CODE OF CONDUCT POLICY

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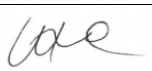
Classification	Internal	**Approved By:**	

*This Policy is available in other formats and languages if required, please contact the People Team

Version Control

Effective Date	Version	Changes	Author(s)
March 2021	V1	Introduction of version control page	Kelly Convery
March 2021	V1.1	Updated Introduction. Updated Company Name. Updated clause 3. Updated clause 4. Updated wording in Clause 4.4.4. Updated clause 9. Updated word 'You' to 'Employee'. Updated wording in clause 10 & 11.	David Summerhayes, Kelly Convery
Jan 2022	V1.2	Updated clauses 3.1, 4.4, 5.2, 6.2 to reference (C)TPS / TPS guidelines, Block Me process and Block Me Policy	Legal Team
March 2023	V2	As part of the Policy review, the following changes have been implemented; New template The following policies amalgamated: Alcohol and Drugs, Anti-Bribery and Corruption, Company Social Events, Dress Code and Appearance, Prohibited Recordings, Political Activity. References to Fraud Prevention, Conflicts of interest and Anti-Competitive behaviour included References to internal policies and external legislation/guidelines added Removal of clause numbers Page numbers inserted Font changed from 'Arial Narrow' to 'Arial'	Claire Devlin, Alexandra Besnard

May 2023	V2.1	Updated section 4.6 to include reference to drug wipes/swabs Updated section 15 to refer to Supplier Code of Conduct Updated section 4.4 to include reference to OTC medication	Claire Devlin
May 2024	V2.2	As part of the Policy review, the following changes have been implemented; Format changes including size and font amendments to 'Arial' and size 12 and colour of subheading changed from purple to black. Email addresses corrected to GPG addresses. Updated Clause 4.4	Carly Thompson
July 2025	V2.3	Formatting changes including removal of spaces and positioning of wording.	Carly Thompson

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1. PURPOSE

The Code of Conduct outlines the standards of behaviour which the Company (Global Procurement Group Limited and any of its subsidiaries) expects from all employees in respect of attendance, conduct, health and safety and compliance. You are expected to understand and comply with all Company policies, embrace the Company's commitment to integrity and avoid any breaches of policy. You should raise any concerns that you may have with Company policies to the People Team at people.team@gpg.international

This policy applies to employees only and is not part of the Contract of Employment. It may be reviewed and/or amended at any time, and we may depart from it depending on the circumstances of any case.

For those Employees who are based outside of the UK, should there be any conflict between this policy and local law, or any location-specific Code of Conduct Policy put in place by the Company (or any subsidiary) from time to time, the local law or location specific policy shall take precedence over this policy.

2. GENERAL CONDUCT

The following general standards apply to all employees:

- Comply with all Company policies and procedures.
- Regularly attend work, and display punctual time keeping including breaks, etc.
- Accurately record information and/or Company and business-related documents
- Not breach Company confidentiality and disclose Company documents and/or statistics to a third party, unless otherwise authorised.
- Safeguard Company property; use same only on Company business and treat it with due care.
- Maintain safe working conditions, ensuring the safety of themselves and of others.
- Not use notice boards for the display and/or distribution of literature unless authorised.
- Not display disorderly conduct of any kind
- Not bring the company into disrepute
- Not gamble during working hours including online methods
- Not consume alcohol, non-prescribed drugs and/or any form of illegal substances during working hours
- Avoid situations which may create a conflict of interest or appear to cause a conflict of interest.
- Maintain reasonable standards of personal attire and hygiene.
- Behave in a respectful and professional manner and ensure behaviour does not breach the Equality Act 2010
- Comply with all reasonable management instructions; and
- Satisfactory standards of performance at all times

The above list is not exhaustive.

3. CUSTOMER INTERACTION

Customer satisfaction is of the utmost importance to the Company and is critical to the success of the business. The Company expects that you are committed to always providing the best service for all customers.

You should adhere to the following guidelines when dealing with customers:

- Follow compliance rules at all times.
- Provide accurate and relevant information to customers at all times including, where requested, details of the remuneration it is proposed the Company will receive on a proposed energy contract.
- Strive to ensure customer satisfaction at all times.
- Work with customers to find the best-fit solution for the customer at all times; and
- Ensure you are clear about services offered, contact details and charges and that the customer fully understands these.
- Not intentionally call (c) TPS / TPS registered numbers
- Comply with Block Me procedure, the (c) TPS / TPS and Block Me Policy
- Accurately record and inform IT when a customer has requested their telephone number and contact details to be blocked.
- Ensure screening of all numbers with the (c) TPS / TPS list.

The above list is not exhaustive.

4. ALCOHOL AND DRUGS

Alcohol and drug misuse can have an adverse effect not just on an individual but on colleagues, customers, and the public. Having a safe working environment, providing excellent customer service by maintaining productivity levels and avoiding days being lost to illness, are all critical to the Company's success. The Company takes seriously its legal obligations to comply with the Health and Safety at Work Act 1974 and the Misuse of Drugs Act 1971.

Breaches of the policy will be taken very seriously and may be dealt with under the Company's Disciplinary Policy and Procedure.

4.1 Drugs

For the purpose of this policy, the term 'drugs' refers to illegal substances (or legal substances which induce similar effects to legal drugs) or other substances, for example, solvents. The use of drugs also includes the use of 'legal highs' or psychoactive drugs, which are legal substances, however, give the effect of illegal drugs. Drug misuse also refers to the misuse of prescribed medication.

If you are prescribed medication, advice from your GP must be sought regarding the effect on your ability to carry out your role, and whether any duties should be modified. If so, you should advise the People Team and your manager immediately.

4.2 Alcohol

In a social environment, the consumption of alcohol in moderation is an accepted part of life. In the workplace however it can impair performance, result in inappropriate behaviour, and can place both you and those around you in danger, as well as affect health. In the workplace alcohol abuse can take two different forms:

- occasional inappropriate drinking
- consistently inappropriate drinking

Problems arising from the first category are more likely to be cases of misconduct, whilst the second will more likely involve long-term health and performance issues. In either case, your health will be affected and quite possibly the health and safety of those around you.

4.3 Symptoms

Symptoms of alcohol and or/ drug abuse may include:

- Increased and frequent absence levels
- Identified patterns of absence
- Unkept appearance/lack of hygiene
- Sporadic work patterns and lower productivity
- Poor relations with others
- Fluctuation in mood or energy
- Erratic or sudden changes in behaviour
- Confusion
- Irritability
- Reduced or underperformance.

4.4 Restrictions on Alcohol and Drugs at work

You are expected to arrive at work fit to carry out your role and to be able to perform your duties safely without limitations due to the use or after-effects of alcohol and/or drugs.

Unless it is formally approved by the Executive team (for those that meet the legal drinking age), you are prohibited from consuming alcohol during normal working hours, nor should you be incapable of working through the consumption of drugs or alcohol.

Non-prescription drugs cannot be consumed in, or brought onto Company premises, land, or vehicles at any time, irrespective of the employee's status or their business with the Company. The prohibition of non-prescription drugs extends to all activities carried out by you whilst you are at work. This includes, but is not limited to:

- Driving on company business time
- When on call or standby duties
- When on Company business trips

- Training and Social events.

The company recognises that you occasionally may need to take over-the-counter medication for a legitimate reason, e.g. antihistamines for hay fever. In this case, it should be stored away safely within your personal belongings.

Sharing drugs (of any kind) in the workplace or during company events is strictly prohibited.

Managers should act to prevent excessive consumption of alcohol by any member of staff and should take steps to deal with any unacceptable conduct. Any such behaviour may lead to disciplinary action.

Alcohol must not be consumed in any situation where the safety of you, other employees or visitors is put at risk.

Alcohol must not be consumed in excess or in sufficient quantities to affect your ability to carry out your duties when on Company business outside normal working hours, for example when involved in functions or in providing hospitality.

You are not obliged to work with anyone you consider to be incapable through the consumption of alcohol or drugs and should immediately report the matter to the People team. You should not attempt to cover up for a colleague whose work or behaviour is suffering as a result of an alcohol or drug-related problem.

If you believe that you have an alcohol or drug-related problem or you believe that a colleague has an alcohol or drug-related problem, you should seek or encourage them to seek specialist advice and support as soon as possible. If you are or become incapable of working through the consumption of alcohol or drugs, you will be immediately removed from your duties and the matter reported to the People Team so that appropriate actions can be taken. You must comply with drink-driving laws and drug-driving laws at all times. A conviction for drink-driving or drug-driving offence may harm our reputation and, if your job requires you to drive, you may be unable to continue to do your job. Committing a drink-driving or drug-driving offence while working for us or outside working hours may lead to action under our disciplinary policy and procedure and could result in dismissal.

4.5 Searches

The Company reserves the right to conduct searches for drugs or alcohol on Company premises including searches of lockers, filing cabinets, bags, desks, drawers, clothing, and personal belongings etc.

Any alcohol or drugs found as a result of a search will be confiscated and action may be taken under our Disciplinary Policy and Procedure. The Company also reserves the right to report to the matter to the police, should non-prescribed drugs be found.

4.6 Testing

The Company reserves the right to request drug and alcohol testing randomly, where management has reasonable grounds to believe that an individual is under the influence of alcohol or drugs.

The Company holds a stock of drug-testing wipes and swabs which are used to detect drugs on surface areas. The Company reserves the right to use this equipment at its discretion.

4.7 Help and Support

If you are diagnosed with a drug and/or alcohol-related problem, the Company will treat it as a health matter. However, this does not excuse you from any of the disciplinary matters that may fall within the scope of the Company's Disciplinary Policy and Procedure.

Drug and alcohol-related problems may develop for a variety of reasons and over a long period of time. All drug and alcohol-related issues will be dealt with, as far as possible, in a constructive and sympathetic manner. The People or Wellbeing Teams can provide advice and details on where to seek further information and support.

All requests for help or advice will be treated in the strictest confidence and all information gathered as a result will be held in accordance with our Data Protection Policy. However, it must be recognised that, in supporting you, some degree of information-sharing is likely to be necessary.

After receiving any appropriate medical reports, the Company will review what support it can provide to you. Where you agree to follow a suitable course of action or treatment, any disciplinary action may be suspended.

The Company reserves the right to give you lighter duties or require you to take paid leave if it is deemed appropriate. Following effective treatment and in the absence of any disciplinary action the Company will endeavour to return you to the same role previously fulfilled, and where this is not possible, to a suitable alternative if available.

If, following successful treatment for an alcohol or drug-related problem you suffer a relapse, the Company is under no obligation to make provision for any further treatment, and you may face summary dismissal. If it is considered that the working environment or culture is the cause or a contributor to an alcohol or drug-related problem, the Company will take all reasonably practical steps to ensure a reduction of such problems.

If you do not finish a programme of treatment, or your recovery and return to work does not go as planned, your line manager or the People Team will meet with you to decide what further action if any, should be taken.

You should contact a Mental Health First Aider (MHFA) via wellbeing@gpg.international or the People Team if any support is required.

4.8 Sources of External Support

Alcohol Dependence

Drinkline
Helpline: 0800 917 8282
Drinkline runs a free, confidential helpline for people who are concerned about their own drinking, or someone else's.

NHS Choices Website
http://www.nhs.uk/conditions/Alcohol-misuse/Pages/Introduction.aspx
National Health Service advice page.

Drinkaware
https://www.drinkaware.co.uk/
Drinkaware works to reduce alcohol misuse and harm in the UK.

Addaction
http://www.addaction.org.uk/default.asp
Addaction is the UK's leading drug and alcohol charity, helping over 40,000 people a year to recover from their addiction problems.

Al-Anon
http://www.al-anonuk.org.uk
Provide support to anyone whose life is, or has been, affected by someone else's drinking, regardless of whether that person is still drinking or not.

Alcoholics Anonymous Great Britain
http://www.alcoholics-anonymous.org.uk
AA is an organisation of men and women who share their experiences with each other hoping to solve their problems and help others to recover from alcoholism.

Drug Dependence

NHS Choices Website
http://www.nhs.uk/Livewell/drugs/Pages/Drugtreatment.aspx
National Health Service advice page.

Addaction
http://www.addaction.org.uk/default.asp
Addaction is the UK's leading drug and alcohol charity, helping over 40,000 people a year to recover from their addiction problems.

Talk to Frank
http://www.talktofrank.com/
National drugs awareness site for young people and parents/carers.

Narcotics Anonymous
http://ukna.org/
Helpline for the UK: 0300 999 1212

N.A. is a non-profit fellowship of recovering addicts who meet regularly to help each other stay clean. Membership is open to anyone with a drug problem seeking help, regardless of what drug or combination of drugs have been used, and irrespective of age, sex, religion, race, creed, or class. The only requirement for membership is a desire to stop using drugs.

5. GIFTS AND HOSPITALITY

In general, the Company discourage employees from accepting or giving gifts or hospitality from/to customers, suppliers or any other person or organisation with which the Company has (or might have) business connections. It is important to ensure that you do not act in any way that is inconsistent with the Company's objectives or with the integrity of the business by accepting a gift in circumstances where it could influence, or be seen to influence, your business actions or decisions.

The Company accepts appropriate gestures of hospitality and goodwill, so long as the giving or receiving of gifts meets the following requirements:

- It is not made with the intention of influencing the party to whom it is being given, to obtain, retain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- It is not made with the suggestion that a return favour is expected.
- It is compliant with local law.
- It is given in the name of the Company, not in an individual's name.
- It does not include cash or a cash equivalent (e.g., a voucher or gift certificate)
- It is appropriate for the circumstances (e.g., giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion)
- It is of an appropriate type and value and given at an appropriate time, considering the reason for the gift.
- It is given/received openly, not secretly.
- It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- It is not above a certain excessive value, as pre-determined by People Team (usually in excess of £100)
- It is not offered to, or accepted from, a government official or representative or politician or political party, without the prior approval of the People Team.
- It complies with any applicable local law.

Any gifts received should be returned to the third party with an explanation to the effect that it is not our policy to accept gifts.

Where it is inappropriate to decline the offer of a gift (i.e., when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the People Team, who will assess the circumstances. The Company recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each. As good practice, gifts given and

received should always be disclosed to the People Team. Gifts from suppliers should always be disclosed. The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the People Team should be sought.

When considering whether to accept or decline a gift, the following table should be used for guidance to ensure the correct procedure is followed and approval is obtained in writing:

Benefit received	**Procedure**
Small gift (branded), below £50 (Includes diaries, calendars, pens and so on)	Individuals may accept. No recording or approval required.
Small gift (non-branded), below £50 (Includes diaries, calendars, pens, bottles of champagne, spirits and so on)	Individuals may accept. No recording or approval required unless two or more gifts are received within a six-month period in which case notify your line manager.
Gifts worth £50 or more	Gifts exceeding £50 require prior written approval from the People Team. All gifts must be recorded and surrendered to the business to be disposed of in one of the following ways: • Displayed in the office. • Raffled off to allow all employees in the department or business to have a chance to benefit. • Donated to a charity. • If edible, placed in a break room for everyone to share.
Attendance at business functions associated with your role or your professional status (that is, professional dinners or events)	Obtain prior written consent from your line manager and record the attendance.
Attendance at purely social events (such as sporting events, horse racing, and golf days)	In all cases (irrelevant of value) seek prior written approval from your line manager and record.
Hospitality accepted (such as lunches, and dinners)	Ensure that the hospitality is reasonable, proportionate, and not lavish and that the organisation would be willing to reciprocate. All hospitality accepted should be reported to your line manager and recorded.

In general, gifts should not be given to clients or potential clients, third parties or anyone outside the Company unless the gifts are branded products (for example, pens and stationery), modest refreshments and hospitality and celebrations (for example, the conclusion of a project) or have been pre-approved in writing by the People Team. In determining whether giving a gift is appropriate, consideration should be given to the recipient, the value of the gift and the reason for it. If you are in doubt as to whether a gift or hospitality should be given, please seek advice from your line manager or the People Team.

6. ANTI-BRIBERY AND CORRUPTION

The Company upholds a zero-tolerance position on bribery and corruption, and is committed to conducting business ethically, fairly, and professionally, with integrity in all dealings and relationships.

Bribe means a financial or other inducement or reward for an action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

Bribery includes offering, promising, giving, accepting, or seeking a bribe.

Corruption is the misuse of office or power for personal gain and is a form of bribery.

All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with your manager or the People Team.

Specifically, you must not:

- give or offer any payment, gift, hospitality, or another benefit in the expectation that a business advantage will be received in return, or to reward any business received;
- accept any offer from a third party that you know, or suspect is made with the expectation that we will provide a business advantage for them or anyone else;
- give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure.

You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.
You are reminded of the Company's Grievance and Whistleblowing policies.

If there is reason to believe or suspect that bribery or corruption has occurred or will occur, then the People Team must be notified in writing without delay, or any concerns can be reported to Safecall, an external organisation that allows an independent and confidential route for concerns to be reported. Concerns can be reported to Safecall online via www.safecall.co.uk/report or by telephoning 0800 915 1571.

Should we find that an act of bribery attempted bribery and/or corruption has occurred, then the Company may take disciplinary action under the Company's Disciplinary Policy and Procedure.

The Company will support anyone who raises such concerns in good faith and will ensure that no detrimental treatment is suffered as a result of refusing to accept or offer a bribe or other corrupt activities or because you reported a concern.

7. FRAUD PREVENTION

7.1 Types of Fraud that could occur in the workplace are:

- theft of company property, including information;
- forgery or alteration of company documents;
- wilful destruction or removal of company records;
- falsification of expense claims;
- unauthorised disclosure of confidential information to outside parties;
- misappropriation or use of company assets for personal gain;
- undertaking or assisting in illegal activity (including money laundering, which is covered by the Group Anti-Money Laundering Policy*);*
- acceptance of bribes or gifts to favour third parties (please see the section 6 on Bribery and Corruption);
- unauthorised premium discounting;
- knowingly generating or paying false claims or invoices.

7.2 The Board and management team will have a responsibility to ensure adequate anti-fraud measures and controls are present in all the systems the Company operates. However, you are equally expected to be vigilant and play an active part in preventing or identifying fraud activity.

7.3 Please report all suspected fraud to People Team or refer to the Whistleblowing Policy without delay. If you would rather report your suspicion, confidentially, you can contact Safecall. All known or suspected incidences of fraud will be thoroughly and impartially investigated.

7.4 All investigations will be carried out objectively and confidentially, and independently of the line management for the area in which the fraud has occurred or is suspected.

7.5 We will report breaches discovered in the course of investigations to the relevant authorities, including HM Customs & Excise, Inland Revenue, FSA, and the appropriate authorities overseas. The timing of such involvement will be at the discretion of the Company.

7.6 Should you be involved in a fraud against the group, the matter will be dealt with under the Disciplinary Policy and Procedure. We may also reserve the right to refer the matter to the police wherever appropriate and seek to recover any loss due to the fraud through legal means.

7.7 The Company will manage the fraud risk by:

- defining, setting, and maintaining cost-effective control procedures to identify and deter fraud;
- investigating all incidences of actual, attempted, or suspected fraud, and all instances of major control breakdown;
- encouraging staff to be vigilant and raising fraud awareness at all levels;
- ensuring key controls are complied with;
- providing staff with effective confidential reporting mechanisms and encouraging their use;
- taking action against individuals and organisations perpetrating fraud against the group and seeking restitution of any asset fraudulently obtained and the recovery of costs;
- co-operating with the police and other appropriate authorities in the investigation and prosecution of those suspected of fraud.

8. COMPANY SOCIAL EVENTS

You may be offered the opportunity to or may be required to attend social events. Clients, suppliers, and/or guests may attend such events. Although such social events usually take place away from the workplace and outside of normal working hours, you will be required to conduct yourself in a manner consistent with your conduct at work and respect our policies on anti-harassment and bullying, disciplinary and equal opportunities apply fully at these events.

If you attend work-related social events you must adhere to the following rules and principles, as inappropriate behaviour will not be tolerated:

- You must take reasonable precautions as to your own health and safety, and that of others who may be affected by your actions and/or behaviour, at all times.
- Any alcohol should be consumed in moderation at work-related social events, and/or work events organised by the Company irrespective of whether the Company provides or pays for the drinks.
- The use of illegal drugs, including cannabis, at any work-related social event whether on Company premises or external independent venues is strictly prohibited.
- The Company's Anti-Harassment and Bullying policy applies to work-related social events.
- You should not say or do anything at a work-related social event that could offend, intimidate, embarrass, or upset any other person, whether as a joke or not.
- Swearing and foul language are unacceptable at work-related social events.
- You must adhere to any rules associated with the hosting venue.
- You must not behave in any way at any work-related social event that could bring the Company brands and its clients into disrepute.
- You are required to report to work the next working day following an event, in a fit state to work. Any unauthorised absence or attendance at work in an unfit state may be addressed as a disciplinary matter.

Where inappropriate behaviour is exhibited, you may be asked to leave, and disciplinary action may be taken in line with the Company's Disciplinary Policy and Procedure.

Should you intend to drive following a social event, it is your sole responsibility to ensure that you adhere to legal driving limits. The Company accepts no responsibility for determining your fitness to drive. You are responsible for making your own travel arrangements, and it is recommended that these arrangements are made in advance of any event.

You are solely responsible for your own belongings at such events, and the Company will not accept liability for any accidents, damage or loss incurred.

If the event involves travel and/or accommodation, you are responsible for arranging your travel and/or health insurance (if applicable). The Company does not accept any liability for any accidents, damage or loss incurred whilst attending any events, or trips, whether or not you have taken out a suitable insurance policy.

The Company reserves the right to photograph and/or film any events and to use images and recording for associated Company business. Any such images will be processed in line with the Data Protection Act 2018, our Privacy Notice and Data Protection Policy.

9. DRESS CODE AND APPEARANCE

The Company expects you to present a professional image with regard to appearance, standards of dress and hygiene. You are expected to be clean and presentable whilst at work, including on Company premises or if representing the Company elsewhere.

You are expected to dress in business wear during working hours. Examples of acceptable clothing includes (but is not limited to):

- Business suit, smart jacket/blazer and/or shirt
- Trousers, skirt or dress
- Shirt or blouse
- Appropriate shoes must be worn. Trainers are not acceptable.
- Hair should be neat and tidy. Jewellery must not be excessive.
- Clothing should be clean and tidy.
- Appropriate uniform should be worn, where it has been provided in accordance with your role. This should be clean, tidy, and worn in a presentable manner.

During approved Company 'dress down' days, casual clothing may be worn to work. Clothing must not be untidy, revealing, or have any slogans or images that could cause offence. Footwear must be safe and clean and take into account health and safety considerations. Where there are client, customer and/or supplier business appointments, or recruitment interviews, then business wear must be worn.

The Company recognises the diversity of cultures and religions within the workforce and understands that certain ethnic or religious groups are subject to religious or

cultural clothing and appearance. You may wear appropriate religious and cultural dress unless it creates a health and safety risk to you or any other person.

You will be issued with an identification badge and Company lanyard that must be worn and visible at all times when attending work. You must not wear your Company lanyard and ID badge outside of the office unless you are on an approved client visit or attending a work event. This must not be worn whilst driving, for health and safety reasons.

10. PROHIBITED RECORDINGS

The Company does not authorise any audio, photographic, screenshots and/or video recordings to be taken on Company premises (during or outside of working hours). This includes the following where it relates to Company business:

- Meetings (formal or informal)
- Conversations within the working environment (including any home office)
- Conversations via electronic devices (email and/or text)
- Video meetings or conference calls
- Telephone calls

This list is not exhaustive.

Prior written approval from a Company Director must be obtained if you wish to make a recording that is prohibited by the Company under this policy. Any recording that is made (whether in breach of this policy or not) is strictly private and confidential to the Company.

Should you possess any recording obtained without approval in line with this policy, a copy must be provided to a Company Director without delay and all further copies held by you must be deleted. The Company may at its discretion require you to provide a sworn affidavit confirming how you obtained the recording, who you have shared the recording with, and that you have deleted and not retained any further copies.

11. CONFLICTS OF INTEREST

A conflict of interest arises when GPG's business or that of our customers could be affected by personal interest or personal association.

As an employee, you must:

- disclose any personal interest, or that of a member of your immediate family, in relation to the GPG's business. Conflicts of interest may include directorships, significant shareholdings, and the employment of family members;
- remove yourself and anyone that works for you from making decisions that may create a conflict of interest with your personal interest; and

- comply with the Gift and Hospitality requirements in section 5 above, which set out what is considered acceptable in a gift given or received, and how it is to be recorded.

You must not:

- use any information you receive in the course of your employment for personal gain or any purpose except that for which it is given; or
- give money or any gift of significant value to a client, advisor or agent or supplier, public official or any other person, nor accept any gift or service, in either case for an improper purpose, for personal gain or if it could be construed as being intended as a bribe.

12. EXTERNAL BUSINESS INTERESTS

You are prohibited from dedicating any time to any business other than the business of the Company which may:

- conflict with the Company's business interests.
- adversely affect the Company's reputation or relations with others
- affect your ability to carry out your job duties and responsibilities efficiently.

The Company shall determine if any of the above are a concern. The Company will also consider its obligations under the Working Time Regulations 1998.

Except with the Company's prior written approval, you are forbidden to be directly or indirectly engaged or have any financial interest in any other business, trade, profession, or occupation. However, this shall not prevent you from holding stocks, shares, or debentures so long as no more than 5% of the shares or stock of any class of any one company is held and provided such company does not carry on a business which is in competition with the Company's business.

If you wish to be engaged in secondary employment or have any outside business interest, whether financial or otherwise, you must first seek written permission. All requests should be made in writing to the People Team. You are required to declare any interests to the Company in writing.

The above does not apply to your involvement in a trade union or public activities, such as becoming a magistrate, Justice of the Peace, or a member of a local authority, tribunal, or school governing body.

13. ANTI-COMPETITIVE BEHAVIOUR

You are prohibited from engaging in any activity that promotes unlawful anti-competitive behaviour.

You are required to be diligent in all dealings with any competitors and to be aware that talking about prices may be anti-competitive.

In instances where our customers engage us to conduct procurement for them, you are required to comply with all rules relating to the prevention of anti-competition.

Our Anti-Competition programme consists of the following elements:

- Consideration of anti-competition risks when exploring new business opportunities;
- Ensuring adequate policies and procedures are formulated;
- Investigating allegations relating to anti-competitive behaviour and taking appropriate action accordingly;
- Communicating the message of fair and open competition to the business.

The responsibility for the implementation of this policy rests with all GPG employees, our partners and those who represent us.

Competition law is designed to protect free and fair competition. These laws prohibit arrangements with competitors such as price fixing or abuse of a dominant position.

Failure to observe competition rules can have serious financial and reputational consequences for GPG. GPG is committed to complying fully with competition laws. Conduct that gives rise even to a suspicion of a breach of competition rules, and which leads to an investigation by the competition authorities, can result in unnecessary expenditure of our time and resources.

Agreements between competitor organisations can give rise to competition law concerns. An ‘agreement’ can include an understanding or even an intention to do something. It may not be obvious who is a competitor and there may be instances where our suppliers, customers and business partners may be in competition with us.

Typical examples of anti-competitive behaviour include:

- Sharing of competitively sensitive information (i.e. detailed commercial terms and prices) with competitors.
- Entering into agreements with competitors as to how customers should be treated in commercial negotiations.
- Entering into agreements not to compete for customers.
- Contractual restrictions in supply agreements that reduce consumer choice and affect prices.
- Fixing prices of services among the competitors within the domestic or international market;
- Rigging bids among competitors in order to enable a competitor to win the bid;
- Allocation of a geographic market among competitors for the purpose of doing business;
- Unlawful exclusivity arrangements among entities that encourage monopolisation; and
- Unlawful mergers and acquisitions among companies.

If you have concerns about any arrangement proposed by an employee/colleague, customer, or supplier you should report it immediately to the legal team. If you find

yourself in a discussion or correspondence that you think is anti-competitive you should make your concerns known and withdraw from that discussion.

14. POLITICAL ACTIVITY

The Company recognises your right to hold political opinions and to take part in political activity in your own time. You may however not take part in any type of political activity whilst at work.

Outside work, you must not behave in a way that could be detrimental to the Company, its relationships with clients or customers or its reputation.

15. EXTERNAL SUPPLIERS

Without exception, all agreements and terms of business must be reviewed in the first instance by the Legal Department to ensure that the Company is willing and able to comply with the proposed agreement.

No external supplier business terms or agreements should be entered into or signed unless the Legal Team has provided written approval.

Any queries should be directed to legal.team@gpg.international

The Company expects that all of its suppliers adhere to the Supplier Code of Conduct and shall ensure its supply chain adheres to the Code of Conduct, in order to enforce and promote sound social, ethical, environmental, and economic practices.

16. CONFIDENTIALITY

Everyone is required to comply with the UK General Data Protection Regulations (UK GDPR) when handling personal and confidential data. Please read our Data Protection (GDPR) Policy and Privacy Notice carefully.

You are likely to have access to information which is private or confidential to the Company or customer. Such information may be held on electronic office equipment or in manual paper files. You must ensure that confidential information is only made available to those who need to know it in carrying out Company work and that it is never disclosed to anyone else, whilst you are in employment and after leaving the Company's service.

You should refer to your terms and conditions of employment for additional information relating to confidential information.

17. BREACHES

You should report any concerns of breaches to this policy to the People Team at people.team@gpg.international

Any breach of this Code of Conduct or failure to achieve or maintain Company standards may result in disciplinary action in accordance with the Company's Disciplinary Policy and Procedure, up to and including summary dismissal.

18. REFERENCES

Legislation, regulation, and guidance from external organisations, including:

- ACAS Code of Practice on Disciplinary and Grievance Procedures
- Equality Act 2010
- General Data Protection Regulations (GDPR)
- Bribery Act 2010
- Health and Safety at Work Act 1974
- Misuse of Drugs Act 1971
- Safecall

Related internal policies and procedures:

- Disciplinary Policy and Procedure
- Anti-Harassment and Bullying Policy
- Diversity, Equity and Inclusion Policy
- Grievance Policy
- Whistleblowing Policy
- Data Protection (GDPR) Policy and Privacy Notice
- Information and Communications Policy
- Social Media Policy
- Health and Safety Policy
- (C)TPS/TPS and Block Me Policy
- Anti Money Laundering Policy
- Supplier Code of Conduct

Policy last updated: 2nd July 2025