

Quintessa Ethical Policy

Owner: Managing Director

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Document History

Version	Date	Notes
1.0	20 Mar 2013	Produced by DPH and JAO
1.1	8 May 2017	Minor formatting and editorial changes by RHL
1.2	4 Sep 2017	Minor formatting and editorial changes by RHL
1.3	11 Feb 2019	Minor editorial changes by RHL
1.4	16 Jan 2020	Explicit reference to Modern Slavery Act 2015 added
1.5	8 Jan 2021	Replace reference to GDPR with Data Protection Act 2018
1.6	19 Jan 2022	Minor editorial changes by RHL

1 Purpose

Quintessa Ltd (“the Company”) is committed to the practice of responsible corporate behaviour.

Through its business practices, the Company seeks to protect and promote the human rights and basic freedoms of all its employees and agents.

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 of suppliers to the Company.

The Company is also committed to eliminating bribery and corruption. It is essential that all employees and persons associated with the Company adhere to its **Anti-bribery Policy** and abstain from giving or receiving bribes of any form.

This policy is non-exhaustive, and all aspects of the Company’s business should be considered in the spirit of this policy and the related **Anti-bribery Policy** and **Corporate Social Responsibility Policy**.

2 Human Rights

The Company is vehemently opposed to the use of slavery in all forms; cruel, inhuman or degrading punishments; and any attempt to control or reduce freedom of thought, conscience and religion.

The Company will ensure that all of its 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. It also recognises the requirements of the Modern Slavery Act 2015 and the need to prevent modern slavery risks within its own business and supply chains.

The Company 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 breach the human rights of those affected by the organisation's activities.

3 Employees' Rights

The Company is committed to complying with all relevant employment legislation and regulations. The Company regards such regulations and legislation as the minimum rather than the recommended standard.

No employee should be discriminated against on the basis of age, sex, race (including colour, nationality, and ethnic or national origin), sexual orientation, religion or beliefs, disability, gender identity or reassignment, marital or civil partnership status, or pregnancy and maternity/paternity. All employees should be treated equitably. Employees with the same experience and qualifications should receive equal pay for equal work.

Employees should be aware of the terms and conditions of their employment or engagement from the outset. In particular, employees must be made aware of the remuneration 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 should also be allowed such annual leave, sick leave, maternity / paternity leave and such other leave as is granted by legislation as a minimum.

The Company does not accept any corporal punishment, harassment in any form, victimisation, or bullying in any form. Employees are encouraged to report any such incidents so they can be investigated and acted upon.

4 Environmental Issues

The Company is committed to keeping the environmental impact of its activities to a minimum and has established an **Environmental Policy** in order help achieve this aim.

As an absolute minimum, the Company will ensure that it meets all applicable environmental laws in whichever jurisdiction it may be operating.

5 Conflicts of Interest

The Company holds as fundamental to its success the trust and confidence of those with whom it deals, including clients, suppliers and employees. Conflicts of interest potentially undermine the relationship of the Company with its partners.

All officers, employees and Associates of the Company are expected to act honestly and within the law.

6 Information and Confidentiality

Information received by employees, contractors or agents of the Company will not be used for any personal gain, nor will it be used for any purpose beyond that for which it was given.

The Company will at all times ensure that it complies with all applicable requirements of data protection legislation (including, but not limited to, the Data Protection Act 2018) in force from time to time, as set out in its **Privacy Policy**.

7 Stakeholders

The Company, its officers, employees and representatives are committed to ensuring that no act or omission which is within their power and which would have the effect of deliberately, negligently or recklessly misleading the employees or other stakeholders occurs.

8 Suppliers and Partners

The Company expects all suppliers and Associates to work towards and uphold similar ethical and moral standards.

The Company reserves the right to investigate the ethical record of potential new suppliers before entering into any agreement. Further, the Company reserves the right to request information from suppliers regarding the production and sources of goods supplied.

The Company reserves the right to withdraw from any agreement or other arrangement with any supplier or partner who is found to have acted in contravention of the spirit or principles of this policy.

9 Bribery and Corruption

The Company is fundamentally opposed to any acts of bribery and to the making of facilitation payments as defined by the Bribery Act 2010, as set out in the Quintessa **Anti-bribery Policy**.