



Policy:	Code of Ethics Policy		
Author / Owner:	People Team		
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Version Control			
Date:	Version:	Author:	What's changed:
23/11/2022	V1	G Wheatley & T Lancaster	First draft created

1. Introduction

1.1. The Company is committed to ensuring a fair and ethical working environment and the rights of our colleagues are respected by the implementation of the Code of Ethics Policy.

2. Overview

2.1. The Code of Ethics Policy defines the broad principles with which we seek to conduct business and the behaviours we expect from our colleagues, contractors, vendors, suppliers and partners.

2.2. Our policy is informed by the [Institute of Business Ethics Organising for Ethics discussion paper](#)

3. Responsibilities

It is the responsibility of all **line managers** to:

- Be familiar with this policy
- Be professional and supportive of employees

It is the responsibility of our **colleagues** to:

- Be familiar with this policy
- Follow the procedure in terms of keeping the company informed

It is the responsibility of **the People Team** to:

- Maintain this policy and communicate any changes
- Provide advice & guidance
- Ensure that this policy and procedure is implemented effectively, in a consistent and fair manner

4. Principles

4.1. These are the principles that are supported by our Code of Conduct and that inform our other policies:



- **Competence and accountability:** take ownership for the quality of your work and your own skills development.
- **Environment:** minimise our negative impact on the planet.
- **Integrity and honesty:** tell the truth and avoid conflicts of interest.
- **Lawfulness:** follow the law and ask for expert advice if unsure.
- **Respect for others:** treat people as you want to be treated. Make sure you're objective and fair and don't discriminate against others.
- **Teamwork:** collaborate, share your skills and knowledge, and ask for help.

5. Context

5.1. The Code of Conduct explores how all of these principles should be supported through individual behaviour. The table below lists other policies and guides that respond to different principles:

Behaviour	Policy / Guide
Competence & accountability	Code of Conduct Drug Alcohol & Other Substances Policy Flexible Working Policy Learning & Development Policy Training Policy
Environment	Carbon Reduction Plan Environmental Policy & Procedure Sustainable Procurement Policy
Integrity and honesty	Anti-Bribery Corporate Hospitality Policy Conflict of Interest Policy Whistleblowing Policy
Lawfulness	Anti-Bribery & Corporate Hospitality Policy Health & Safety Policy



Respect for others	Anti-Slavery Human Trafficking Policy Equality, Diversity & Inclusion Policy Harassment Policy Health & Safety Policy
Teamwork	Code of Conduct Guide to Home Working

6. Terms & Conditions

- 6.1. All contractual terms & conditions are unaffected by this policy.
- 6.2. Where an employee has any questions or queries in relation to the Code of Ethics Policy, they are encouraged to contact the People Team.