



## **Ethical Behaviour Policy**

23<sup>rd</sup> August 2017

The requirements of this Ethical Behaviour Policy are mandatory and will be maintained by all who act, in whatever capacity, on behalf of the company.

The policy sets out the company's commitment to conducting all aspects of its business in an ethical and transparent manner. Our customers, employees, supply chain and the wider community are entitled to expect us to comply fully with all our legal responsibilities, as well as our core business values and ethical principles.

This policy has been developed to safeguard the business interests of the company and its employees.

The company seeks to promote a culture of honesty and integrity in all its dealings and it will not tolerate acts of fraud, bribery, price fixing, theft of assets/data from the business, trafficking, slavery, mistreatment or any other forms of exploitation or dishonesty. We are also committed to ensuring that neither the company's integrity nor reputation is put at risk.

This policy is intended to protect the company and its employees. Breaches of this policy may lead to disciplinary action or criminal prosecution.

### ***Gifts and hospitality***

Bona fide gifts and hospitality are recognised as an established part of how suppliers maintain their relationships with customers. However, ethical difficulties may arise where a past, present or future supplier offers something which has the potential of impairing judgement (e.g. gifts or hospitality which appear lavish or overly generous may be attempted bribes, as could the provision of services which are offered free of charge, or which are offered at significantly less than market price).

Should any employee consider that an offer or provision of any gift or hospitality is an inducement, bribe or if it in any way makes them feel uncomfortable, this must be rejected and reported immediately to the company.

### ***Conflicts of interest***

The company understands that conflicts exist and having conflict of interest does not necessarily mean an employee or representative has done anything wrong. The company recognises that employees and representatives may be subject to conflicting/competing interests, but that they need to take care to manage these conflicts with integrity and transparency.

Failing to properly declare and manage a conflict of interest may undermine reputation and credibility, and at the same time damage the financial and/or reputational interests of the company.

A conflict of interest is any private or outside interest, relationship or appointment which may come into conflict with the duties and responsibilities an employee or company representative has towards the company.

The company expects to be advised of any such relationship which might cause a conflict of interest. This includes any material interests with a third party that could impair the ability to act in the best interest of the company, or which could be seen to undermine its ethical standards.

### ***Modern Slavery***

The company will not tolerate modern slavery (slavery, servitude, forced and compulsory labour, and human trafficking). Modern slavery is a crime and a violation of human rights.

The company has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity in all of its business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business, or in any of its supply chains.

The Modern Slavery Act 2015 is focused on tackling human trafficking and slavery, but also introduces an obligation on companies to be more transparent in their dealings with supply chains.

The company is committed to meeting its obligations under the Modern Slavery Act 2015 in both its business and supply chains. Contracts with suppliers will be subject to prohibition against the use of forced or trafficked labour and any other form of human slavery. The company expects suppliers to hold their own suppliers to the same high standards.

### ***Reporting concerns***

The company is committed to maintaining the highest standards of honesty, openness and accountability. We therefore actively encourage all employees and third parties to raise any concerns they may have about dishonesty or malpractice. We also recognise that employees and third parties may find it difficult to raise concerns so have provided the following options for such:

- 1) Notify a department Manager. Department Managers will treat reporting of any such concerns with the strictest of confidence, and are required to take appropriate action to prevent or deter dishonesty and malpractice. The department Manager does not have to be your own department Manager.
- 2) Contact Crime Stoppers by telephoning 0800 555 111, or by using the Crime Stoppers Anonymous Online Form.

We encourage you to report matters internally rather than externally in the first instance and you should use the methods above to report any breach or suspected breach of this Ethical Behaviour Policy. In particular:

- Instances of dishonest and unethical behaviour,
- Any concern about any issue or suspicion of modern slavery,
- A suspected criminal offence,
- A failure to comply with any legal or regulatory obligations,
- An act or omission that may endanger the health and safety of any individual,
- Damage to the environment,
- The deliberate concealment of information on any of the matters above.

The company has certain legal obligations to protect you from suffering any form of detriment as a consequence of raising a concern in good faith. Any disclosure made under this Ethical Behaviour Policy will be treated in the strictest of confidence.