



Ethical Business Policy

Code: POL/17

1. Introduction

- 1.1 This document details the Company Policy concerning Ethical Business Practices, and Corporate Social Responsibility.
- 1.2 Ethical business practices establish guidelines for acceptable behavior and mitigates the risk of negative conduct occurring within the organisation.
- 1.3 The Company referred to throughout this document as Ede's is legally registered as Ede's (UK) Limited.

2. Policy Statement

- 2.1 This document explains the ethical business practices that the Company is committed to, it details the main risk areas the Company has in terms of non-ethical practices and gives the approach taken to address these risks.
- 2.2 Our approach to business is guided by commitments to the principles of **leadership, inclusivity, transparency, integrity, stewardship, and continuous improvement**. All business operations and decisions are linked back to these core values to help guide all Ede's employees to make the right decisions and act with integrity.

3. Scope

- 3.1 This policy applies to all Colleagues of the Company Ede's in all entities, regardless of seniority or site. It also extends to anyone working for or on the Company's behalf e.g., those engaged by the Company on a self-employed basis or an agency arrangement. Where reference is made to UK legislation it is expected the equivalent local legislation to be followed in other jurisdictions.
- 3.2 In general, compliance with legislation is the minimum standard for ethical practice. Many features of the Company's operation require the letter and spirit of the law not only to be met but to be exceeded.
- 3.3 The application of this policy includes where the Company's business involves the use of third parties e.g., suppliers; contractors. The Company choose to do business with organisations which have an equal commitment to ethical business. Conversely, Ede's will not do business with those who lack such a commitment.

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4. Risk and Compliance

4.1 Risk Management

Ede's has a risk management committee which is chaired by the Office Manager and consists of representatives from across the business. This committee meets quarterly to review the Company Risk Register, considering the status of current risks and their associated mitigations, and identify any new emerging risks. The risk register and any updates are communicated to the board each quarter.

4.2 Compliance

The Office Manager is responsible for compliance, and Ede's ensures compliance with all applicable laws and regulations including Employment Laws, Health and Safety, and HR by seeking external support from Croner Group Limited for each respective area. Tax Laws as set out by HMRC, and the Companies Act are complied with via the Company's external accountants. The Ede's Legal Register contains current laws and standards applicable to Ede's.

5. Anti-Corruption

5.1 Corruption is the misuse of office or power for private gain.

5.2 Bribery

Ede's will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, with regards to our conduct both at home and abroad. There is a medium risk of bribery at Ede's, through the potential for employees to act favorably towards a client or supplier if rewarded with an incentive. To reduce this risk it is prohibited, directly or indirectly, to offer, give, request or accept any bribe i.e., gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or company in order to gain commercial, contractual or regulatory advantage for the Company, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

5.3 Conflict of Interest

Conflict of interest is an unethical behavior leading to decisions made for the wrong reasons. The Directors of Ede's have a legal obligation under the Companies Act 2006 to avoid conflicts of interest and the Company expect all Colleagues to operate to the same standards, putting others before themselves in all their dealings. Any private, personal, or commercial interests which give rise to such a conflict of interest must be recognised, disclosed appropriately and either eliminated or properly managed. If a person is unsure if they have a conflict of interest,

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then they should first speak with their Line Manager and/or an alternative member of the management team.

5.4 Money Laundering

Ede's does not fall into a high-risk sector, and is not covered by the UK Money Laundering Regulations, having a low risk of being exposed to money laundering. Ede's also chooses not to use or accept cash transactions for any reason, which further lowers the risk of such exposure. However, both the Company and its Supply Chain Partners shall not tolerate breaches of national and international money laundering laws and regulations.

5.5 Fraud

Ede's adheres to the UK Fraud Act 2006, which defines the general offence of fraud and the three ways of committing it:

- false representation
- failure to disclose information
- abuse of position

A person is guilty of fraud if he or she breaches any of these sections. Ede's are vigilant towards and shall not tolerate any form of fraudulent activity and shall investigate and take appropriate action whenever fraud is suspected (whatever its value).

Ede's will continually strive to ensure that all its financial and administrative processes are carried out and reported honestly, accurately, transparently, and accountably and that all decisions are taken objectively and free of personal interest. We will not condone any behavior that falls short of these principles.

6. Anti-Competitive Practices

6.1 Fair competition is beneficial to the raising of standards in products and services and benefits customers through lowering prices and promoting greater choice. Laws that counter anti-competitive practices therefore benefit businesses and consumers.

6.2 Due to the nature and size of Ede's business there is a low risk in terms of anti-competitive practices such as bid rigging and price fixing. Ede's employees have minimal contact with competitors and are not in partnership with competitors in terms of joint buying or selling. Nevertheless, such anti-competitive practice as could take place is guarded against by ensuring that no individual Colleague is ever in a position in which they have sole responsibility for a contractual bid without oversight from others.

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6.3 Ede's shall adhere to and expects its suppliers to adhere to all local and global anti-competition laws, with more specific guidance from the UK, where anti-competitive behavior is prohibited under Chapters I and II of the Competition Act 1998, and Article 101 of EU law. These laws prohibit agreements, arrangements and concerted business practices which prevent, restrict, or distort competition. The laws also prohibit businesses from abusing a dominant market position.

6.4 Ede's do have some long-term contracts with customers and suppliers, where there are contractual obligations. Ede's shall not abuse its bargaining position to impose unreasonable contract terms that are not ethical and have the potential to increase the risk of a breach of ethical business principles. Where possible, Ede's avoids over-dependent relationships by ensuring that our business does not represent more than a small proportion of the total work undertaken by any individual supplier company.

7. Responsible Management of Information

7.1 Information Security

The General Data Protection Regulation (GDPR) applies to organizations operating within the EU and any organizations outside the EU who offer goods or services to businesses or individual customers in the EU. GDPR is the EU's data privacy regulation and protects the "right to be forgotten". Ede's shall ensure information be handled correctly and manage any incident or activity that causes, or may cause, a break down in the availability, confidentiality, or integrity of the physical or electronic information assets of Ede's Group.

7.2 Due to the responsibility Ede's has to manage and handle data appropriately, there is a stand-alone Information Security policy that covers the following:

- Organisation of information security
- Asset management
- Human resources security
- Physical and environmental security
- Equipment security
- Communication and operations management
- Access control
- Information systems acquisition, development, and maintenance
- Incident management
- Business continuity management
- Compliance

Please see the [Information Security Policy \(POL08\)](#) for further detail.

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8. Whistleblowing

- 8.1 To identify areas where non-ethical business behavior is being carried out it is important that employees feel protected to raise concerns about any of the issues set out in this policy.
- 8.2 Employees who have concerns or complaints which may constitute a protected disclosure, as defined, in the first instance should raise these concerns in writing with the employees' Line Manager and/or an alternative member of the management team. Concerns raised will be treated with the utmost confidentiality and will be fully investigated. Further information is available in the [Ede's Whistleblowing Policy \(POL/10\)](#).

9. Responsibility and Reporting

- 9.1 The Board of Directors are accountable for ensuring that Ede's conducts business in an ethical manner that meets the requirements of this Ethical Business Policy, and to provide guidance to the business in terms of areas to focus.
- 9.2 The indicators below are to be reported annually at the end of the Ede's financial year.
- 9.2.1 Percentage of employees trained in anti-corruption and bribery, targeting 100%.
 - 9.2.2 Number of cases of bribery, money laundering, anti-competitive behavior, and/or fraud, targeting zero cases.
 - 9.2.3 Percentage of business functions covered by the Ede's anti-corruption risk assessment.
 - 9.2.4 Review of information security aligned to external standards carried out annually.
 - 9.2.5 Number of data security breaches, targeting zero.

10. Policy Monitoring

- 10.1 This policy is not intended to be contractual and can be amended or withdrawn at any time.
- 10.2 This policy supersedes any previous agreements and/or documents previously communicated.
- 10.3 The policy will be monitored to confirm that the above arrangements are being adhered to in all areas.

11. Change Control

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Version No	Page No	Date	Brief detail of changes
1		05/03/2024	Document created. Replaces and adds to historical policies: anti-fraud (POL02), anti-bribery (POL01) and CSR (POL03).

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