

# Ethics Policy

Document Owner	Version	Classification Confidential (Co) Private (Pr) Public (Pu)	Latest Revision Date	Details of Revision	Date of Next Review (max 24 months)
People Director	1	Pu	15.06.23	New document	15.06.25

**Scope:**

Marlowe SRC Division

**Objective:**

The purpose of this ethics policy is to establish a culture of openness, trust and integrity in business practices.

**Responsibilities:**

Effective ethics is a team effort involving the participation and support of every employee. Every director, manager and employee must consistently maintain an ethical stance and support ethical behaviour.

**Standard Reference:**

ISO 9001 Clause 5.1

**Definition:**

N/A

We are committed to protecting employees, the Companies and their business partners from illegal or damaging actions by individuals, either knowingly or unknowingly.

This policy applies to employees, contractors, consultants, temporary and other workers, including all personnel affiliated with third parties. Appropriate and timely measures will be taken in correcting the issue if the ethical code is broken. Any infractions of this code of ethics may result in disciplinary action against you. .

The leadership teams promote honesty and integrity as a top priority. Under no circumstances will any acts of bribery or corruption be tolerated. Senior managers have a duty to disclose any conflict of interests regarding their position within the Company.

All employees will treat everyone fairly, have mutual respect, promote a team environment, and avoid the intent and appearance of unethical or compromising practices. All employees should maintain ethical values and should always act honestly and without deception. Employees must disclose any conflict of interests regarding their position within the Company.

Every employee must understand the Company anti-bribery policies and Bribery Programme in accordance with this ethics policy and operate in line with these policies at all times.

The Company promotes a trustworthy and honest atmosphere to reinforce the vision of ethics within the company.

The Company has a senior member of staff responsible for delivering the ethics policy to all employees and for addressing any concerns.

The Company will avoid the intent and appearance of unethical or compromising practice in relationships, actions and communications. No acts of harassment or discrimination will be tolerated.

The Company will act ethically and responsibly in accordance with laws in force at that time and will not accept any behaviour not in line with Company ethical standards.

Employees will not use corporate assets or business relationships for personal use or gain. Employees are not to commit acts of bribery or corruption neither for personal or Company use or gain in line with the Company bribery policy and Programme.

Employees should not knowingly or recklessly be involved in, or do any of the following: • Offer, give, demand or accept any bribe or other improper advantage.

- Participate in any dishonest or deceptive activity, including in relation to any selection, certification, approval or management process.
- Provide, conceal, or approve work, materials, equipment or services which are not of the quality and quantity required under contract.
- Provide false, inaccurate, or misleading information.
- Dishonestly withhold information.
- Make or submit false, inaccurate, misleading, or exaggerated records, invoices, claims, applications for variations or extensions of time, or requests for payment.
- Dishonestly refuse or fail to approve, or delay in approving, work, materials, equipment, services, invoices, claims, applications for variations or extensions of time, or requests for payment.
- Dishonestly refuse or fail to pay, or delay in paying, sums due.

Directors and/or those with management responsibility should, in addition to the above, act as follows:

- Do not instruct, authorise or condone, expressly or impliedly, any corrupt activity.
- Make proper enquiries regarding any suspicion of corruption of which you become aware.
- Take reasonable preventive measures to stop corruption for which the Company may be liable.
- Report any suspicion of corruption to the board of directors.