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## 1. Purpose

- 1.1 <<Company Name>> is committed to the practice of responsible corporate citizenship.
- 1.2 Through its business activities, the Company seeks to protect and promote the human rights and dignity of its employees and agents.
- 1.3 Further the Company is committed to protecting the rights of all of those whose work contributes to the success of the Company, including those employees and agents.
- 1.4 The Company is aware that it is essential that all those associated with the Company adhere to this policy, including those who are not receiving bribes of any form.
- 1.5 This policy is non-exhaustive and covers all aspects of the Company's business activities.

## 2. Human Rights

- 2.1 The Company is vehemently opposed to the use of slavery in all forms; cruel, inhuman or degrading treatment; and any attempt to control or reduce the freedom of thought, expression or movement.
- 2.2 The Company will ensure that all employees, agents and contractors are entitled to their human rights as set out in the Universal Declaration of Human Rights and the Human Rights Act 1998.
- 2.3 The Company will not enter into any business arrangement with any person, company or organisation that would breach the human rights of its workers or who breach the human rights of those affected by the organisation's activities.

## 3. Workers' Rights

- 3.1 The Company is committed to complying with all relevant employment legislation and regulations and to ensuring that its practices meet or exceed the recommended standard.
- 3.2 No worker should be discriminated against on the basis of age, gender, race, sexual orientation, marital status or pregnancy. All workers should be treated equally. Workers with the same experience and qualifications should receive equal pay for equal work.
- 3.3 No worker should be prevented from joining or forming a staff association or trade union, nor should any worker suffer any detriment as a result of joining, or failing to join, any such association.
- 3.4 Workers should be made aware of the conditions of their employment or engagement from the start. Workers must be made aware of the terms of their employment, the wages that they must be paid, the hours that they must work, and any overtime or other conditions of their employment.

- provisions. Workers maternity / paternity a minimum.
- 3.5 The Company does not impose any physical punishment, harassment in any form, or bullying in a
- 4. Environmental Issues**
- 4.1 The Company is aware of the environmental impact of its activities to a minimum. To help achieve this a number of Environmental Policy are available from <<e.g. relevant offices >>.
- 4.2 As an absolute minimum the Company ensures that it meets all applicable environmental laws and regulations it may be operating.
- 5. Conflicts of Interest**
- 5.1 The Company holds no interest in those with whom it has a business relationship of interest potential partners.
- 5.2 In order to help preserve these relationships the Company has developed a Corporate Hospitality Policy, which provide rules and guidelines concerning officers and employees aimed at minimising the potential conflict of interest and at avoiding risks associated with bribery. Copies of the Corporate Hospitality and Gifts Policy are available from the relevant officer or URL >>.
- 5.3 All officers, employees and partners of the Company are expected to act honestly and with integrity.
- 6. Information and Confidentiality**
- 6.1 Information received from suppliers or agents of the Company will not be used for any purpose beyond that for which it was provided.
- 6.2 The Company will process personal data collected in accordance with its Data Protection Policy.
- 7. [Shareholders and Investors]**
- The Company, its officers, directors and representatives are committed to ensuring that no act or omission which would have the effect of prejudicing the interests of the shareholders, creditors or other investors in the Company or its subsidiaries.
- 8. Suppliers and Partners**
- 8.1 The Company expects its suppliers and partners to work towards and uphold similar ethical and environmental standards.

8.2 The Company will maintain a record of potential new suppliers before entering into a contract. The Company reserves the right to request information regarding the production and sources of goods supplied.

8.3 The Company reserves the right to terminate any agreement or other arrangement with a supplier who is found to have acted in contravention of the Company's Ethical Policy.

## 9. Bribery and Corruption

9.1 The Company is forbidden from any acts of bribery and to the making of facilitation payments contrary to the Bribery Act 2010.

9.2 Employees and any persons associated with the Company such as agents, subsidiaries and joint ventures are not permitted to either offer or receive any type of payment.

9.3 All employees are encouraged to report any suspicion of corruption or bribery within the Company using the Whistleblowing Policy available from <<e.g. relevant internal channels>>.

9.4 In the event that a suspected instance of bribery, the Company will proceed in accordance with its Data Protection Policy. Data will be held securely and accessed by, and disclosed to, individuals in accordance with the rules of dealing with the report of bribery.

9.5 Should any employee be in doubt when receiving or issuing gifts and hospitality, they should refer to the Gift and Hospitality Policy available from <<e.g. relevant internal channels>>.

9.6 The Company uses the guidance published, from time to time, by the Secretary of State in connection with section 9 of the Bribery Act 2010.

9.7 If an employee or person associated with the Company is found guilty of giving or receiving a bribe, he/she will be held liable and may be subject to disciplinary action.

9.8 Anyone found guilty of bribery will be responsible for bearing any related remedial costs such as legal fees and fines.

**This policy has been approved & signed by:**

**Name:** <<Insert Name>>

**Position:** <<Insert Position, e.g. Resources Manager>>

**Date:** <<Date>>

**Signature:**

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