

Code of Business Ethics

General statement

This Code of Business Ethics sets out the standards we expect from our employees in their internal and external dealings with colleagues, customers and third parties.

Basic Standards of Conduct

We will conduct every aspect of our business with honesty, integrity, and openness, respecting human rights and the interests of our employees, customers and third parties.

We will respect the legitimate interests of third parties with whom we have dealings during our business.

We will maintain the highest standards of integrity - for example, we will not promise more than we can reasonably deliver or make commitments we cannot or do not intend to keep.

Employees

We are committed to:

- developing a workforce where there is mutual trust and respect, free from bullying and harassment, where every person feels responsible for the performance and reputation of our company.
- respecting the rights of individuals their customs and traditions and their right to freedom of association. We will negotiate in good faith with properly elected representatives of our employees.
- recruiting, employing, and promoting employees based on objective criteria and the qualifications and abilities needed for the job to be performed.
- maintaining good communications with employees through our information and consultation procedures.
- providing our employees with suitable training and assisting them in realising their potential.
- ensuring the privacy and confidentiality of our employees' personal information is respected.
- suitably rewarding our employees for their contribution to the success of the business.
- providing mechanisms whereby employees can raise legitimate concerns confidentially regarding malpractice and ensuring no one will be victimised for a report made in good faith.
- providing employees with the appropriate information and training to comply with this Code and the associated policies; and seeking to protect our employees from third party abuse that might be injurious to their safety, health, or well-being.

Business Integrity

We aim to develop strong relationships with our suppliers and others with whom we have dealings, based on mutual trust, understanding and respect.

In those dealings, we expect those with whom we do business to adhere to business principles consistent with our own.

We will conduct our operations in accordance with the principles of fair competition and applicable regulations.

The business's accounting and other records and supporting documents must accurately describe and reflect the nature of the underlying transactions.

No unrecorded account, fund or asset will be established or maintained.

We will comply with the laws and regulations applicable wherever we do business. We will obtain legal advice where felt necessary to comply with this commitment.

We will review and track our business risks including social and environmental risks.

The business will not facilitate, support, tolerate or condone any form of money laundering.

National and International Trade

We will seek to compete fairly and ethically within the framework of applicable competition and anti-trust laws, and we will not prevent others from competing fairly with us.

We will comply with all applicable export control laws and sanctions when conducting business around the world.

Personal Conduct

All employees are expected to behave in accordance with the principles set out in this Code of Business Ethics.

Employees are expected to protect and not misuse company assets such as buildings, vehicles, equipment, cash, and procurement cards.

Employees are expected to use e-mail, internet, IT and telephones in a manner appropriate for business purposes in line with the principles contained in this Code and any applicable IT policies.

Bribery

No Business First employee or individual or business working on our behalf must accept or give a bribe, facilitation payment or other improper payment for any reason.

This applies to transactions with government officials, any private company or person anywhere in the world. It also applies whether the payment is made or received directly or through a third party.

The business shall ensure that adequate procedures are in place to prevent the risk of bribery and that these are effectively communicated and implemented across the business in line with the requirements of the Bribery Act 2010 and as set out in the Anti-Bribery Policy.

Gifts, Entertainment, and Improper Payments

Accepting or giving any entertainment or gift that is designed to, or may be seen to influence business decisions, is not acceptable. No company or employee shall offer, give, seek or receive, either directly or indirectly, inducements or other improper advantages for business or financial gain. If an employee is in any doubt as to whether he or she may accept an offer, that employee should discuss the issue with his or her manager or the Ethics and Compliance Officer

Any gift or hospitality given or received by an employee should be reported to the Ethics and Compliance Officer. This applies to any gift or hospitality with an estimated or actual value of £50 or more.

Conflicts of Interest

Whilst we respect the privacy of our employees, all employees are expected to avoid personal relations, activities and financial interests which could conflict with their responsibilities to the business.

Employees and consultants must not seek gain for themselves or others through misuse of their positions or company property.

All actual and potential conflicts (including those arising from the activities or interests of close relatives or partners) should be disclosed to and discussed with an employee's line manager.

Confidentiality

Information received by anyone in the course of his or her employment must not be used for personal gain or for any purpose other than that for which it was given.

Where confidential information is obtained during business that confidentiality must be respected.

Health and Safety

We are committed to creating and maintaining a safe and healthy working environment for our employees, customers, and the community.

We strive to avoid emergency situations but recognise the need to be prepared. We are committed to having effective emergency response procedures in place.

The Environment

All employees are expected to adhere to the requirements of the local environmental management system and support the improvement in our environmental performance.

Customers

Business First is committed to providing value for money, high quality, consistent, accessible, and reliable services to its customers.

All employees are expected to behave respectfully and honestly in all their dealings with customers and the public in accordance with the principles set out in this Code.

Supply Chain

We purchase a wide range of goods and services required in the operation of our business and we also rely heavily on several key suppliers for the delivery of our core services. Good working relationships with our suppliers are therefore central to the success of our business.

Whilst we are committed to obtaining and retaining competitive goods and services, we will at the same time seek to ensure they are from sources that have not jeopardised human rights, safety or the environment.

We expect our suppliers to adhere to business principles consistent with our own. We expect them to adopt and implement acceptable safety, environmental, product quality, product stewardship, labour, human rights, social and legal standards.

We will seek to work with our suppliers to develop long-term meaningful relationships to benefit both parties with the aim of improving the quality, environmental performance and sustainability of goods and services.

Anti-Bribery

Business First Anti-Bribery Policy:
covering the giving and acceptance of bribes.

Introduction

Business First values its reputation for ethical behaviour and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Its aim therefore is to limit its exposure to bribery by:

- Setting out a clear anti-bribery policy.
- Training all employees so that they can recognise and avoid the use of bribery by themselves and others.
- Encouraging its employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately.
- Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution.
- Taking firm and vigorous action against any individual(s) involved in bribery.

The Policy

Business First prohibits:

the offering, the giving, the solicitation, or the acceptance of any bribe, whether cash or other inducement

to or from

any person or company, wherever they are situated and whether they are a public official or body or private person or company.

by

any individual employee, agent or other person or body acting on Business First's behalf

in order to

gain any commercial, contractual or regulatory advantage for the business in a way which is unethical.

or in order to

gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual

Further Clarification

This policy prohibits any inducement which results in a personal gain or advantage to the recipient, or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of the Group or of the person or body employing them or whom they represent.

This policy is not meant to prohibit the following practices providing they are proportionate and are properly recorded:

- normal and appropriate hospitality
- the giving of a ceremonial gift on a festival or at another special time
- the use of any recognised fast-track process which is available to all on payment of a fee
- the offer of resources to assist the person or body to make the decision more efficiently provided that they are supplied for that purpose only.

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to the Ethics and Compliance Officer before proceeding. If necessary, guidance should also be sought from the Company Director.

Employee Responsibility

The prevention, detection and reporting of bribery is the responsibility of all employees throughout the business. Suitable channels of communication by which employees or others can report confidentially any suspicion of bribery will be maintained via the usual chain of command.