

William Martin, part of Marlowe Plc group is the independent legal entity responsible for the provision of Health, Safety and Compliance related Consultancy Services and Software Solutions.

Our Directors, Managers and employees at William Martin fully understand the importance of impartiality, throughout the delivery of our consultancy services and advice.

William Martin ensures that all employees, associates and other personnel remain impartial, throughout all their dealings with existing or prospective clients, at all times.

William Martin will evaluate potential risks to its impartiality on an ongoing basis via risk assessment, internal audit, management review and consultation with appropriate parties. Where any such risks are identified, measures shall be put in place to eliminate or minimise them.

The following principles have been established to ensure impartiality is both maintained and demonstrable:

- William Martin operates autonomously as part of Marlowe, including separate management structure, independent technical and operational governance processes and systems, and independent technical delivery and support teams.
- William Martin will not engage in any activities which could compromise its impartiality. Any activities
  that could be deemed to prevent such a risk will be subject to review and assessment, and then only
  accepted where a conflict of interest is deemed not to be present.
- Any existing or new relationships with companies, organisations and individuals will be risk
  assessed and reviewed on a regular basis to ensure that the services offered do not pose any
  conflict of interest or risks to impartiality.
- Our Technical Consultants are required to be registered with the relevant professional and accrediting bodies including UKAS, IOSH, IFE, BAFE and LCA, and therefore subject to independent review and audit.
- Technical Consultants are legally bound to follow their professional 'codes of conduct' at all times.
  These generally relate to demonstration of integrity, competence, respect and service, any
  misconduct is subject to investigation and can result in disciplinary action including penalties and/or
  exclusion.
- All our employees, associates or others contracted to work on behalf of William Martin Compliance are required to declare any current or past relationships, or external activities that could be deemed to be a potential conflict of interest.
- William Martin will only make available commissions or inducements in respect of offering additional services to clients in the form of referrals, where it can be clearly demonstrated that the fee will in no way affect the outcome of a risk assessment, advice or other action. Note: offering additional services to clients will be based on the strict objective of assisting and supporting clients achieve their compliance goals as opposed to individual employees benefiting financially.
- Any commissions or inducements will be subject to review ensuring that the process has been conducted in accordance with protocol and that any such payments are fully documented and recorded.
- Technical Consultants will not be put under any pressure and will not be influenced in any way to come to a particular conclusion regarding the result of an audit, that could be deemed to be acting without impartiality.
- Any persons found to be acting outside of scope, or in breach of this policy or related codes of conduct, will be subject to formal investigation, which could result in cessation of activities for and on behalf of William Martin.