

CODE OF CONDUCT AND ETHICS POLICY

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1. INTRODUCTION

The code of conduct and ethics policy is a critical aspect of our commitment to conducting business with integrity and honesty. Aim Solutions recognises that ethical behaviour is not only a legal and regulatory requirement but is also a vital component of our corporate responsibility to our stakeholders, including our employees, customers, and the communities we serve.

This code of conduct and ethics policy sets forth our expectations for all employees, officers, and directors regarding ethical behaviour, compliance with applicable laws and regulations, and the protection of our company's assets and reputation. It also serves as a guide for making ethical decisions in the workplace, addressing conflicts of interest, maintaining confidentiality, and reporting any concerns or violations of the policy.

We take this policy very seriously and expect all employees to do the same. We are committed to providing a workplace environment that fosters integrity, fairness, respect, and accountability. Our goal is to create a culture of ethics that permeates throughout our organisation and is reflected in our business practices and relationships with all stakeholders.

We encourage all employees to review this policy carefully and to seek guidance from their supervisors if they have any questions or concerns. By working together to uphold our code of

conduct and ethics policy, we can continue to build and maintain the trust and respect of our stakeholders, enhance our reputation, and achieve long-term success.

2. WHO THIS CODE APPLIES TO

The code of conduct and ethics policy applies to all employees, officers, and directors of the company, regardless of their position or level within the organisation. This includes full-time, part-time, temporary, and contract workers. The policy also applies to any third-party contractors, vendors, or partners who work with or on behalf of the company. All individuals who fall under the scope of the policy must adhere to its principles and guidelines in their daily activities and interactions within and outside the company. By doing so, they demonstrate their commitment to upholding the company's values and promoting ethical behaviour.

This Code does not form part of any contract of employment or contract to provide services and we may amend it at any time.

3. **RESPONSIBILITY**

The Director has primary and day-to-day responsibility for implementing this Code, monitoring its use and effectiveness, dealing with any queries about it and auditing internal control systems and procedures to ensure they are effective in managing ethics and conduct on behalf of Aim Solutions.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this Code and are given adequate and regular training on it and the issues covered by it.

4. WORKPLACE ENVIRONMENT

4a. Diversity, equity and inclusion

We value and respect individual differences, including race, ethnicity, gender, age, religion, sexual orientation, disability, and other characteristics. We strive to create a workplace that is free from discrimination, bias, and prejudice, where all employees are treated with dignity and respect.

4b. Discrimination, harassment and bullying

We are committed to providing a workplace that is free from any form of discrimination or harassment, including sexual harassment, racial harassment, and other types of harassment or bullying. All employees are expected to treat others with respect and to report any instances of discrimination, harassment, or bullying.

4c. Health and wellbeing

We encourage employees to prioritise their physical and mental health. We also provide resources and support to help employees maintain a healthy work-life balance.

4d. Workplace violence

Our company has a zero-tolerance policy for workplace violence. Any acts of violence or threats of violence will not be tolerated, and appropriate action will be taken.

4e. Drugs and alcohol

We expect all employees to be free from the influence of drugs and alcohol while on the job, and we provide resources and support for employees who may be struggling with substance abuse or addiction.

5. BUSINESS PRACTICES

5a. Conflicts of interest

All employees must avoid any conflicts of interest that may arise between their personal interests and the interests of the company. If such a conflict arises, the employee must disclose it to their supervisor or the designated reporting mechanism and recuse themselves from any decision-making related to the matter.

5b. Competition

Our company is committed to fair and open competition in the marketplace. We comply with all applicable laws and regulations governing competition, including antitrust laws, and we do not engage in any behaviour that may be considered anticompetitive or illegal.

5c. Bribery and corruption

Our company does not tolerate any form of bribery or corruption. We comply with all applicable laws and regulations governing bribery and corruption, including the UK Bribery Act, and we do not engage in any behaviour that may be considered corrupt or unethical.

5d. Gifts and hospitality

Our company has a strict policy regarding gifts and hospitality. We do not accept or offer any gifts, entertainment, or hospitality that may influence or be perceived to influence business decisions.

5e. Anti-money laundering

Our company is committed to preventing money laundering and the financing of terrorism. We comply with all applicable laws and regulations governing anti-money laundering.

5f. Slavery, human trafficking and child labour

Our company is committed to preventing slavery, human trafficking, and child labour in our operations and supply chain. We comply with all applicable laws and regulations governing these issues, including the UK Modern Slavery Act, and have established policies and procedures to ensure compliance.

5g. Environmental operational compliance

We have established policies and procedures to ensure compliance with environmental standards and to promote sustainability.

6. COMPANY ASSETS AND INFORMATION

6a. Intellectual property

All employees must respect and protect the company's intellectual property rights, including trademarks, copyrights, patents, and trade secrets.

6b. Confidential information

All employees must maintain the confidentiality of the company's proprietary and confidential information, including customer data and financial information. Employees may only share confidential information on a need-to-know basis and with appropriate authorisation.

6c. Data protection

Our company complies with all applicable data protection laws and regulations, including the General Data Protection Regulation (GDPR). We have established policies and procedures to protect personal data from unauthorised access, use, disclosure, and destruction.

6d. Use of information and communication systems

Our company's information and communication systems are provided for business purposes only. Employees must not engage in any behaviour that may compromise the security or integrity of these systems.

6e. Use of devices

Employees who use company-provided devices, such as laptops and mobile phones, must use them responsibly. Employees must not use these devices to access inappropriate content, engage in illegal activities, or compromise the security or integrity of the company's systems.

6f. Records management

Our company maintains accurate and complete records of our business activities, including financial records, contracts, and other documents.

6g. Contract authorisation

All employees must obtain proper authorisation before entering any contracts on behalf of the company. Contracts must be reviewed and approved by the appropriate parties to ensure compliance with company policies and applicable laws and regulations.

6h. Social media

Employees must use social media responsibly and with respect for the company's reputation and brand. Employees must not disclose confidential information or engage in behaviour that may damage the company's reputation.

6i. Competitive information

Employees must not disclose or use any confidential information related to our competitors, including pricing, marketing strategies, and development plans.

7. COMMUNITY INVOLVEMENT AND SOCIAL RESPONSIBILITY

7a. Human rights

We do not tolerate any form of human rights abuses or discrimination and ensure that our operations comply with all applicable laws and regulations.

7b. Charitable and political activity

Our company encourages and supports charitable activities and political participation by our employees. However, we do not engage in political activities or contributions as a company. Employees must avoid any conflicts of interest between their charitable or political activities and their work at the company.

7c. Volunteering

Our company supports and encourages employee volunteering for charitable causes and community involvement.

7d. Environmental action and sustainability

We seek to minimise our environmental impact and promote sustainable practices in our operations. We comply with all applicable environmental laws and regulations and promote environmental awareness and responsibility among our employees.

8. YOUR RESPONSIBILITIES

As an employee, you have a responsibility to uphold the principles and guidelines set forth in the code of conduct and ethics policy. This includes, but is not limited to:

- Reporting any concerns you have that a breach of this Code may have occurred to your line manager or director.
- Co-operating with any investigation that Aim Solutions undertakes.
- Seek help or advice from your line manager or director if you have questions about any aspects of the Code.
- Understanding and complying with specific laws and regulations that apply to your specific role.
- Completing any mandatory associated training that is offered to you.

9. CONTACT US

Questions, comments and requests regarding this code of conduct and ethics policy are welcomed and should be addressed to Aim Solutions inbox at <u>team@aimsol.co.uk</u>.