



ETHICS, BUSINESS INTEGRITY AND LABOUR STANDARDS POLICY

Policy Statement

Aspect Healthcare is committed to the practice of responsible and ethical corporate behaviour. Through our business practices we also seek to protect and promote the human rights and basic freedoms of all employees and agents. Further we are committed to protecting the rights of all of those whose work contributes to our success, including our suppliers and clients.

Scope & Responsibilities

All employees, contractors, consultants, agency workers and anyone else acting on behalf of the company is required to comply with this policy when dealing with job applicants, clients (prospective or current), suppliers, partners and anyone else with whom they come into contact during the course of their employment or engagement.

Disciplinary action may be taken against any employee who acts in breach of this policy. Disciplinary action may include summary dismissal in the case of a serious breach or repeated breaches. In other cases, it may include a verbal or written warning, or other remedial action which may include training. Such action will be taken in accordance with the Company's disciplinary procedure.

Consultants, contractors and agency workers acting on behalf of the company who breach this policy may be subject to having their contract/assignment suspended pending investigation or terminated with immediate effect.

Human Rights & Modern Slavery

The term slavery is often associated with the 18th and 19th centuries; however the practice still continues today in one form or another in every country in the world and is becoming significantly more prevalent in the UK.

The Modern Slavery Act 2015 consolidates slavery and trafficking offenses and introduces tougher penalties and sentencing rules. It ensures that the police and law enforcement agencies have the powers they need to pursue, disrupt and bring to justice those engaged in human trafficking and slavery, servitude and forced or compulsory labour. It also introduces measures to enhance the protection of victims of slavery and trafficking.

We oppose all forms of slavery and trafficking and are fully committed to compliance with the Modern Slavery Act 2015 as well as the ILE/UN Guiding Principles.

We have a Modern Slavery Policy that covers staff, suppliers, business partners, consultants, contractors and agency workers, ensuring everyone understands what modern slavery is, how to recognise the common signs of it, actions to reduce the risk of modern slavery in the workforce and supply chain and how to report it. Staff involved in procurement are instructed on how to conduct due diligence to ensure our supply chains for core products and services also remain slavery free. We will not enter into any business arrangement with any person, company or organisation which fails to uphold the human rights of its workers or who breaches the human rights of those affected by their activities.

Our policy is in alignment with the Stronger Together good practice guidance to help us deter, detect and deal appropriately with forced labour, labour trafficking and other hidden labour exploitation.

ETI Base Code & Employee Rights

The ETI Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of good labour practice. We comply fully with the ETI Base Code including the April 2014 amendment:

1. Employment is freely chosen. There is no forced, bonded or involuntary prison labour and workers are not required to lodge “deposits” of their ID papers with us or our clients and are free to leave after reasonable notice.
2. No employee will be prevented from joining or forming a staff association or trade union, nor will any employee suffer any detriment as a result of joining, or failing to join, any such organisation. Representatives will not be discriminated against and will have access to carry out their functions in the workplace.
3. Working conditions are safe and hygienic and adequate provisions are taken to prevent accidents and injuries to health by minimising hazards in the workplace. In line with our Health & Safety Policy, all employees will receive health & safety induction training.
4. Child labour will not be used and we will not knowingly engage with organisations that use child labour.
5. As a minimum we pay the living wage to all employees and they will receive a written contract detailing their employment conditions. Employees will be made aware of the terms and conditions of their employment or engagement from the outset. In particular employees must be made aware of the wage that they receive, when and how it is to be paid, the hours that they must work and any legal limit which exists for their protection and any overtime provisions. Employees must also be allowed such annual leave, sick leave, maternity / paternity leave and such other leave as is granted by legislation as a minimum. Deductions from wages as a disciplinary measure is prohibited and all disciplinary action will be recorded.
6. Working hours will not be excessive and contracted hours shall not exceed 48 hours per week unless the employee has opted out of the working time regulations. Overtime is voluntary and the total hours worked in a week shall not exceed 60 unless exceptional circumstances apply.
7. In line with our Equality, Diversity & Inclusion Policy, we do not discriminate in hiring, compensation, access to training, promotion, termination or retirement based on any protected characteristic as identified in the Equality Act 2010. All employees must be treated equally. Employees with the same experience and qualifications should receive equal pay for equal work.
8. To every extent possible regular employment will be provided.
9. No harsh or inhumane treatment is allowed including physical abuse or discipline, sexual abuse or the threat of such abuse or intimidation.

Sustainability & Environmental Issues

We are committed to operating the business in an environmentally sensitive way with proper regard to our legal obligations and according to relevant directives, regulations and codes of practice. We recognise that our operations have an effect on the local, regional and global environment. In light of this, we are committed to continuous improvements in environmental performance, particularly in relation to reduction in energy usage, sustainable waste management, recycling, and prevention of pollution.

Whilst we do not produce any emissions or pollutants that come under the Integrated Pollution Prevention and Control Regulations issued by DEFRA, we have identified our most significant environmental impacts, and these underpin the three key principles of our Environmental Policy:

1. Achieving Net Zero Carbon by 2050.

2. Reducing or eliminating waste.
3. Eliminating our environmental harm risk (i.e. the risk of our business causing pollution).

As an SME (defined under the Companies Act 2006), we are not obliged to report energy and carbon information under the SECR framework, however we have methods in place for meeting our environmental objectives including:

- Having in place a robust carbon accounting platform which provides monthly carbon impact information.
- Understanding our sources of emissions, and prioritising them according to size of impact, and ease and pace of mitigation measures.
- Delivering a programme of specific actions, including focus on renewable electricity, reducing business travel and commuting, considering the insulation and energy efficiency of buildings, reducing energy usage, reducing the amount of waste we create, recycling where possible and sustainable procurement.

We have a full environmental policy which details how these impacts will be monitored, managed and wherever possible, reduced.

Conflicts of Interest & Anti-Bribery / Anti-Corruption

We hold the trust and confidence of those with whom we deal, including clients, suppliers and employees as fundamental to our success. Conflicts of interest potentially undermine relationships with our partners. In order to help preserve and strengthen these relationships, we have developed rules and guidelines concerning the conduct of our officers and employees aimed at minimising the possibility of conflicts of interest.

We have an Anti-Bribery and Anti-Corruption Policy and Code of Conduct which detail:

- The definition of bribery and corruption.
- Our approach to reducing and controlling the risks of bribery.
- Rules for accepting gifts, hospitality and donations.
- Rules to prevent conflicts of interest.
- Our reporting and disclosure procedure.

Internal Staff/Employees

We do not prohibit normal and appropriate gifts and hospitality (given or received) to or from third parties, however, employees (internal staff) must understand what is regarded as normal and appropriate in terms of financial limits subject to the principles below, namely that any gift or hospitality:

- Must not be made with the intention of improperly influencing a Third Party (e.g. to obtain, retain or reward business/a business advantage, or in exchange for favours or benefits).
- Must comply with local law in all relevant countries.
- Must be given in the name of the organisation, not in an individual's name.
- Must not include cash or a cash equivalent.
- Must be of an appropriate type and value and given at an appropriate time taking into account the reason for the gift.
- Must be given openly, not secretly.
- In the case of gifts, must not be offered to, or accepted from, government officials or representatives, politicians or political parties, without the prior approval of the HR Manager

It is NOT acceptable for any employee to:

- Give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that they or the company will improperly be given a business advantage, or as a reward for a business advantage already improperly given.
- Give, promise to give, or offer a payment, gift or hospitality to a Government official, agent or representative to facilitate or expedite a routine procedure.
- Accept payment from any third party where it is known or suspected that it is offered or given with the expectation that they will improperly obtain a business advantage.
- Accept a gift or hospitality from a third party where it is known or suspected that it is offered or provided with an expectation that a business advantage will be improperly provided by the company in return.
- Threaten or retaliate against another employee or worker who has refused to commit a bribery offence or who has raised concerns under this policy.
- Engage in any activity that might lead to a breach of this policy.

Any corporate gifts or hospitality irrespective of value (whether being given or received) must be disclosed to and approved by the HR Manager prior to being given/accepted. Details of such gifts including the purpose of the gift, the giver and recipient, the nature of the gift/hospitality, its value and who has approved it must be fully documented in the Gifts/Hospitality Register. This register will then be audited by the Compliance Manager on a quarterly basis.

Corporate gifts are aimed at thanking customers or suppliers for their loyalty and custom and not as an incentive or inducement for future favourable treatment or business.

Promotional gifts without significant value (e.g. stationery, chocolates, or other gifts under the value of £50) need not be disclosed but should be shared with other employees. If it is felt that any gift received might constitute an act of bribery, then the gift must be passed to the HR Manager who will return it to the donor explaining the company policy.

Employees and anyone working on behalf of **XXXXXXXXXX** must also disclose any anticipated conflict of interest which may have the potential to interfere with the person's loyalty and objectivity while carrying out their job. This includes any relationship with employees or representatives of a supplier, business associate or competitor which may influence or appear to influence their business judgement. Examples of this include (but are not limited to) having a relative or close personal relationship with someone who is employed by a supplier, business associate or competitor; having a significant interest in a company that we do business with; supervising a family member and having a second job. Any potential conflict of interest must be disclosed to the Operations Manager to allow us to establish the best course of action.

Agency Workers

Agency workers may not seek money, gifts, favours, or rewards for services rendered, either for themselves or for any third party under any circumstances. It is not uncommon for a patient, their friend or relative, to offer a voluntary gift as a mark of appreciation for care/service that has been provided. Any offer of a gift or incentive of any description to an agency worker must be politely refused; with an explanation that acceptance would be against ours and the Client's policy.

We will operate in accordance with the policies, procedures and restrictions of its clients in relation to corporate hospitality, gifts, conflicts of interest or an incentive where such information forms part of a contract or has been specified in writing to the company.

Information and Confidentiality

We are fully committed to our obligations under the UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018 (DPA) and any other legislation relating to the protection of personal data, including any amended, updated, replaced data protection and/or privacy legislation applicable in the UK. Details of our procedures are specified within our Data Protection and Privacy Policy.

We adhere to the principles relating to Processing of Personal Data set out in the Data Protection Legislation which require Personal Data to be:

- Processed lawfully, fairly and in a transparent manner (Lawfulness, Fairness and Transparency).
- Collected only for specified, explicit and legitimate purposes (Purpose Limitation).
- Adequate, relevant and limited to what is necessary in relation to the purposes for which it is Processed (Data Minimisation).
- Accurate and where necessary kept up to date (Accuracy).
- Not kept in a form which permits identification of Data Subjects for longer than is necessary for the purposes for which the data is Processed (Storage Limitation).
- Processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful Processing and against accidental loss, destruction or damage (Security, Integrity and Confidentiality).
- Not transferred to another country without appropriate safeguards being in place (Transfer Limitation).
- Made available to Data Subjects and Data Subjects allowed to exercise certain rights in relation to their Personal Data (Data Subject's Rights and Requests).

We are responsible for and are always able to demonstrate compliance with the data protection principles listed above (Accountability).

Employees and agency workers are required to keep client information confidential. Healthcare workers must also keep patient information confidential including but not limited to patient identity, clinical conditions and treatment.

Data obtained during diversity monitoring is collated and used to produce overarching reports. Individual details are kept confidential, and stored securely separately from the employee/worker's personnel file.

Confidential records will be managed as follows:

- Confidential information will only be available to employees who need to access it to undertake their job. All employees will sign a confidentiality agreement as part of their employment contract.
- Physical files will be kept in locked filing cabinets.
- Electronic / online records will be kept secure by in our password protected software.
- Confidential information will be destroyed in line with timescales, methods and standards required by prevailing data protection legislation.

Employee Conduct & Behaviour

All staff are required to conduct themselves in an appropriate and professional manner. Specifically, we require employees to:

- Treat colleagues, clients, suppliers, candidates and other 3rd party stakeholders with courtesy and respect at all times. Specifically this means adopting a friendly, collaborative

and professional manner, whilst maintaining respect for the opinions of others, even when they are different to their own.

- Maintain confidentiality of company and client information and not share anyone's personal data without written consent in alignment with our Data Protection and Privacy Policy.
- Follow company and Client/Participating Authority dress codes and wear PPE as required in alignment with the role being undertaken.
- Conduct business activities with honesty, transparency and integrity at all times.
- Perform their work with due skill, care and diligence and carry out reasonable requests and follow instructions from supervisors, managers and customers.
- Respect and embrace diversity and contribute to an inclusive and welcoming environment where everyone feels valued and empowered to succeed.
- Prioritise safety and wellbeing of both themselves and others in the workplace, and follow all health and safety protocols, procedures and guidelines to prevent accidents and injuries.
- Communicate clearly and professionally both verbally and in writing with clients, candidates, applicants and third parties.
- Avoid high pressure sales techniques, and use a consultative approach when promoting our services.
- Follow company guidelines with regard to use of social media with a view to protecting both company and client brands and reputation. Employees must never claim to represent the company or its clients or candidates unless authorised to do so. Furthermore employees must not post content that could be considered discriminatory, defamatory or misleading and must not engage in online arguments, harassment, discrimination or any other behaviour that could be deemed offensive or inappropriate.
- Adhere to all applicable laws, regulations and company policies in the performance of duties.

Employees must ensure strict compliance with all applicable laws, regulations, and company policies in the performance of their duties. This includes but is not limited to regulations concerning data protection, health and safety, equal employment opportunity, modern slavery and anti-discrimination. Any violations of these laws, regulations, or policies may result in disciplinary action, up to and including termination of employment.

Ethical Procurement & Treatment of Suppliers

We are committed to procuring works, goods and services in an ethically and environmentally sensitive way, yet with proper regard to our commercial obligations, ensuring that suppliers deliver to agreed timescales, quality and cost.

Purchasing is undertaken in a manner that encourages competition and offers fair and objective evaluation of bids from potential suppliers. We will also encourage participation from small, local, fair trade and minority organisations and pay invoices within agreed terms. Employees responsible for purchasing will not accept corporate gifts, or any type of solicitation that could be construed as enticement and potential suppliers will be required to demonstrate they are ethical, sensitive to the environment and operate within prevailing legislation.

Suppliers will be treated with transparency, fairness and respect and we in return expect them to treat their supply chain in an equivalent way.

Review

This policy will be reviewed regularly and may be altered from time to time in light of legislative changes or other prevailing circumstances.

