, a reckless act or breach of instructions.

6 Related policies and documents

- Data protection policy
- Disciplinary policy
- Equal opportunity policy
- Expenses policy
- Corporate social responsibility policy
- Environmental policy
- Health and safety policy
- Whistleblowing policy

The above list is not exhaustive.

7 Further information

Any queries or comments about this policy should be addressed to a manager in the first instance.

8 Policy owner

This policy is owned and maintained by the Directors.

9 Policy review date

Date last reviewed: 7/2/2022