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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 basic freedoms 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 directly involved in the Company's business.
- 1.5 This policy is non-exhaustive and should be considered in conjunction with the other policies of the Company's business.

## 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 its employees, agents and contractors are entitled to their human rights as set out in the Universal Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.
- 2.3 The Company will not enter into any business arrangement with any person, company or organisation that would violate 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 highest standards of legislation as the minimum 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 to be paid, the hours that they must work, the safety and health measures for their protection and any overtime

- provisions. Workers must be granted such annual leave, sick leave, maternity / paternity leave as is granted by legislation as 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 and will help achieve this and help the environment <<e.g. relevant official documents>>. Environmental Policy are available from the website.
- 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 relationship of interest potential conflict of interest 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 Policy and Gifts Policy are available from the relevant officer or URL >>.
- 5.3 All officers, employees and suppliers 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 ensure that it complies with all applicable requirements of the Data Protection Regulation. "Data Protection Legislation" means (1) unless otherwise stated, the Data Protection Regulation (Regulation (EU) 2016/679) ("GDPR") which is directly applicable in the UK, the GDPR and any national legislation implementing the GDPR, and any national legislation (as amended from time to time) in the UK and subsequently (2) any legislation which supersedes or supplements the GDPR.
- 7. [Shareholders and Investors]**
- The Company, its officers, directors and employees 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 of

## 8. Suppliers and Partners

- 8.1 The Company expects its Suppliers and Partners to work towards and uphold similar ethical and moral standards.
- 8.2 The Company will conduct due diligence on the record of potential new suppliers before entering into a contract. However, the Company reserves the right to request information from its Suppliers regarding the production and sources of goods supplied.
- 8.3 The Company reserves the right to terminate any arrangement with a Supplier in the event of a contravention of the Company's Ethical Policy.

## 9. Bribery and Corruption

- 9.1 The Company is fully committed to the prevention of any acts of bribery and to the making of facilitation payments prohibited by the Bribery Act 2010.
- 9.2 Employees and any other persons associated with the Company such as agents, subsidiaries and joint ventures are not permitted to either offer or receive any type of facilitation payment.
- 9.3 All employees are encouraged to report any suspicion of corruption or bribery to the Company in accordance with the Whistleblowing Policy available from <<e.g. relevant internal channels>>.
- 9.4 Should any employee be in doubt when receiving or offering gifts and hospitality, they should refer to the Gift and Hospitality Policy available from <<e.g. relevant internal channels>>.
- 9.5 The Company uses the guidance published by the Secretary of State in favour of implementing the guidance published, from time to time, by the Secretary of State in relation to section 9 of the Bribery Act 2010.
- 9.6 If an employee or other 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.
- 9.7 Anyone found guilty of bribery or corruption 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. Human Resources Manager>>

Date: <<Date>>

Signature:

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