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DMA Ethics Policy
September 2025

Introduction

We want to continue to be an organisation that provides excellent customer service. We will do this with high ethical standards and engender mutual trust and respect with all stakeholders. We will achieve this through:

- Meeting, and where possible, exceeding all relevant legal requirements
- Behaving with honesty & integrity in all our relationships
- Acting ethically
- Maintaining internal controls that strive to ensure that standards are met

Ethics refers to the standards we hold for morally right and wrong conduct. The law in this country provides the framework for behaviour, but ethical standards often go beyond what is simply 'legal' or 'illegal'. Everyone at DMA must abide by our ethical standards.

The purpose of this policy is to set out our commitment to ethical behaviour. A summary of areas covered by this policy is detailed below. Should you have any questions in relation to this document please speak to a member of the Senior Leadership Team:

- Equality, Diversity & Inclusion (EDI)
- Corporate Social Responsibility ("CSR")
- Anti Bribery
- Anti Slavery
- Public interest disclosures

Equality, Diversity & Inclusion

Statement of intent

DMA believes that everyone has a right to be treated with dignity and respect, and to be provided with equal opportunities to flourish and succeed in an environment that enables them to do so. We also value

diversity of thought and experience within inclusive groups, organisations, and the wider community.

As a provider of property services we employ, and interact with, people with diverse characteristics, different experiences, and different needs and aspirations.

We are therefore in a great position to demonstrate our equality, diversity and inclusion principles in our own actions and behaviours and take a strategic lead in promoting equality, diversity, and inclusion in the facilities management industry.

Every person working in DMA has a personal responsibility for implementing and promoting the Equality, Diversity, and Inclusion (ED&I) Policy, and its principles in their day-to-day interactions with each other and when working with customers, partners, and the public.

This policy applies to all employees of DMA, and to visiting workers, students or those workers provided by a third-party agency.

General principles

It is our approach that we have a working environment that promotes dignity and respect and where individual differences, and the contributions made are recognised and valued:

- Everyone has the right to be treated with dignity and respect and to be included in all activities irrespective of a protected characteristic. No-one should suffer disadvantage (of experience or outcome) or be discriminated against in any other way.
- DMA is committed to identifying and removing barriers, making reasonable adjustments where deemed necessary and appropriate, and building a culture that values openness, fairness and transparency, where access to employment, work, and career progression is based on merit, demonstrable skills and experience
- DMA is an equal opportunities employer, operating in compliance with the Equality Act 2010 and as such is committed to eliminating discrimination, advancing equality of opportunity, and fostering good relations between people who share a relevant protected characteristic and people who do not share it

Responsibilities

DMA has a responsibility to:

- Maintain a workplace culture that is supportive and conducive to all aspects of ED&I and stimulate a working environment that promotes dignity and respect for all, whereby individual differences and the contributions of all employees are recognised and valued.
- Take swift and effective action when concerns related to ED&I are raised, and/or where standards are found to have fallen short of its expectations.
- Not discriminate because of the **protected characteristics** of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (which includes colour, nationality and ethnic or national origins), religion or belief, sex or sexual orientation, or because of any other relevant factor.
- Ensure that its employer activities and policies are barrier-free and reflect evidence-based, inclusive practice. It will collect and review a range of data to understand its performance and progress in this regard and to determine where action may be reasonable and helpful, to redress any identified imbalances in experience, representation, participation, or outcome.
- Equip employees to identify and remove barriers and take reasonable action to redress imbalances in the composition of the workforce.
- Provide information to enable all employees to understand and take ownership for their ED&I accountabilities. DMA will expect all employees to be aware of their responsibilities regarding ED&I in the workplace and have the knowledge and skills required to carry them out.
- Maintain ED&I governance, including external consultation and ensure that this Policy is fully endorsed and supported by the Group Supervisory Board.
- Work to ensure that its facilities, technologies and procedures are accessible and barrier free.
- Work to ensure that it assesses significant activities, services and events for potential barriers to participation, and that this membership and these contributions are as diverse as possible.

Employees have a responsibility to:

- Not discriminate because of the **protected characteristics** of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (which includes colour, nationality and ethnic or national origins), religion or belief, sex or sexual orientation, or because of any other relevant factor.
- Not commit any acts or behave in a manner that would contravene this Policy.

- Not instruct, induce or attempt to induce other employees to act in breach of this Policy.
- Help advance and foster inclusion and treat others with dignity and respect at all times.
- Take reasonable steps to ensure that their decisions are based on objective assessments.
- Cooperate with initiatives, training opportunities and resources introduced by DMA that support and enable understanding of ED&I accountabilities, knowledge and skills.

Employees are encouraged to:

- Advise HR if they become aware of any discriminatory conduct, either against themselves or any third party that contravenes this Policy.
- Update their diversity information on Bamboo. This will be used anonymously to help DMA ensure it is meeting its duty and ambitions to identify and address any adverse impact of its policies and activities.
- Identify barriers (behavioural/cultural and organisational - including processes, policies, and ways of working) associated with their work and identify ways in which these can be mitigated or eliminated.
- Identify opportunities to promote inclusion across their areas of work.

Legislation

It is unlawful to discriminate directly or indirectly in recruitment or employment because of age, disability, sex, gender reassignment, pregnancy, maternity, race (which includes colour, nationality and ethnic or national origins), sexual orientation, religion or belief, or because someone is married or in a civil partnership. These are known as "protected characteristics".

Discrimination after employment may also be unlawful, e.g. refusing to give a reference for a reason related to one of the protected characteristics. Legislation also exists to prevent less favourable treatment of workers such as staff on Fixed Term contracts or those employed as Agency Workers within DMA. Employees should not discriminate against or harass a member of the public in the provision of services or goods. It is unlawful to fail to make

reasonable adjustments to overcome barriers to using services caused by disability.

Reporting

Employees have a right to complain if they are treated in a manner that they believe constitutes harassment or bullying. This will include behaviour that has caused offence, intimidation, humiliation, embarrassment or distress.

Apart from complaints about the behaviour of colleagues, employees have the right to complain if they believe that they have been bullied or harassed by a third party, for example a customer or supplier. Employees who raise a genuine complaint under this policy will under no circumstances be subjected to any unfavourable treatment or victimisation because of making a complaint.

Examples of harassment or bullying would include:

- Over demanding requirements
- Sarcastic personal remarks about colleagues, especially those reporting to an employee
- Sexual, ageist, racial or disability related banter
- The display of material with sexual or racial overtones (even if not directed at the complainant) or which is derogatory about any type of unlawful discrimination
- Unwelcome touching
- Jostling, shoving or other forms of unwanted contact and/or intimidating or threatening postures
- Practical jokes, horseplay, personal insults and name calling, public or private humiliation
- Interference with personal property and/or equipment
- Freezing out or excluding, intimidation and threats in general

However, if it is established that an employee has made a deliberately false or malicious complaint against another person about harassment or bullying, disciplinary action will be taken against that employee.

Any employee who witnesses an incident that they believe to be the harassment or bullying of another member of staff should report the

incident in confidence either to a member of the Leadership Team. The Company will take all such reports seriously and will treat the information in strict confidence as far as it is possible to do so.

Types of discrimination

The following are brief explanations of types of discrimination:

Direct Discrimination

This is where a person is treated less favourably than another because of one or more of the protected characteristics. An example of direct discrimination would be refusing to employ a woman because she is pregnant. In limited circumstances, employers can directly discriminate against an individual for a reason related to any of the protected characteristics where there is an occupational requirement.

Indirect Discrimination

This is where a provision, criterion or practice is applied that is discriminatory in relation to individuals who have a relevant protected characteristic such that it would be to the detriment of people who share that protected characteristic when compared with people who do not, and it cannot be shown to be a proportionate means of achieving a legitimate aim.

Harassment

This is where there is unwanted conduct, related to one of the protected characteristics (other than marriage and civil partnership, and pregnancy and maternity) that has the purpose or effect of violating a person's dignity; or creating an intimidating, hostile, degrading, humiliating or offensive environment. It does not matter whether this effect was intended by the person responsible for the conduct.

Associative Discrimination

This is where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic (although it does not cover harassment because of marriage and civil partnership, and pregnancy and maternity).

Perceptive Discrimination

This is where an individual is directly discriminated against or harassed based on a perception that they have a protected characteristic when they do not, in fact, have that protected characteristic.

Third-Party Harassment

This occurs where an employee is harassed, and the harassment is related to a protected characteristic (other than marriage and civil partnership, and pregnancy and maternity), by third parties such as clients or customers.

Victimisation

This occurs where an employee is subjected to a detriment, such as being denied a training opportunity or a promotion because they made or supported a complaint or raised a grievance under the Equality Act 2010, or because they are suspected of doing so. However, an employee is not protected from victimisation if they acted maliciously or made or supported an untrue complaint.

Failure to Make Reasonable Adjustments

This is where:

- A provision, criterion or practice puts a disabled person at a substantial disadvantage in comparison with individuals who are not disabled, for example

corresponding only by email and phone with a person who is deaf instead of face to face

- A physical feature puts a disabled person at a substantial disadvantage in comparison with individuals who are not disabled, for example a design or building feature or equipment in the premises such as only having stairs and no lifts
- A disabled person would, but for the provision of an auxiliary aid, be put at a substantial disadvantage in comparison with individuals who are not disabled, for example providing assistive technologies to help visually impaired staff use computers

The potential discrimination occurs when the employer has failed to make reasonable adjustments to enable the disabled person to overcome the disadvantage.

Equality of opportunity

DMA will avoid unlawful discrimination and unjustified less favourable treatment in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy.

Person and job specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for candidates with a disability. Disability and personal or home commitments will not form the basis of employment decisions except where necessary.

DMA will consider any possible indirectly discriminatory effect of its standard working practices, including the number of hours to be worked, the times at which these are to be worked and the place at which work is to be done, when considering requests for variations to these standard working practices and will refuse such requests only if DMA considers it has good reasons, unrelated to any protected characteristic, for doing so. DMA will comply with its obligations in relation to statutory requests for contract variations and will also

make reasonable adjustments to its standard working practices to overcome barriers caused by disability.

DMA cannot lawfully discriminate in the selection of employees for recruitment or promotion, but we may use appropriate lawful methods, including lawful positive action, to address the under-representation of any group that the Company identifies as being under-represented types of job.

People not employed by DMA

DMA will not discriminate unlawfully against customers using or seeking to use goods, facilities or services provided by DMA.

Employees should report any bullying or harassment by customers, suppliers, visitors or others to their Manager who will take appropriate action. Agency workers will not be treated less favourably regarding pay and rights than permanent employees following completion of any qualifying criteria specified from time to time by the government.

Training

We offer to provide training in equal opportunities to managers and others likely to be involved in recruitment or other decision making where equal opportunities issues are likely to arise.

We offer to provide training to all existing and new employees and others engaged to work at DMA to help them understand their rights and responsibilities and what they can do to help create a working environment free of bullying and harassment. The Company will provide additional training to managers to enable them to deal more effectively with complaints of bullying and harassment.

Grievances

If an employee considers they may have been unlawfully discriminated against or if they feel they have been subject to harassment of any kind, they may use the Company's Grievance Procedure to make a complaint.

However, before raising a formal complaint, employees are encouraged in the first instance to talk directly and informally to the person whom they believe is harassing them/causing offence and explain clearly what aspect of the person's behaviour is unacceptable and request that it stop. It may be that the person whose conduct is causing offence is genuinely unaware that their behaviour is unwelcome or objectionable and that a direct approach can resolve the matter without the need for formal action. Where an employee would like support to make such an approach, they should contact a Manager or a member of the Leadership Team.

If, however, an employee feels unable to take this course of action, or if they have already approached the person to no avail, or if the harassment is of a very serious nature, they may elect to raise a formal complaint. Formal complaints may be raised with either the employee's Line Manager or, if preferred, the Leadership Team.

DMA will take any complaint seriously and will seek to resolve any grievance which it upholds. Staff will not be penalised for raising a grievance, even if the grievance is not upheld, unless the complaint is both untrue and made in bad faith.

Social value

Environmental impacts

In line with our Environmental Policy, we want to continue to be an organisation that improves its environmental performance continually, prevents pollution, and complies with, and where possible exceeds, applicable environmental legislation. We will do this through:

- Making the most efficient and effective use of all resources, encouraging all staff to develop a sustainable approach to their work.
- Minimising carbon emissions from business travel by avoiding unnecessary travel and travelling by public transport where appropriate.
- Promoting sustainable modes of transport for commuting to work

- Reducing the amount of waste generated and disposed to landfill through a waste minimisation and recycling programme

Supporting our community

We want to be an organisation that continues to undertake and support initiatives aimed at helping local communities. We will do this through:

- Operation of the DMA Charitable Trust, a charitable organisation that has helped hundreds of local causes since 1972
- Enabling our staff to continue to support charitable organisations every year through payroll giving, voluntary fundraising activities and giving them the time and opportunity to participate in charitable events
- Encouraging staff to take on volunteering positions in the local communities, particularly with young people
- Sponsoring promising local sports talent to give them an opportunity to succeed, and encouraging them to give motivational talks to young people in local schools and colleges
- Operation of our apprenticeship scheme which takes on and develops local young people
- Work experience opportunities offered in conjunction with local schools and colleges

Influencing our industry

We will play a positive role in our industry, which is a major employer, a major contributor to the UK's carbon footprint, and is embedded in the local communities across the country.

We will seek positions on influential trade organisation boards so that we can directly influence the role our industry plays in social value and public policy. We will add our weight towards:

- Making sustainable development a central part of strategy for the future development.
- Promoting equality and diversity within work environments.
- Corporate Social Responsibility aims and targets in general

Preventing sexual harassment in the workplace

DMA are committed to providing a working environment free from sexual harassment and ensuring all staff are treated, and treat others, with dignity and respect. We recognise that sexual harassment can occur both in and outside the workplace, such as on business trips, or at work-related events or social functions, or on social media.

Sexual harassment or victimisation of any member of staff, or anyone they come into contact with during the course of their work, is unlawful and will not be tolerated. We will take active steps to help prevent the sexual harassment and victimisation of all staff. Anyone who is a victim of, or witness to, sexual harassment is encouraged to report it in accordance with this policy. This will enable us to take appropriate action and provide support. Sexual harassment can result in legal liability for both the business and the perpetrator, whether they work for us or are a third party outside of our control. Sexual harassment may result in disciplinary action up to and including dismissal.

The purpose of this policy is to set out a framework for line managers to deal with any sexual harassment that occurs by staff (which may include consultants, contractors and agency workers) and also by third parties such as customers, suppliers or visitors to our premises.

This policy does not form part of any contract of employment or contract to provide services, and we may amend it at any time.

This policy applies to all employees, officers, consultants, self-employed contractors, casual workers, agency workers, volunteers and interns.

This policy is reviewed annually. We will monitor its effectiveness.

What is sexual harassment?

Sexual harassment is any unwanted physical, verbal or non-verbal conduct of a sexual nature that has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to sexual harassment.

It also includes treating someone less favourably because they have submitted or refused to submit to unwanted conduct of a sexual nature, or that is related to gender reassignment or sex, in the past.

Sexual harassment may include, for example:

- Unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing;
- Continued suggestions for sexual activity after it has been made clear that such suggestions are unwelcome;
- Sending or displaying material that is pornographic or that some people may find offensive (including emails, text messages, video clips and images sent by mobile phone or posted on the internet);
- Unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless); or
- Offensive emails, text messages or social media content.

A person may be sexually harassed even if they were not the intended target. For example, a person may be sexually harassed by pornographic images displayed on a colleague's computer in the workplace.

Victimisation includes subjecting a person to a detriment because they have done, or are suspected of doing or intending to do, any of the following protected acts:

- Bringing proceedings under the Equality Act 2010.
- Giving evidence or information in connection with proceedings under the Equality Act 2010.
- Doing any other thing for the purposes of or in connection with the Equality Act 2010.
- Alleging that a person has contravened the Equality Act 2010.

Victimisation may include, for example:

- Denying someone an opportunity because it is suspected that they intend to make a complaint about sexual harassment.
- Excluding someone because they have raised a grievance about sexual harassment.
- Failing to promote someone because they accompanied another staff member to a grievance meeting.
- Dismissing someone because they gave evidence on behalf of another staff member at an employment tribunal hearing.
- Sexual harassment and victimisation are unlawful and will not be tolerated. They may lead to disciplinary action up to and including dismissal if they are committed:

- o In a work situation.
- o During any situation related to work, such as at a social event with colleagues.

- o Against a colleague or other person connected to us outside of a work situation, including on social media.

- o Against anyone outside of a work situation where the incident is relevant to your suitability to carry out your role.

We will take into account any aggravating factors, such as abuse of power over a more junior colleague, when deciding the appropriate disciplinary action to take.

If any sexual harassment or victimisation of staff occurs, we will take steps to remedy any complaints and to prevent it happening again. These may include updating relevant policies, providing further staff training and taking disciplinary action against the perpetrator.

Third-party harassment occurs where a person is harassed or sexually harassed by someone who does not work for, and who is not an agent of, the same employer, but with whom they have come into contact during the course of their employment. Third-party harassment could include, for example, unwelcome sexual advances from a client, customer or supplier visiting the employer's premises, or where a person is visiting a client, customer or supplier's premises or other location in the course of their employment.

Third-party sexual harassment can result in legal liability and will not be tolerated. All staff are encouraged to report any third-party harassment they are a victim of, or witness, in accordance with this policy.

Any sexual harassment by a member of staff against a third party may lead to disciplinary action up to and including dismissal.

We will take active steps to try to prevent third-party sexual harassment of staff. [These may include warning notices to customers or recorded messages at the beginning of telephone calls].

If any third-party harassment of staff occurs, we will take steps to remedy any complaints and to prevent it happening again. These may include warning the harasser about their behaviour, banning them from our premises, reporting any criminal acts to the police, and sharing information with other branches of the business.

If you are being sexually harassed: informal steps

If you are being sexually harassed, consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome or makes you uncomfortable. If this is too difficult, you should speak to your line manager or the HR Department, who can provide confidential advice

and assistance in resolving the issue formally or informally. If you feel unable to speak to your line manager because the complaint concerns them, you should speak informally to the HR Department. If this does not resolve the issue, you should follow the formal procedure below.

If you are not certain whether an incident or series of incidents amounts to sexual harassment, you should initially contact your line manager or the HR Department informally for confidential advice.

If informal steps are not appropriate, or have been unsuccessful, you should follow the formal procedure set out below or refer to our Grievance Procedure.

Raising a formal complaint

If you wish to make a formal complaint about sexual harassment, you should submit it in writing to your line manager or the HR Department. If the matter concerns your line manager, you should submit it to the HR Department.

Your written complaint should set out full details of the conduct in question, including the name of the harasser, the nature of the sexual harassment, the date(s) and time(s) at which it occurred, the names of any witnesses and any action that has been taken so far to attempt to stop it from occurring.

If you wish to make a formal complaint about victimisation, you should submit it in writing to [your line manager or the HR Department. If the matter concerns your line manager, you should submit it to the HR Department.

Your written complaint should set out full details of the conduct in question, including the name of the person or persons you believe have victimised you, the reason you believe you have been victimised, the nature of the victimisation, the date(s) and time(s) at which it occurred, the names of any witnesses and any action that has been taken so far to attempt to stop it from occurring.

As a general principle, the decision whether to progress a complaint is up to you. However, we have a duty to protect all staff and may pursue the matter independently if, in all the circumstances, we consider it appropriate to do so.

If you witness sexual harassment or victimisation

Staff who witness sexual harassment or victimisation are encouraged to take appropriate steps to address it. Depending on the circumstances, this could include:

- Intervening where you feel able to do so.
- Supporting the victim to report it or reporting it on their behalf.
- Reporting the incident where you feel there may be a continuing risk if you do not report it.
- Co-operating in any investigation into the incident.

All witnesses will be provided with appropriate support and will be protected from victimisation.

Formal Investigations

We will investigate complaints in a timely, respectful and confidential manner. Individuals not involved in the complaint or the investigation should not be told about it.

We will arrange a meeting with you, usually within one week of receiving your complaint, so that you can give your account of events. You have the right to be accompanied by a colleague or a trade union representative of your choice, who must respect the confidentiality of the investigation.

Where your complaint is about an employee, we may consider suspending them on full pay or making other temporary changes to working arrangements pending the outcome of the investigation, if circumstances require. The investigator will also meet with the alleged harasser [who may also be accompanied by a colleague or trade union representative of their choice] to hear their account of events. They have a right to be told the details of the allegations against them, so that they can respond.

Where your complaint is about someone other than an employee, such as a customer, supplier or visitor, we will consider what action may be appropriate to protect you and anyone involved pending the outcome of the investigation, bearing in mind the reasonable needs of the business and the rights of that person. Where appropriate, we will attempt to discuss the matter with the third party.

We will also consider any request that you make for changes to your own working arrangements during the investigation. For example, you may ask for changes to your duties or working hours to avoid or minimise contact with the alleged harasser.

It may be necessary to interview witnesses to any of the incidents mentioned in your complaint. If so, the importance of confidentiality will be emphasised to them.

At the end of the investigation, the investigator will submit a report to a manager. The manager will arrange a meeting with you, usually within a week of receiving the report, in order to discuss the outcome and what action, if any, should be taken. You have the

right to bring a colleague or a trade union representative to the meeting. A copy of the report and the manager's findings will be given to you and to the alleged harasser.

Action following the investigation

If the manager considers that there is a case to answer and the harasser is an employee, the matter will be dealt with as a case of possible misconduct or gross misconduct under our Disciplinary Procedure. Our investigation into your complaint may be put on hold pending the outcome of the Disciplinary Procedure. Where the disciplinary outcome is that sexual harassment occurred, prompt action will be taken to address it. If the harasser is a third party, such as a customer or other visitor, we will consider what action would be appropriate to deal with the problem.

Whether or not your complaint is upheld, we will consider how best to manage the ongoing working relationship between you and the person concerned. It may be appropriate to arrange some form of mediation or counselling, or to change the duties, working location or reporting lines of one or both parties.

Any staff member who deliberately provides false information in bad faith, or who otherwise acts in bad faith as part of an investigation, may be subject to action under our Disciplinary Procedure. However, you will not be disciplined or treated detrimentally because your complaint has not been upheld.

Appeals

If you are not satisfied with the outcome you may appeal in writing to the person named in the outcome letter, stating your full grounds of appeal, within one week (or as otherwise notified) of the date on which the decision was sent or given to you.

We will hold an appeal meeting, normally within one week of receiving your written appeal. Where practicable, the appeal hearing will be conducted by a senior manager who has not been previously involved in the case and, if possible, is senior to the individual who conducted the previous meeting. They may ask anyone previously involved to be present. You have the right to bring a colleague or trade union representative to the meeting.

We will confirm our final decision in writing, usually within one week of the appeal hearing. This is the end of the procedure and there is no further appeal.

Protection and support for those involved

Staff who make complaints, report that they have witnessed wrongdoing, or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under our Disciplinary Procedure.

If you believe you have suffered any such treatment you should inform your line manager or the HR Department. If the matter is not remedied, you should raise it formally using our Grievance Procedure or this procedure if appropriate.

We will monitor the treatment and outcomes of any complaints of sexual harassment or victimisation we receive to ensure that they are properly investigated and resolved, those who report or act as witnesses are not victimised, repeat offenders are dealt with appropriately, cultural clashes are identified and resolved and workforce training is targeted where needed.

Support and guidance can also be obtained from the following external services:

- The Equality Advisory and Support Service (www.equalityadvisoryservice.com).
- Protect (www.protect-advice.org.uk).
- Victim support (www.victimsupport.org.uk).
- Rape crisis (www.rapecrisis.org.uk).
- Rights of women (England and Wales) (www.rightsofwomen.org.uk).

Reporting outcomes, confidentiality and record-keeping

Confidentiality is an important part of the procedures provided under this policy. Details of the investigation and the names of the person making the complaint and the person accused must only be disclosed on a "need to know" basis. Breach of confidentiality may give rise to disciplinary action under our Disciplinary Procedure.

When appropriate and possible, where a complaint is upheld, we will advise the complainant of the action that has been taken to address their specific complaint and

any measures put in place to prevent a similar event happening again.

Information about a complaint by or about a staff member may be placed on their personnel file, along with a record of the outcome and of any notes or other documents compiled during the process. These will be processed in accordance with our obligations in relation to Data Protection.

Anti bribery

Introduction

Introduction

This section of policy provides guidance on our position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010.

It is the Company's approach that:

- The Company is committed to the highest standards of ethical conduct and integrity in its business activities
- The Company's Senior Leadership Team are committed to implementing effective measures to prevent, monitor and eliminate bribery and to foster a culture of integrity in which bribery is unacceptable
- The Company will not tolerate any form of bribery by, or of, its employees, consultants or any person or body acting on its behalf
- The Company sees that its zero-tolerance approach towards bribery ultimately will deliver business benefits in terms of maintaining the Company's reputation and maintaining confidence in the Company by its customers and business partners

A summary of areas covered is below. Should you have any questions in relation to this document please speak to HR.

- Bribery Act 2010
- What is prohibited and permitted?
 - What is prohibited
 - Records
 - Facilitation payments
 - Corporate entertainment, gifts, hospitality and promotional expenditure

- Procedure
 - Reporting suspected bribery
 - Action by the Company
 - Review of procedures and training

Bribery Act 2010

Bribery Act 2010

The Company is committed to complying with the Bribery Act 2010 in its business activities.

Under the Bribery Act 2010, a bribe is a financial or other advantage that is offered, promised or given with:

- The intention of inducing or rewarding improper performance of a relevant function or activity; or
- The knowledge or belief that accepting such an advantage would constitute the improper performance of a relevant function or activity

Bribery can be committed whether the advantage is offered, promised or given directly or through a third party.

A “relevant function or activity” includes public functions, business activities or any activity performed during a person’s employment, or on behalf of another company or individual, where the person performing the function or activity is expected to perform it in good faith, impartially, or in accordance with a position of trust.

The function or activity may be performed anywhere in the world and does not have to have any connection with the UK.

A criminal offence will be committed under the Bribery Act 2010 if:

- An employee or associate person offers, promises or gives a bribe
- An employee or associated person requests agrees to receive or accepts a bribe
- An employee or associated person bribes a foreign public official

Bribery of a foreign public official is committed if someone offers, promises or gives a bribe to a foreign public official with the intention of obtaining or retaining business or a business advantage, and local law does not permit or require the official to be influenced by a bribe in the performance of his/her role.

The Company will also commit an offence under the Bribery Act 2010 if its employee or an associated person commits an act of bribery for obtaining business or business advantage for the Company and the Company does not have the defence that it has adequate procedures in place to prevent bribery by its employees or associated persons.

What is prohibited and permitted?

What is prohibited?

**The Company strictly prohibits employees or associated persons from:
Offering, promising, giving, soliciting or accepting any bribe of any kind**

This prohibition applies whether the bribe takes the form of cash, a gift or other inducement to, or from, any person or company, whether a public or government official, official of a state-controlled industry, political party or a private person or company, and regardless of whether the employee or associated person is situated in the UK or overseas.

This prohibition also applies to indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance, for example through consultants, contractors or sub-contractors, agents or sub-agents, sponsors or sub-sponsors, joint-

venture partners, advisors, customers, suppliers or other third parties.

Making or receiving Facilitation payments

Facilitation payments are payments made to government officials for carrying out or speeding up routine procedures, and are distinct from an official, publicly available fast-track process. Facilitation payments, or offers of such payments, will constitute a criminal offence by both the individual concerned and the Company under the Bribery Act 2010.

What is permitted?

The Company permits corporate entertainment, gifts, hospitality and promotional expenditure that are undertaken:

- To improve the image and reputation of the Company
- To present the Company's products and services effectively; or
- For establishing or maintaining good business relationships

Hospitality and promotional expenditure however must be:

- Reasonable and proportionate
- Arranged in good faith, and
- Not offered, promised or accepted to secure an advantage for the Company or any of its employees or associated persons or to influence the impartiality of the recipient

This principle applies to all employees and associated persons. However, those with marketing or customer relationship responsibilities will be given further training on the specific procedures that they are required to follow.

Employees and, where relevant, associated persons should submit requests for proposed hospitality and promotional expenditure well

in advance of proposed dates to the Managing Director.

Employees are required to set out in writing:

- The objective of the proposed customer entertainment or expenditure
- The identity of those who will be attending
- The organisation that they represent
- Details of the proposed activity

The Company will approve business entertainment proposals only if they demonstrate a clear business objective and are appropriate for the nature of the business relationship. The Company will not approve business entertainment where it considers that a conflict of interest may arise or where it could be perceived that undue influence, or an improper business advantage is being sought (for example, prior to a tendering exercise).

If an employee or associated person wishes to provide gifts to suppliers, customers or other business contacts, prior written approval from the Managing Director is required, together with details of the intended recipients, reasons for the gift and business objective. These will be authorised only in limited circumstances and will be subject to a maximum of £50 per recipient.

Records

Employees and, where applicable, associated persons, are required to take care to ensure that all company records are accurately maintained in relation to any contracts or business activities, including financial invoices and all payment transactions with clients, suppliers and public officials.

Due diligence must be undertaken by employees and associated persons prior to entering into any contract, arrangement or relationship with a potential supplier of services, agent, consultant or representative in accordance with the Company's procurement procedures.

Employees and associated persons are required to keep accurate, detailed and up-to-date records of all corporate hospitality, entertainment or gifts accepted or offered.

Charitable donations

The Company considers that charitable giving can form part of its wider commitment and responsibility to the community. The Company may in its discretion support several charities and may also support fundraising events involving employees.

Procedures

Reporting gifts, rewards or entertainment

Any gifts, rewards or entertainment received or offered from customers, public officials, suppliers or other business contacts should be reported immediately to the Manager. In certain circumstances, it may not be appropriate to retain such gifts or be provided with the entertainment and employees and associated persons may be asked by the Manager to return the gifts to the sender or refuse the entertainment, for example, where there could be a real or perceived conflict of interest. As a rule, small tokens of appreciation, such as

flowers or a bottle of wine, may be retained by employees.

Reporting suspected bribery

The Company depends on its employees and associated persons to ensure that the highest standards of ethical conduct are maintained in all its business dealings. Employees and associated persons are requested to assist the Company and to remain vigilant in preventing, detecting and reporting bribery.

Employees and associated persons are encouraged to report any concerns that they may have to the Managing Director as soon as possible. Issues that should be reported include:

- Requests for cash payments
- Requests for unusual payment arrangements, for example via a third party
- Requests for reimbursements of unsubstantiated or unusual expenses
- A lack of standard invoices and proper financial practices
- Any suspected or actual attempts at bribery
- Concerns that other employees or associated persons may be being bribed
- Concerns that other employees or associated persons may be bribing third parties, such as clients or government officials

Any reports will be thoroughly and promptly investigated by the Managing Director in the strictest confidence. Employees and associated persons will be required to assist in any investigation into possible or suspected bribery.

Employees or associated persons who report instances of bribery in good faith will be supported by the Company. The Company will ensure that the individual is not subjected to detrimental treatment because of his/her report. Any instances of detrimental treatment by a fellow employee because an employee has made a report will be treated as a disciplinary offence. An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, employees and associated persons should not agree to remain silent. They should report the matter to the Managing Director.

Employees are also referred to the Public Interest Disclosure Policy and Procedure herein.

Action by the Company

The Company will fully investigate any instances of alleged or suspected bribery and act as appropriate if it finds that an act of bribery has been committed.

Employees suspected of bribery may be suspended from their duties while the investigation is being carried out. The Company will invoke its disciplinary procedures where any employee is suspected of bribery, and proven allegations may result in a finding of gross misconduct and immediate dismissal.

The Company may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of, the Company who are found to have breached this policy.

The Company may also report any matter to the relevant authorities, including the Financial Services Authority, the Director of Public Prosecutions, Serious Fraud Office, Revenue and Customs Prosecutions Office and the Police. The Company will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

Review of procedures and training

The Company will communicate its anti-bribery measures to employees and associated persons. The Company will set up training sessions where it deems necessary.

The Company will monitor and review the implementation of this policy and related procedures on a regular basis, including reviews of internal financial systems, expenses, corporate hospitality, gifts and entertainment policies.

Employees and those working for, or on behalf of, the Company are encouraged to contact the Managing Director with any suggestions, comments or feedback that they may have on how these procedures may be improved.

Introduction

Introduction

This policy is designed to clarify and provide guidance on the Company's stance regarding anti-slavery and human trafficking. A summary of areas covered by this policy is detailed below. Should you have any questions in relation to this document please speak to the HR Manager:

General principles of Policy

- Responsibility for the Policy
- Communication and awareness of the Policy
- Breach of the Policy

General Principles of Policy

- Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.
- The Company has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships. As a company we aim to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- The Company is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers and other business partners. As part of our contracting processes, we include specific

prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

- This policy applies to all persons working for us 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.

Responsibilities of this Policy

The Company's Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Operations Director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

Compliance

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager or the Operations Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or the Operations Director as soon as possible.

If you are unsure about whether an act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the Operations Director.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment because of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Operations Director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breach

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy

Public interest disclosure

Introduction

This policy and the associated procedure are designed to clarify and provide guidance on raising matters of concern with the Company.

General Principles of Policy

It is the Company's approach that:

- The Company conducts its business with the highest standards of integrity and honesty and expects all employees to maintain the same standards in everything they do
- Employees are encouraged to report any wrongdoing by the Company or any other employees that falls short of these business principles
- The Company is keen to hear of any concerns that employees may have about wrongdoing at work and encourage employees to use the procedure prescribed below wherever possible
- The Company recognises that employees may not always feel comfortable about discussing their concerns internally especially if they believe that the Company is responsible for the wrongdoing

Procedure and Responsibility

The Company will follow the procedure below as far as is reasonably practicable if an employee has a reasonable belief about any concerns relating to wrongdoing at work which are in the public interest, including any criminal offence, a failure to comply with legal obligations, a miscarriage of justice, a health and safety danger, an environmental risk or a concealment of any of these. The Public Interest Disclosure (whistleblowing) has two levels to the procedure as follows:

Managers

If appropriate, the employee should discuss the matter with their Manager in the first instance. An approach by an employee to their Manager will be treated as confidential and will not result in any report to anyone within the business unless there is a health and safety risk to other employees or a criminal offence is involved.

If the matter requires further investigation it will be carried out and the employee will be informed of the outcome and what, if any, action has been taken.

Directors

If the employee remains unhappy about the speed or conduct of the investigation or the way in which the matter has been resolved, the employee should refer the matter to a Director. When the Director has investigated the complaint, they will inform the employee of the result of the investigation and what, if any, action has been taken.

Protection from Detriment

The Company confirms that no employee who makes a bona fide report under this procedure will be subjected to any detriment as a result, in accordance with section 47B of the Employment Rights Act 1996. If an employee believes they are being subjected to a detriment by any person within the business because of their decision to invoke the procedure the employee must inform a Director immediately and appropriate action will be taken to protect from any reprisals.

If it should become clear that the procedure has not been invoked by a reasonable belief that the disclosure is in the public interest, for example personal matters such as an employee claiming their contract of employment had been breached as they had not been provided with the correct personal protective equipment required to perform their role or they had received an incorrect amount of holiday pay, this will be dealt with in accordance with the terms of the Grievance Procedure.

Dealings with External Bodies

The Company recognises there may be matters that cannot be dealt with internally and external authorities will need to become involved. Where the employee reasonably believes that the appropriate action has not been taken, they should report the matter to the relevant authority. There are a number of bodies to which qualifying disclosures may be made, including HM Revenue & Customs, the Health & Safety Executive and the Environment Agency.

Rev 9 - 18 Sep 2025 (AW)

Addition of sections that focus on Anti-Money Laundering, Anti-Facilitation of Tax Evasion (CFA 2017), and Anti-Fraud.

Rev 8 - 22 Nov 2024 (CR)

Reviewed to now include required information around preventing sexual harassment.

Rev 7 - 27 Jul 2024 (AW)

Reviewed with no amends

Rev 6 - 28 Jul 2023 (AW)

1. Moved to Trainual
2. Combined previous Policies - Anti-bribery, Anti-slavery, CSR, EDI, Public interest disclosure
3. Reviewed and updated, including removal of out-of-date roles and systems

Rev 5 - 3 Dec 2022

Review and scope change to match ISO certification

Rev 4 - 17 Oct 2022 (AW)

Equality section re-written as a full EDI Policy

Rev 3 - 1 Jul 2022 (AW)

Reviewed

Rev 2 - 18 Dec 2021 (AW)

Reviewed and updated for new roles in the company

Rev 1 - 9 Aug 2019 (LM)

Logo change & footer update

Rev 0 - 31 Jul 2018 (AW)

Re-written and re-formatted