



# Code of Responsible Business Conduct

Version 3

Date: Tuesday 19th March 2024



# Code of Responsible Business Conduct

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- Keeping Everyone Healthy and Safe
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# Code of Responsible Business Conduct

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Protecting Our Environment

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# Code of Responsible Business Conduct

## Introduction

### Our code brings together three things to keep us safe:

1. At the heart of our code is the simple principle that we always follow the law. The trust of our clients and other stakeholders depends on our reputation as a law-abiding business.

2. To make sure we follow the law, we have developed nine ways of working, supported by our company policies, to provide us with a protective layer of information, guidance, and support to ensure that we know how the rules apply to us.

3. Beyond the law and our ways of working, we must always be guided by Wingfield Consultants Ltd's values. These can guide us when we make difficult decisions.

### Our values:



Follow the law



Nine ways of working



Values

- We **passionately** believe that clients, customers, and consumers deserve the best experience.

- We take **pride** in everything we do to help deliver growth and profitability.

- We want to make a difference to the **planet** by providing sustainable solutions.

- We want to empower **people** with the support we provide.

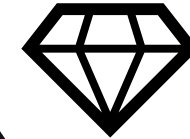
- We will help unleash the potential of brands and **products** for our clients to help them succeed.

### The law

We must always follow the law – it sits at the heart of client and stakeholder trust in us.

### Our ways of working

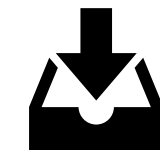
These provide a protective layer of information, guidance, and support to ensure we don't break the law



Our values



The law



Our ways of working

Our Code of Responsible Conduct sets out our minimum expectations for all colleagues.

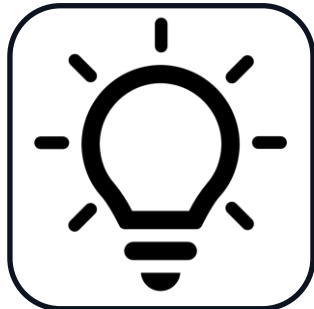
# Code of Responsible Business Conduct

## Introduction (cont.)

A company's success is often measured in financial terms, that is, how much it grows and how profitable it is. While these indicators are necessary, they can never describe the full story. A company clearly needs to perform well in other dimensions. It has to create satisfied clients and customers, it needs to be obey the law, it should create value for the wider community and, of course, it needs to create a sense of community amongst its employees. How we do things at Wingfield Consultants Ltd will determine how proud we feel about the company we work for.

How we behave as individuals really matters, not only in terms of the direct results of our actions but also because our behaviour influences others around us – we all collectively contribute to the Wingfield Consultants culture. We all want a positive culture that makes us successful financially **and** ensures we operate in the right way. This code of responsible conduct is an important pillar for our culture.

**There are two distinct types of situation we should consider:**



### **When the situation is clear:**

Examples would be compliance with employment law, or following our safety procedures. Our responsibility as individuals is to understand the rules and procedures that we should follow and to live up to that standard at all times. As an employee you can access to the right information and that we are following up on areas where we need to improve. We all need to contribute to making our rules and procedures 'real' – sensibly designed and practical so that we can rightly expect everyone to adhere to them.



### **When the situation is less clear:**

An example would be a supplier inviting you out for a meal – should you accept or decline? Here we are relying on guidelines rather than strict rules and we expect our employees to make practical judgements considering the actual situation.

As employees of Wingfield Consultants Ltd, we have a responsibility to create a company we can be proud of.

# Code of Responsible Business Conduct

## Introduction (cont.)

We can help shape these judgements by listing examples with recommendations, but we cannot list every real-life scenario. We are relying on all our colleague and stakeholders to build up a collective sense of behaviours, and ultimately values, that we will apply to all situations. The code encourages you to talk to others in these cases which is important to make the right judgement in each situation and equally importantly it will help share a common 'Wingfield Consultants way' of doing things right.



There have been many high-profile failure of individual and collective conduct in some notable companies around the world. The penalties in terms of company reputation and financial penalties can be enormous. This is a serious subject, and we must get it right. However, in addition to following the rules and guidelines to protect the company reputation, if we also adopt the behaviours and values that this code outlines, we can ensure a vibrant and positive culture that will make us successful in all senses of the word.

As employees of Wingfield Consultants Ltd, we have a responsibility to create a company we can be proud of.

# Code of Responsible Business Conduct

## Our Nine Ways of Working

| Our Nine Ways of Working  |  |  |
|---|--|--|
| Keeping Everyone Healthy and Safe<br><br>1 | Supporting Employees' Rights and Diversity<br><br>2 | Maintaining Ethical and Honest Behaviour<br><br>3 |

| Our Nine Ways of Working   |   |   |
|--|---|---|
| Staying Free From Bribery and Corruption<br><br>4 | Keeping Our Communications Open and Responsible<br><br>5 | Delivering Excellent Customer Service<br><br>6 |

| Our Nine Ways of Working  |  |  |
|---|--|--|
| Working Within the Community<br><br>7 | Protecting Our Environment<br><br>8 | Standing Up For What's Right<br><br>9 |

# Code of Responsible Business Conduct

## Keeping Everyone Healthy and Safe



1

### What we stand for

We believe that neither employees, clients, or any other person should be harmed as a result of the work we do or services we provide. We are strongly committed to achieving an incident-free environment. We always make sure we have the right health and safety standards and procedures in place, along with the right tools and equipment.

We understand that safety is the responsibility of everyone. We make sure all employees (and third parties) are properly trained and feel confident to challenge and report unsafe practices.

We actively monitor the effects our work might have on our health, and ensure that everyone on our team is fit and healthy to do their job competently and responsibly.

We constantly seek to eliminate the causes of accidents and risks, learning from each incident so that it can never happen again



What we stand for



What we stand for



What we stand for

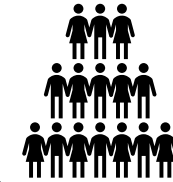
### Why is it important

We care about people. In our business carelessness, lack of planning and lack of leadership can result in accidents.

Health and safety is at the heart of who we are and how we work. If we fail to implement the right procedures or maintain exacting standards of care for our people, clients, or any other person, we put others at risk.

### Further Information

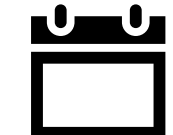
- Health, Safety, and Wellbeing Policy
- Our Wellbeing Foundations
- Sustainability Policy



Why is it important



Why is it important



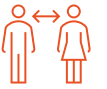
Further Information

We believe no one should be harmed as a result of any work we do - so everyone stays safe and well.



# Code of Responsible Business Conduct

## Supporting Employees' Rights and Diversity



2

### What we stand for

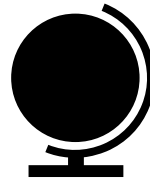
We are committed to being a diverse and inclusive place to work, reflecting the world in which we operate.

We work together to create an environment where we all have equal opportunities to achieve our full potential, talent is recognised and developed, and we're encouraged to deliver exceptional performance.

We believe in treating everyone with fairness, encouragement, and respect.

We won't tolerate any behaviour or attitudes that discriminate against anyone, or coerce, intimidate, bully, or harass others, or threaten them with verbal or physical violence, and we encourage people to speak up whenever we see such things happening.

We support every individual's human rights and refuse the use of child labour and forced labour under any circumstances.



What we stand for



What we stand for



What we stand for

### Why is it important

How we treat each other is fundamental to who we are and what we want to be as a business.

Abuse, exploitation, slavery, and discrimination are opposed to all that we value and wish to uphold wherever we work in the world.

Where all our people can flourish equally, we know we will flourish. Making the best use of our talent will benefit our business, people, and society.

### Further Information

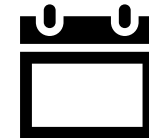
- Human Resources Policy
- Our Inclusion Commitments
- Modern Slavery and Human Trafficking Statement



Why is it important



Why is it important

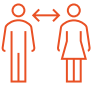


Further Information

We value, support, and protect the rights and dignity of the individual and the diversity of our people – so we are all treated with respect

# Code of Responsible Business Conduct

## Supporting Employees' Rights and Diversity (cont.)



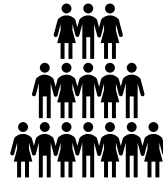
2

### What we stand for

We ensure that no employee is discriminated against due to their gender, race, religion, national origin, sexual preference, or gender identity.

We expect all of our colleagues and those working on our behalf to comply with the law and act ethically and with integrity at all times.

The modern slavery and human trafficking statement sets out the steps we have taken, and continue to take, to ensure that modern slavery and human trafficking are not taking place in our business or any part of our business relationships and projects.



What we stand for



What we stand for



What we stand for

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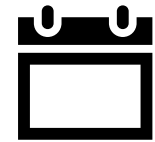
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Why is it important



Why is it important



Further Information

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# Code of Responsible Business Conduct

## Maintaining Ethical and Honest Behaviour



3

### What we stand for

We believe our responsibility is greater than simply complying with the law.

We believe in establishing enduring and equal relationships with our stakeholders, because we are confident that good ethics leads to good business.

We always set out to act in our clients' interests, to the highest standards of excellence, never gaining advantage through dishonest or uncompetitive means.

We depend on the skills, excellence, and goodwill of those who work with us.

We make sure their standards and practices are consistent with ours.

We never seek to bully or cheat our contractors or suppliers, and ensure they are fully, fairly, and promptly paid for their services.



What we stand for



What we stand for



What we stand for

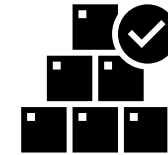
### Why is it important

Our reputation for integrity is perhaps the most valuable business asset. If we lose integrity through dishonesty or because we're discovered trying to do something that's underhand, unfair, or unethical, we also lose our customers' trust and those who work with us.

Just one act of dishonesty, and sometimes even the suspicion of it, can destroy or credibility, our income, our working relationships – and our future.

### Further Information

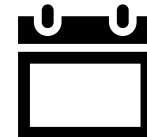
- Competition Law Compliance Policy
- Procurement Policy
- Supply Chain Code of Conduct
- Tax Strategy
- Modern Slavery and Human Trafficking Statement



Why is it important



Why is it important



Further Information

We are always honest, act with integrity, and comply with the law – so everyone trusts us.

# Code of Responsible Business Conduct

## Maintaining Ethical and Honest Behaviour (cont.)



3

### What we stand for

We are transparent in all our dealing with government and regulators, fulfilling our obligations honestly and promptly.

We educate and train our employees to ensure compliance with the law, including government rules and regulations.

We pay our fair share of tax and never engage in tax evasion.

We have the same expectations of legality, ethics, and integrity with our stakeholders. Our goal is that by working together, we can build a sustainable business relationship for both parties.

We outline our expectations for our stakeholder conduct regarding labour and human rights, health and safety, environmental protection, ethics, and management practices in our supply chain code of conduct.



What we stand for



What we stand for



What we stand for

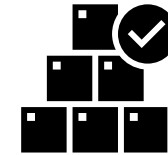
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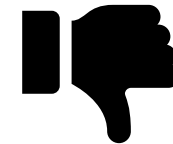
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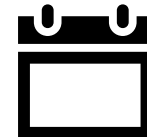
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Why is it important



Why is it important



Further Information

We are always honest, act with integrity, and comply with the law – so everyone trusts us.

# Code of Responsible Business Conduct

## Staying Free From Bribery and Corruption



4

### What we stand for

We believe I always doing our business legally and ethically. So, we never accept bribes, or participate in any kind of fraudulent or corrupt practice, even when not to do so would clearly result in commercial loss.

We avoid political donations and giving or receiving money, gifts, or favours that could influence someone's decision or be open to misinterpretation. We understand that offering or accepting proportionate hospitalities is fine.

We win clients and projects fairly – even if others play unfair.

Our principle is to respect the traditions and cultures of the countries and communities in which we work, always applying the highest ethical standards and rejecting illegal activities.

Payments to public officials to carry out or speed up a process ('facilitation payments') are prohibited.



What we stand for



What we stand for



What we stand for

### Why is it important

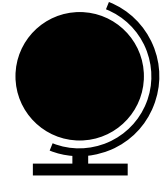
We are strongly committed to enhancing ethical practices worldwide.

Even if a bribe might be 'customary' and help obtain or retain a contract, any corrupt activity could seriously damage our business and our reputation.

The legal consequences of non-compliance, including large penalties and/or imprisonment, are too high to be ignored.

### Further Information

- Anti-Bribery and Anti-Fraud Policy
- Competition Law Compliance Policy
- Procurement Policy
- Supply Chain Code of Conduct



Why is it important



Why is it important



Further Information

We always make sure we are free from bribery and corruption – so people know our decisions are made for the right reasons.

# Code of Responsible Business Conduct

## Staying Free From Bribery and Corruption (cont.)



4

### What we stand for

We will not penalise anyone for refusing to pay a bribe, make a facilitation payment, or engage in any form of fraudulent or corrupt activity, even if the refusal results in a loss of business for us.

We believe prevention is better than cure and have the right procedures in place.

We expect our stakeholders to comply with the law and act ethically and with integrity at all times. Our goal is that by working together, we can build a sustainable business relationship for all parties.

We outline our expectations for our stakeholder conduct regarding labour and human rights, health and safety, environmental protection, ethics, and management practices in our supply chain code of conduct.



What we stand for



What we stand for



What we stand for

### Why is it important

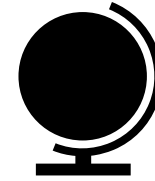
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### Further Information

- Anti-Bribery and Anti-Fraud Policy
- Competition Law Compliance Policy
- Procurement Policy
- Supply Chain Code of Conduct



Why is it important



Why is it important



Further Information

We always make sure we are free from bribery and corruption – so people know our decisions are made for the right reasons.

# Code of Responsible Business Conduct

## Keeping Our Communications Open and Responsible



5

### What we stand for

We don't hide information others should know; we don't disclose information we shouldn't. We're clear and honest about our services, processes, policies, and achievements. So:

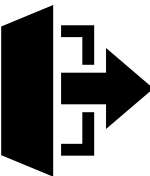
- we tell people what they need to know in good time
- we always try to inform; we never try to mislead
- we make sure what we say is accurate, appropriate, clearly stated, and clearly understood
- we listen
- we keep trying to get better.



What we stand for



What we stand for



What we stand for

### Why is it important

Clear two-way communication is at the heart of great teamwork and successful projects.

Information that's unclear or misleading, not given when it should be – or given when it shouldn't – can obstruct progress and is potentially dangerous.

We need our stakeholders to trust us. What we say about ourselves and them, how we say it and when we say it, has a vital role in creating or destroying that trust.

### Further Information

- Information Policy
- Whistleblowing Policy
- Privacy Policy



Why is it important



Why is it important



Further Information

We communicated openly, honestly, clearly, and responsibly.

# Code of Responsible Business Conduct



## Keeping Our Communications Open and Responsible (cont.)

5

### What we stand for

We want our customers to know that we keep any confidential information or data we have about them safe and secure.

We don't try to get information about our competitors through any unlawful or dishonest means.

We want our employees to feel respected and to respect us.



What we stand for



What we stand for



What we stand for

### Why is it important

Clear two-way communication is at the heart of great teamwork and successful projects.

Information that's unclear or misleading, not given when it should be – or given when it shouldn't – can obstruct progress and is potentially dangerous.

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Why is it important



Why is it important



Further Information

### Further Information

- Information Policy
- Whistleblowing Policy
- Privacy Policy

We communicated openly, honestly, clearly, and responsibly.



# Code of Responsible Business Conduct

## Delivering Excellent Customer Service



6

### What we stand for

We expect our stakeholders to comply with the law and act ethically and with integrity at all times. We outline our expectations for our supply chain regarding labour and human rights, health and safety, environmental protection, ethics and management practices in our supply chain code of conduct.

We treat our stakeholders and suppliers fairly and ensure we build constructive relationships with them, and they understand our ways of working and the standards we operate by.

We want our clients to trust and value the services we provide them, meeting and exceeding their expectations every time we deal with them.



What we stand for



What we stand for



What we stand for

### Why is it important

Clients have choice and access that helps them choose. Our services must be consistently excellent in order to give clients confidence in the service we provide.

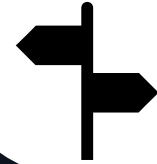
We aim to give clients positive experiences and leave them feeling valued. If we do this, we will delight our clients and they will recommend us to others.

Building strong relationships with our suppliers will enable us to obtain the best quality, service, and quality.

We want to work with suppliers who understand us and adhere to our ways of working.

### Further Information

- Quality and Continuous Improvement Policy
- Supply Chain Code of Conduct



Why is it important



Why is it important



Further Information

We work to meet our client's needs and exceed their expectations – so they work with us again and again.

# Code of Responsible Business Conduct

## Delivering Excellent Customer Service (cont.)



6

### What we stand for

We go the extra mile to ensure the services we offer are consistently excellent, reliable, and appropriate.

We do our utmost to make it easy for our clients to contact us, dealing speedily, efficiently, and courteously with their enquiries and concerns.

We do our utmost to be honest and open and taking personal ownership for solving their problems.



What we stand for



What we stand for



What we stand for

### Why is it important

Clients have choice and access that helps them choose. Our services must be consistently excellent in order to give clients confidence in the service we provide.

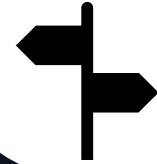
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### Further Information

- Quality and Continuous Improvement Policy
- Supply Chain Code of Conduct



Why is it important



Why is it important



Further Information

We work to meet our client's needs and exceed their expectations – so they work with us again and again.

# Code of Responsible Business Conduct

## Working Within the Community



7

### What we stand for

We seek to play a positive and beneficial role in our community through charitable partnerships and by encouraging our employees to participate in community events.

We predominantly support the following local causes:

- Norfolk Community Foundation
- Norfolk ProHelp
- New Anglia Youth Pledge



What we stand for



What we stand for



What we stand for

### Why is it important

We believe in supporting local charitable and training organisations to make a positive impact to the community and individuals.

### Further Information

- Norfolk Community Foundation  
[Norfolk Community Foundation | Together, Norfolk shines brighter \(norfolkfoundation.com\)](http://norfolkfoundation.com)
- Norfolk Pro Help  
[Norfolk ProHelp | Norfolk Community Foundation \(norfolkfoundation.com\)](http://norfolkfoundation.com)
- New Anglia Youth Pledge  
[Youth Pledge - New Anglia](http://norfolkfoundation.com)



Why is it important



Why is it important



Further Information

We act responsibly and respectfully towards the communities we work in – because we are part of them.

# Code of Responsible Business Conduct

## Protecting Our Environment



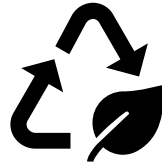
8

### What we stand for

We want to protect and improve our environment for the future. We choose to set environmental standards that require us to go beyond the minimum legal standards and we'll continue to raise the bar for the future.

We make sure our suppliers have consistent environmental standards and controls.

We make improving our environmental impact a core part of what we do by building it into projects we undertake.



What we stand for



What we stand for



What we stand for

### Why is it important

Acting responsibly and sensitively towards the environment and taking environmental issues seriously is key to how we are judged as a business.

Our clients and stakeholders ultimately hold us to account for our environmental performance.

### Further Information

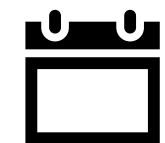
- Sustainability Policy
- Supply Chain Code of Conduct



Why is it important



Why is it important



Further Information

We respect and protect the environment and aim to have a positive impact on it – so we safeguard the future.

# Code of Responsible Business Conduct

## Standing Up For What's Right



9

### Our ways of working

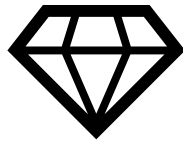
Our ways of working are there to challenge us and ensure we work to the standards we set ourselves as a company. They are also there to protect us and create an environment in which fairness, integrity, and respect are the norm.

It's the job of each of us to make sure that's how it stays. We all play a part in keeping our values and ways of working alive and relevant in our day-to-day activities. Sometimes this will mean facing difficult situations when we must stand up and challenge behaviour, or practices we think our wrong.

When this happens, it is important for all of us to know that we will always be supported by the company. It can take courage to speak up for what is right. We want everyone to know what we stand behind those who find that courage.



What we stand for



What we stand for



What we stand for

### What to do

We provide a clear and confidential process for people to report their concerns:

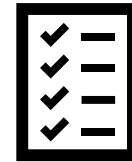
- Try to speak up at the earliest opportunity, ideally to your line management.

- If you feel you can't do this, think about contacting one of your senior managers or the executives named in the Whistleblowing Policy.

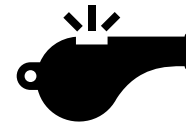
- If you don't feel comfortable talking to anyone at work, you can use a confidential reporting line operated by Safecall (0800 9151571), a completely independent company that specialises in handling concerns at work. They'll take details of your concern and send a report to Wingfield Consultants Ltd.

### Further Information

- Whistleblowing Policy



Why is it important



Why is it important



Further Information

We always speak up when we believe our ways of working are being undermined – so we uphold our ways of working together.

# Code of Responsible Business Conduct

## Standing Up For What's Right (cont.)



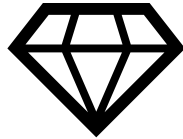
9

### Our ways of working

As a company, Wingfield Consultants promises to safeguard all those who defend our principles and ensure no retaliation is taken against them. All we ask is that your concern is genuine. We treat all concerns seriously, conducting investigations and taking appropriate actions. Engaging in illegal activities or undermining our principles may result in disciplinary or corrective actions, up to and including dismissal.



What we stand for



What we stand for



What we stand for

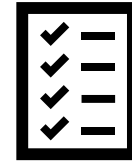
### What to do

We provide a clear and confidential process for people to report their concerns:

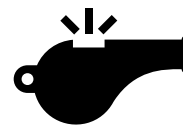
- Try to speak up at the earliest opportunity, ideally to your line management.
- If you feel you can't do this, think about contacting one of your senior managers or the executives named in the Whistleblowing Policy.
- If you don't feel comfortable talking to anyone at work, you can use a confidential reporting line operated by Safecall (0800 9151571), a completely independent company that specialises in handling concerns at work. They'll take details of your concern and send a report to Wingfield Consultants Ltd.

### Further Information

- Whistleblowing Policy



Why is it important



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Further Information

# Code of Responsible Business Conduct

## Last Thoughts

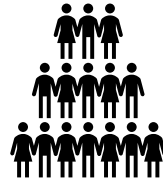
Each of us also plays an important role in helping one another to find the right answer.

This is especially true of our leaders and senior managers.

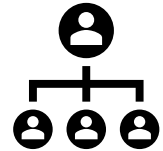
We need people who will lead by example, who are a role model for others, who act and decide according to our principles, so we know we can go to them when we need advice.

There's always someone to help. If you're not sure what to do, just ask your manager, your local Ethics and Compliance Manager, or a colleague. Or phone Safecall.

If you need additional support or advice, there are more resources to help guide you to the right decisions. You can find the details of all the Wingfield Consultants Ltd's policies on [www.wingfieldconsultants.co.uk](http://www.wingfieldconsultants.co.uk).



What we stand for



What we stand for

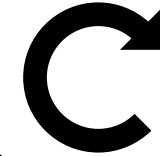


What we stand for

New challenges and issues emerge all the time, so now and again we'll be updating our way of working to keep them relevant and we welcome everyone's input to help make each new version better than the last.

Remember – we all hold our company in our hands. What we do, or fail to do, defines the environment we work in and can enhance or destroy the reputation of Wingfield Consultants Ltd.

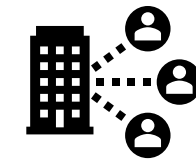
Thank you for using your judgement to help us follow these ways in working in all that we do.



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Further Information

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THANK YOU!

