

# ETHICAL BUSINESS PRACTICE POLICY

Constant recognise the importance of retaining its core values and approaches to the process of conducting its business. We recognise the need to create a culture where people make decisions and act in ways which build a sustainable business, meeting our obligations to all our employees, our customers, our suppliers, any other stakeholders with whom we may have dealings and comply with all ethical and legal obligations.

Constant's reputation and the trust and confidence of those with whom it deals are among its most vital of recourses, therefore the protection of these is of fundamental importance. We demand and maintain high ethical standards in carrying out our business activities, underpinned by the five basic principles of **Integrity, Objectivity, Professional competence and due care, Confidentiality, and Professional behaviour.** Corrupt practices will not be tolerated.

# Our relationship with employees

- All employees are treated with full consideration for their basic human rights.
- Constant believe that integrity, honesty, and respect is necessary with all employees to maintain a relationship of mutual trust.
- Employees are not permitted to accept any payments, gifts or hospitality which could be interpreted as bribery.
- Constant encourages its employees to raise any concerns or suspicions that there is any violation of the policy or general treatment of workers in any area of the business.
- We have a culture where employees are encouraged to make suggestions for improvements to any area of the business and we are happy to listen and discuss alternative views and perspectives.
- All employees will be expected to avoid any conflict of interest which could interfere
  with their performance, responsibilities or morale; any potential adverse impact on our
  business; any potential adverse impact on our relationship with our customers,
  suppliers or other stakeholders; any extent to which it may appear improper to an
  outsider.

# Our relationship with customers

- Constant are committed to ensuring all our business is conducted to rigorous, professional, legal, and ethical standards
- Constant believe that integrity is a prerequisite for a successful and sustainable business relationship. This principle governs all aspects of our approach to our customers
- Constant will accord the same level of confidentiality to confidential customer information as it does to its own confidential information.
- Constant will always ensure that it acts truthfully in all its advertising and other public communications. Concealment and overstatement will be avoided.
- Employees must not give money or gifts of significant value, which could be interpreted as a bribe to any customer.

# Our relationship with suppliers

- We are committed to driving and maintaining high standards from our suppliers. Constant expect that the working conditions at our suppliers shall meet the standards of the International Labour Organisation (ILO) and the Universal Declaration of Rights (UDHR)
- Constant acknowledges its responsibility to undertake all reasonable and practical due diligence checks to ensure that our suppliers meet internationally recognised Human rights and labour standards. We will ensure that employment is freely chosen and they:-
  - do not make use of Child labour;
  - do not make use of forced labour;
  - abide by all Health and Safety and hygiene legislation;
  - do not discriminate and there is equality of treatment for all staff;
  - no harsh or inhumane treatment is allowed;
  - ensure working hours are not excessive;
  - pay all employees fairly in line with or above national minimums; and
  - monitor their environmental impact.
- Constant aims to develop a relationship based on mutual trust with all our suppliers.
- Constant will undertake to pay our suppliers within timescales agreed within their terms and conditions
- Constant employees will not accept gifts or favours of significant value which could be interpreted as a bribe and must report any offered to their superior immediately.

# Our relationship with Competitors

- Constant believe that providing a consistently excellent service is the way to enhance our reputation.
- Constant will compete with our competitors vigorously but honestly.
- Constant will not engage in damaging a competitor's reputation, directly, by implication, by misrepresentation or innuendo.

# Anti- Slavery and human trafficking statement:

Constant acknowledge that Modern slavery is a fundamental defiance of human rights and involves exploiting people for commercial gain through forced and compulsory labour, slavery and human trafficking. We have a zero-tolerance approach to modern slavery and are committed to ensuring that there is no modern slavery or human trafficking in any area of the business or in any of our suppliers.

Constant have robust procedures in place to ensure that it complies with its legal and ethical obligations in preventing, detecting and reporting any modern slavery concerns.

This policy will be reviewed on an annual basis in the light of experience and changes to the legal framework.

Designation: Director:

Date: 23<sup>rd</sup> February 2024

CSS 31.8.13

Signed: