

**Verner Wheelock Associates Limited
Business Ethics Policy and Code of Conduct
04 January 2021**

1. Overview

1.1 Verner Wheelock Associates Limited (“the Company”) is committed to the practice of responsible corporate behaviour and to complying with all laws, regulations and other requirements which govern the conduct of our operations and will not tolerate any wrongdoing or impropriety at any time. The Company will act quickly in correcting the issue if the Ethical Code is broken on any occasion.

1.2 The Company is fully committed to protecting employees, partners, associates, contractual third parties and anyone doing business with our Company from illegal or damaging actions and will address issues proactively and use correct judgement.

2. Purpose

The purpose of this Policy is to encourage a culture of openness and trust and to emphasise the expectations of employees, associates, partners and expectations of any business partners to be treated to fair business practices. This Policy will serve to guide business behaviour and ensure ethical conduct in all our operations.

3. Scope

This Policy applies to all employees, partners, associates, contractual third parties and anyone doing business with our Company.

4. Human Rights

We have a Human Rights policy in place that states we are committed to respecting everyone’s Human Rights in all aspects of our operations. We support the principles set out in the following international standards:

- UN Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- The International Labour Organisation’s Fundamental Conventions

Any concerns regarding Human Rights issues in our organisation can be reported through our confidential Complaints Procedure available on our Website at www.vwa.co.uk.

5. Environmental Issues

Our Policy on Environmental Issues is to reduce the impact of the Company's operations on the environment. We undertake to:

- 5.1 Comply with all applicable environmental legislation and sustainability commitments
- 5.2 Aim to be aware of the carbon footprint of our business activities in conjunction with climate change mitigation
- 5.3 Prevent pollution and reduce consumption of resources through waste management strategies that promote minimisation of waste through re-use, recycling and recovery as appropriate
- 5.4 Incorporate energy efficient measures into the Company's activities and promote efficient energy use in all areas of business activity.
- 5.5 Promote and continue to invest in technologies that provide alternatives to business travel.
- 5.6 Ensure our procurement process takes into account the environment impact of products and services and supports the purchase of sustainable products
- 5.7 Ensure our staff are aware of the environmental impacts of their work activities and encourage them to minimise those impacts through regular awareness training.
- 5.8 Pursue a programme of continuous improvement through regular review of our Environmental Management system.

6. Conflicts of Interest

The Company has a Conflict of Interest Policy in place that applies to all employees, freelance auditors and freelance trainers of the Company and they are required to perform their duties and activities of their position with the highest level of integrity and independence in a professional and ethical manner. They must also ensure that they avoid or eliminate any conflict of interest or situation that could be reasonably perceived as a conflict of interest and immediately report it through the Company's Confidential Complaints Procedure available on our Website.

Our full Conflict of Interest Policy is available on our Website.

7. Information and Confidentiality

The Company complies with current General Data Protection Regulations (GDPR) under the Data Protection Regulations Act 2018 and our data protection principles are detailed in the following documents:

- Privacy Statement published on our Website.
- Data Protection and Ethical Audits Statement published on our Website

8. Bribery and Corruption

Verner Wheelock Associates Ltd is committed to the practice of responsible corporate behaviour and to complying with all laws, regulations and other requirements which govern the conduct of our operations.

The Company is fully committed to instilling a strong anti-corruption culture and is fully committed to compliance with all anti-bribery and anti-corruption legislation including, but not limited to, the Bribery Act 2010 and ensures that no other bribes or other corrupt payments, inducements or similar are made, offered, sought or obtained by us or anyone working on our behalf including our employees, partners, associates, auditors and suppliers.

The Company has a fully documented Anti-Bribery Policy which is available on our Website and all employees, partners, associates and auditors are trained in this Policy and this training is regularly updated.

Any concerns regarding bribery and corruption should be reported to the Company through its Confidential Complaints Procedure that is available on our Website.

9. Code of Conduct

Verner Wheelock Associates Ltd is fully committed to the highest standards of business and ethical behaviour, to fulfilling its responsibilities to employees, associates, auditors, clients, customers and to each other and to ensuring sustainable relationships with all its stakeholders.

The Company has detailed its commitment in a Code of Conduct document which is available on our Website. All employees, associates and auditors have regular training in our Code of Conduct and any breaches will be addressed through our Confidential Complaints Procedure that is available on our Website.

10. Modern Slavery Statement

The Company has a Modern Slavery and Human Trafficking Statement that is detailed on the Company Website www.vwa.co.uk.

This policy has been approved & authorised by:

Name: Alison Wheelock
Position: Managing Director
Date: 04 January 2021
Signature:

