



Ethics

Commitment

- The Group Board is committed to promoting the highest standards of ethical behaviour and requires employees to act according to our ethical principles. Bribery and corruption are not tolerated and will result in dismissal.
- The Group operates worldwide, under many different political systems. We obey the law, respect the customs and culture of the countries where we work and comply with national or international trade restrictions.
- In some countries where we operate, bribery and corruption are common practices. These damage the public interest and are illegal almost everywhere in the world.
- The Group prohibits the offering, giving, solicitation or acceptance of any bribe, whether cash or other inducement, or engaging in any other corrupt practice.
- The principles underpinning our corporate and personal behaviour are set out here. This policy will be reviewed annually and by exception should the need arise.

Responsibility

- A Group Board director is responsible for the Ethics Policy and for its effective implementation.
- Compliance with the Ethics Policy is monitored through our business management system (BMS).
- In respect of anti-bribery management, the specific requirements of the system are based on and conform to British Standard 10500.

Approach

Customers

- We act with integrity in the interests of our customers, maintain confidentiality of their information and aim to apply due skill, care and diligence in our services. We are committed to making our communications, marketing and publications factually correct, ethical and fair. We compete vigorously but do not seek to misrepresent our competitors.

Suppliers and business partners

- The Group seeks and establishes relationships with suppliers, subcontractors and other business partners based on mutual respect and good governance. We undertake appropriate due diligence in evaluating business partners to assess risk and avoid dealing with prospective partners where there is any suspicion of corruption. We seek contractual arrangements with major suppliers that allow us to withdraw from the contract in the event that unethical business practices become apparent.
- We use independent agents in some countries to represent us and promote our services. We monitor their conduct to ensure compliance with our policies and practices. Their remuneration must always be proper, appropriate and justifiable, at market value, for the services they provide.

Employees

- The Group complies with equal opportunities legislation and seeks to promote fair employment policies, within the framework of local culture and laws. We are committed to an inclusive working environment, in which no current or prospective employee is disadvantaged because of age, colour, disability, gender, gender reassignment, marital status, maternity/paternity, national/ethnic origin, race, religious belief or sexual orientation.
- We aim to promote on merit without discrimination and encourage employees to develop their skills and careers within the Group. We encourage effective communication with and between employees. We respect each other's customs, traditions and religious beliefs. We do not tolerate physical, mental or sexual harassment.
- We do not permit the use of business facilities or information for personal gain and require employees to resolve any conflicts of interest. Adherence to the Ethics Policy is a condition of employment.

Gifts and hospitality

- While appropriate business entertainment and gifts can generate goodwill and improve working relationships, employees must avoid situations that could interfere, or appear to interfere, with the impartial discharge of their duties.

Facilitation payments

- Facilitation payments are bribes paid to public officials to expedite actions they are already duty-bound to perform and are not permitted, unless personal safety or liberty is under threat.

Political contributions

- The Group prohibits the payment of donations to political parties or charities to obtain a business advantage and does not participate in party politics.

Health, safety and security

- We pursue the highest practicable standards of health, safety and security and aim to comply with all relevant statutes in order to minimise risks to employees and others affected by our operations.

Environment

- We seek to promote environmental protection and improvement through our activities and services including providing sustainable solutions, using resources efficiently, minimising waste and helping our customers adopt best environmental practices.

Community

- We seek to be good corporate citizens, to provide local employment and to contribute to the well-being of communities where we work. We encourage employees to take part in community, civic, professional and charitable activities.

Public interest disclosure ('whistle blowing')

- We take our ethics policies and procedures seriously and provide accessible channels, including a confidential helpline, through which employees can raise concerns.

Communication and training

- We train employees on Group ethics policies and procedures through e-learning, face-to-face training and as part of the induction process for new staff.



Keith Howells
Chairman