

Grovelands Code of Ethics

Our reputation and our brand are shaped by how we behave. Our Code of Ethics demonstrates that we will operate responsibly and in accordance with all relevant laws and regulations and we will set clear standards of behaviour for everyone at Grovelands.

Specifically we will:

- Promote ethical business practice
- Ensure equal opportunities
- Provide a safe and healthy work environment
- Value diversity in the workplace
- Provide a safe route for people to highlight non-compliance

These practices sit alongside our **values**:

- **Relationship Over Revenue** – we're in it for the long game
- **Discernment** – 'we can do it' isn't the same as 'we should do it'
- **People Focus** – our people are celebrated – not tolerated

This code also works in conjunction with several of our policies:

- Diversity
- Corporate Social Responsibility
- Whistleblowing
- Code of Conduct Policies
- Modern Slavery & Human Trafficking
- Health & Safety at Work
- Personal Relationships at Work

Doing Business

In the course of doing business with clients, candidates, suppliers and other third parties, we must behave with integrity and professionalism. We always conduct our own services honestly and honourably, and expect our clients and suppliers to do the same.

We are committed to maintaining the highest degree of integrity in all our dealings with potential, current and past clients and candidates, both in terms of normal commercial confidentiality, and the protection of all personal information received in the course of providing the business services concerned.

We conduct all of our activities professionally and honestly. We take great care to be completely objective in our judgement and any recommendations that we give, so that issues are never influenced by anything other than the best and proper interests of our clients.

All of our stakeholders are our main priority and all dealings with them must be undertaken with honesty, integrity and openness.

Customers must not be miss-sold services that are unsuitable for their businesses and contracts made with customers must be honoured. Customer data will always be treated with sensitivity and respect and must not be used for personal gain. All data is handled in a way that meets the requirements of data protection laws in the countries in which we operate.

Diversity & Equal Opportunities *(separate policies can be viewed on request)*

We operate a policy that prevents discrimination during any aspect of recruitment or employment on grounds of gender, religion or belief, race, creed, age, disability, sexual orientation, ethnic origin or marital status. We aim to create an environment in which all our employees can develop their full potential. Valuing and promoting diversity across all of our businesses is an essential part of achieving that goal.

We always strive to be fair and objective in our advice and actions, and we are never influenced in our decisions, actions or recommendations by issues of gender, race, creed, colour, age or personal disability.

Forced Labour and Human Trafficking

It is vital that we treat all of our people fairly, respecting human rights and equal opportunities whilst maximising the talent, capability and performance of our people to benefit our business and ultimately the customer.

Forced labour is work or services exacted from a person under threat or penalty, which includes penal sanctions and the loss of rights and privileges, where the person has not offered him or herself voluntarily. It includes slavery and abduction, misuse of public and prison works, forced recruitment, debt bondage and domestic workers under forced labour situations, and internal or international trafficking.

Human Trafficking is the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs. Grovelands will not partake in exploitative labour practices and any associated criminal conduct. No employee may be compelled to work through force or intimidation of any form, or as a means of political coercion or as punishment for holding or expressing political views and we expect our clients and suppliers to take the same stance.

Health and Well-being *(separate policies can be viewed on request)*

Grovelands will do its utmost to provide a safe and healthy work environment, ensuring that local legislation regarding health and safety is adhered to in full. This includes measures to prevent stress at work.

Many of our employee benefits are designed to promote well-being such as the healthcare cash plan, cycle to work scheme, subsidised gym membership and work/life balance related benefits.

We will take a zero-tolerance approach to any violent or threatening behaviour at work which includes abuse, threats, intimidation or assault. If any of our employees are subject to such behaviour whether by a colleague or third party, we will investigate all claims thoroughly and take appropriate action.

Bribery & Corruption *(separate policies can be viewed on request)*

Bribery involves one person offering a financial or other advantage to another in return for some improper favour or advantage. Corruption may include activities which could also amount to fraud or bribery. We are committed to acting professionally, fairly and with integrity in all our business dealings, wherever we operate. Grovelands has a policy designed to support this.

Whistleblowing *(separate policies can be viewed on request)*

We are concerned about the welfare of all of our employees and are committed to a working environment based on fairness, honesty, and integrity. The Whistleblowing procedure allows an employee to safely report and expose suspected wrongdoing at work. It is paramount that employees feel able to raise their concerns without fear of victimisation and our whistleblowing policy supports this.

Nepotism *(separate policies can be viewed on request)*

Grovelands believes that all employees should enjoy the same treatment during their tenure. As such we have implemented the Personal Relationship policy policies to prevent unfairness in the employment relationship between employees.

Nepotism also applies to family relations and close friendships. A Grovelands employee may not directly influence decisions related to the recruitment, hiring or the terms and conditions of employment of a person who is a member of the employee's immediate family, with whom he or she shares a household, or with whom he or she has a close personal relationship or friendship.

Grovelands regards any kind of favouritism as unprofessional behaviour and we strive to promote professionalism at work. Any claims of favouritism will be fully investigated and appropriate action taken.

Corporate Social Responsibility *(separate policies can be viewed on request)*

Our Corporate Responsibility statement sets out minimum expectations and standards around managing our environmental impact, supporting community and charitable work, managing our responsibilities as an employer and maximising the positive impacts we have on the world of business.

Maintaining proper employment records

All personnel records must be kept in accordance with applicable laws. All employee data is stored on our confidential HR system which is only accessed by the HR team which ensures utmost confidentiality at all times. All paper documents are stored electronically on the HR drive which again, is only accessed by the HR team.

Employee Views

Grovelands listens and responds to views and opinions through formal and informal means including employee surveys, the employee forum, meetings and one to one discussions. Our people will be involved in decisions that affect them.