



Business Ethics Policy

Introduction

We are committed to achieving the highest standards of quality, honesty, openness and accountability in all of our activities. We also believe that we have a moral obligation to take account of the impact of our activities on the local, national and global economy, the environment and the communities in which we operate. We aim to reduce any adverse effects our activities may have to a minimum and to make a positive contribution where reasonably possible. This policy is non-contractual but sets out the business ethics, corporate values and standards of behaviour expected of our managers and employees in every aspect of our operation.

Scope

The policy applies to all of our employees, workers, managers and directors, and any sub-contractors we may employ.

Organisation and responsibilities

Board of Directors

The Board of Directors are ultimately responsible for:

- acting at all times with integrity and honesty and within the law
- acting responsibly in leading and directing all business activities in relation to any impact we may have on the environment, the local, national and global economy and the communities in which we operate
- declaring any interests in other businesses or organisations that may conflict with our business interests or ethical principles
- establishing our values and ethical principles and determining our business ethics strategy
- seeking always to uphold and promote our reputation locally and nationally with businesses and the community at large
- regularly seeking the opinions of employees, suppliers and customers in reviewing the agreed values and ethical principles
- taking action promptly and effectively to deal with any situation where our standards or rules are breached.

Managers and Supervisors

All Managers and Supervisors are responsible for:

- acting at all times with integrity and honesty and within the law
- promoting our values and ethical principles amongst the workforce
- seeking always to uphold and promote our reputation
- ensuring that the views and opinions of employees are communicated upwards
- taking action promptly and effectively to deal with any situations where our standards or rules are breached.



All employees and sub-contractors

All employees and sub-contractors, at all levels within Anglia Suspended Ceilings Limited, are required to:

- act at all times with integrity and honesty and within the law
- support and promote our values and ethical principles
- adhere to our standards of conduct and behaviour
- seek always to uphold and promote our reputation
- report any concerns regarding the actions of any employee, manager or director either directly to senior management or our independent ethics monitor. Silence may be construed as condoning the act.

As an employer, Anglia Suspended Ceilings Limited will:

- act fairly and responsibly in all matters relating to our employees and sub-contractors
- create a supportive, honest and open environment for employees to work in
- treat all individuals with dignity and respect
- seek to eliminate prejudice, discrimination and victimisation
- provide a safe and healthy environment in which to work
- where possible, provide opportunities for personal growth and professional development
- support all employees to enable them to be fulfilled in their working lives.

As a business partner, Anglia Suspended Ceilings Limited will:

- compete robustly but fairly in our market
- provide value for money and high quality service for our customers
- make prompt payment to our suppliers
- not offer or accept inducements to further our business.

As a partner in the communities in which we operate, Anglia Suspended Ceilings Limited will:

- respect the local community in which we operate
- regularly review our activities (modifying these where appropriate) to ensure our contribution to the communities in which we operate is positive
- support local businesses as far as possible by sourcing products and services locally, reduce, as far as possible, the impact of our activities on local communities in terms of waste management, emissions, impact on the landscape and transportation planning.



To minimise our impact on the environment, Anglia Suspended Ceilings Limited will, as far as possible:

- source products and services locally
- use sustainable raw materials
- use energy efficient fuel sources
- reduce waste and dispose of this properly
- use the minimum amount of packaging required for marketing purposes and for the protection of our products in transit
- work only with suppliers with similar ethical values regarding the environment

To contribute positively to the local, national and global economy, Anglia Suspended Ceilings Limited will, as far as possible:

- work with local businesses as far as possible to support local economic growth
- work only with organisations that pay their employees a fair living wage
- work with organisations that support the sustainable growth of third world economies.

Standards of conduct and behaviour

General standards

All staff are expected to behave with absolute honesty and integrity at all times and to adhere to our ethical principles and values. Staff shall never use their position and authority with us for personal gain. Failure to adhere to our standards of conduct and behaviour may result in action being taken in accordance with our disciplinary procedure. This normally covers only employment-related activities but may also apply to activities or actions outside employment where these have a bearing on our reputation or result in an unacceptable risk.

Conflict of interests

Any employee who has a business interest that may conflict with our business interests, ethical principles or values must declare it immediately to the Directors.

A conflict of interest may occur if an employee is in a position to influence a decision that may result in a personal gain for him or her, a relative or close associate as a result of our business dealings. Such interests may also include working as an employee or advising or having any involvement in a competitor business. In addition, where a close family member or associate has a controlling or significant interest in a company whose business interests may conflict with our business interests, ethical principles or values, this must also be declared. If an employee is unsure whether or not something constitutes a conflict of interest, he or she should seek clarification from his or her manager.

Recruitment

Our recruitment process will be fair, equitable and non-discriminatory. Appointments will be made solely on ability to perform the duties required. Anyone involved in the selection process must declare any personal relationships with candidates immediately they are known and alternative arrangements may be made.



Outside employment

Anyone holding or seeking to hold other employment must discuss this with his or her manager immediately. A reasonable request to undertake additional employment will not be refused, however we reserve the right to refuse permission and to terminate the employment of an individual who refuses to relinquish the secondary employment where this results in the individual exceeding the limit for the average weekly hours of work under the Working Time Regulations and where an opt-out agreement is not signed; where the business interests of the secondary employer conflict with our interests; or where the secondary employment has a detrimental effect on the work the employee does for us (e.g. where the employee's performance suffers as a result of tiredness).

Confidentiality

Confidential information, including any information regarding employees, business associates or business activities, should not be disclosed to unauthorised persons whether internal or external. Confidential information should be clearly marked as such if it is not to be disclosed. Staff must have written authority before disclosing confidential information to any third party.

Confidential information, including personal data or files should not be left unguarded in areas where there is public access. Personal data must not be disclosed to other employees unless it is required for their work. Any requests for personal information, either in writing or on the telephone, eg from the police, HMRC or any other body, must be referred to the Directors.

Access passwords or other security information should not be disclosed to other staff unless authorised to have this information. Confidential information should be locked away when the employee is away from his or her desk or office. All computer produced output and manual records must be shredded and securely disposed of. Any staff based off-site must shred (or return to the office for shredding) any information they hold which is no longer required.

Award of contracts

On no occasion may employees put themselves, and therefore us, in a position of obligation. Awards of contracts will be made only on the basis of their value for money, quality, ability to deliver the product or service required and taking account of the business ethics and corporate values of the business tendering for the contract.

All contracts must be arranged through our standard procurement process and authorised in writing by the Directors. No staff member is permitted to derive, directly or indirectly, any personal advantage from purchases made by us or from the award of contracts.

Gifts and hospitality

From time to time we may offer reasonable gifts and/or hospitality to clients. Any employee wishing to offer such gifts must seek written authority in advance from the Directors. Such gifts/hospitality should not be offered outside of the terms on which we normally conduct our business.



Any gifts and/or hospitality received from clients, suppliers, potential suppliers or others must be reasonable and accepted on the basis that they are without favour, inducement, reward or in any way connected with performance. The difference between legitimate gifts/hospitality and bribery lies in the intention with which the gifts/hospitality are provided, and that is something to be inferred from all the circumstances, including the relationship between the giver and recipient, their respective financial and social positions and the nature and value of the gift/hospitality.

Modest gifts or hospitality such as lunches in the course of working visits are acceptable, however those valued over £20 must be declared to the Directors. Care should be taken when accepting gifts and/or hospitality on a regular basis. The value of such gifts and/or hospitality should be recorded and monitored carefully to ensure that overall the value is reasonable. Money (in any form) should never be accepted.

Any offers of gifts and/or hospitality for inducement or reward must be politely refused and any such offers should be reported to the Directors. Account must be taken of cultural issues when giving or receiving gifts and/or hospitality so as to avoid causing offence or misunderstanding regarding the basis on which they are given or received.

Fraud

Employees should not sign any document unless they have checked this thoroughly and have the appropriate authority to do so.

Any fraudulent activities will be dealt with in accordance with our disciplinary procedure. Such activities may include (but are not restricted to): falsification of personal information (eg qualifications); falsification of timesheets, work activity records, expense claims etc; attempts to forge any documentation.

Documentation

Our accounting and other records should be properly maintained and accurately reflect all transactions undertaken.

Any employee who has access to records relating to him or herself, his or her friends or members of his or her family or with whom he or she has a close personal relationship should not alter these records and should arrange for any necessary processing to be done by another authorised employee.

Equipment and property

Employees are expected to take all necessary steps to prevent theft, loss, misuse or damage to our equipment and property. Such equipment should be used for business use only and not for any personal use unless specific permission has been given. Our name is also one of our most valuable assets and should not be jeopardised by inappropriate behaviour. In particular, it should not be used for unauthorised and/or personal profit or gain or for general publicity without specific permission.



Money laundering

Money laundering is the process or scheme by which both the identity of "dirty money" or money representing the proceeds of crime (which may include proceeds of drug trafficking, white collar crime, tax evasion etc) and the true ownership of those proceeds is changed, so that the money appears to come from a legitimate or lawful source.

In many instances the money representing the proceeds of crime will pass through a number of financial centres and entities in an effort to disguise the source of the money. It is an offence to assist in money laundering, fail to report knowledge or suspicion of money laundering, or to prejudice an investigation by tipping off or informing the person who is the subject of a suspicious report.

Any employee who is suspicious of, or has knowledge of, any activity which may involve money laundering should speak to the Directors.

Implementation, monitoring and review of this policy

This policy will take effect from 23rd March 2012. The Managing Director has overall responsibility for implementing this policy, which will be reviewed on a regular basis following its implementation (at least annually) and additionally whenever there are relevant changes in legislation or to our working practices.

The Directors will appoint an Independent Ethics Monitor, who will monitor this policy and report their findings on a quarterly basis.

Any queries or comments about this policy should be addressed to the Managing Director.

Signature:

Date: 26 March 2012



Signed
David Mulley
Director

26th March 2012