

IKO PLC

Ethical Policy

1 Policy

IKO believes that it is important for the business and its employees to maintain high ethical standards in order to preserve its reputation in the marketplace.

Good ethics are important to ensure that the business meets not only its objectives in a fair and equitable manner but its wider social responsibilities externally. In addition, the business is committed to ensuring high ethical standards within the workplace.

The procedure that follows provides general guidance on ethics and refers to other policies of the business where necessary. The procedure will be closely monitored and will be developed as necessary to ensure that it meets the needs of the business, its employees and its stakeholders.

Approved by:

Policy 013


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Managing Director signature:

Effective:


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July 2013

Print name:


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Date:

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2 Procedure

1. All employees will be provided with ethics training as part of the induction programme. Ongoing ethics training, as the ethics policy and procedure develops, will be cascaded to employees via management.
2. All employees are required to adhere to the business's policy and procedure on business ethics. Employees who breach the business's policy on business ethics may be subject to disciplinary action up to and including dismissal.
3. Employees who are faced with a potential breach of the business ethics code or have doubts about an ethical choice they are facing should, in the first instance, speak to their line manager.
4. Policies relevant to this procedure are available on the Company Intranet or in the Employee Handbook or as part of the new starter induction pack.
5. The following areas are included in this procedure. However, this list is not exhaustive and will be developed as required.
 1. Dignity at work
 2. Restrictions during employment
 3. Restrictions upon and after termination of employment
 4. Equal opportunities
 5. Competition Law Compliance Handbook & Policy
6. The Data Protection Act 1998 requires that eight data protection principles be followed. These data protection principles are set out in the business's Data Protection/Access to Employee Data policy and all employees are expected to familiarise themselves with its requirements. Employees should ensure that they understand how data protection impacts on their particular role, in particular with regard to external suppliers and customers. Employees who have any questions on the business's Data Protection/Access to Employee Data policy should speak to their line manager in the first instance.
7. The business encourages a free and open culture in its dealings between its employees and all people with whom it engages in business and legal relations. The business recognises that effective and honest communication is

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essential if malpractice is to be effectively dealt with and the business's success ensured. Employees should refer to the business's Whistleblowing policy and procedure which provides guidance to employees who feel that they need to raise issues relating to the business with someone in confidence.

8. The business does not believe that the giving and receiving of gifts from suppliers and customers is appropriate. In certain circumstances gifts may constitute a bribe. An employee who receives a gift from a customer or supplier, regardless of its value, must inform his or her manager who will decide whether the gift may be kept by the employee or whether it should be returned.
9. A confidentiality clause forms part of all employees' statement of particulars/contracts of employment. During the course of employment employees will have access to information of a confidential and sensitive nature. Employees must not disclose to a third party any confidential information either during their employment or after their employment has ended. Confidential information includes information on the business's present or potential customers or suppliers and any information relating to the business's business, including marketing, corporate or financial plans.
10. The business recognises that work may result in friendships and closer relationships developing. Relationships may develop not only with colleagues but suppliers and customers. It is natural for relationships to develop in a working environment. While the business has every respect for the privacy of its employees, it asks that all employees consider the impact that personal relationships can have on the business.
11. The business is committed to equality of opportunity and diversity in the workplace. It is the business's policy to treat all job applicants and employees fairly and equally, regardless of their sex, trans-gender status, age, sexual orientation, religion or belief, marital status, civil partnership status, race, colour, nationality, national origins, ethnic origin or disability. Furthermore, the business will monitor the composition of the workforce and introduce positive action if it appears that this policy is not fully effective. Employees are required to conduct themselves in a way that promotes equal opportunities at all times. Good practice will be promoted by senior management and employees will be provided with relevant training. Employees who feel they have been discriminated against or suffered harassment should speak to a member of management immediately. Further information is available in the business's Dignity at work policy.

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12. Employees may seek to take up separate employment with another employer or pursue outside business interests while still remaining employed by the business. Although the business has no desire to unreasonably restrict an employee's external activities, it must seek to protect its own interests and those of all its employees. Employees will not be permitted to undertake business activities or other work where the business considers that this is incompatible with its interests or with the employee's health or safety and, in any event, unless employees have obtained prior written authorisation from senior management.
13. The business is committed to conserving the Earth's resources and to do what it can to reduce any negative effects it has on the environment. Employees are required to use the business's equipment and materials wisely and reduce wastage where possible. Employees can play a positive role in helping the environment by recycling all non-confidential waste, using printers and photocopiers with care and switching off electrical equipment which is not in use.

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