CITY & ESSEX

2026

Code of Ethics & Business Conduct **Policy**

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Effective Date:	October 2026	Review Date:	October 2027

1.MISSION STATEMENT

City & Essex is committed to conducting business honestly, fairly and responsibly. We expect our people and business partners to act with integrity, comply with applicable laws, protect the interests of clients and colleagues, and raise concerns where conduct falls below the standards expected of City & Essex.

This policy sets out our overarching commitments on ethical conduct, anti-bribery and corruption, fraud prevention, money laundering, tax evasion, conflicts of interest, gifts and hospitality, fair business relationships, confidentiality and speak-up protections. It is intended to sit above the detailed procedures, controls and reporting routes used across the business.

2. SCOPE

This policy applies to City & Essex Limited and all affiliated subsidiaries. It applies to employees, workers, agency workers, directors, managers, supervisors, contractors, consultants and anyone working on behalf of City & Essex, where relevant to their role or contractual relationship.

- Head Office, management and support functions.
- Site-based employees and operational teams working across client locations.
- Managers, supervisors, budget holders, finance colleagues, procurement decision-makers and employees involved in client, supplier or commercial relationships.
- Work-related events, client meetings, supplier engagement, tenders, contract discussions, procurement decisions, financial transactions and company communications.
- Supplier and subcontractor expectations are also supported by the Supplier Code of Conduct, Sustainable Procurement Policy, Modern Slavery & Human Rights Policy and relevant contractual requirements.

3. RELATIONSHIP WITH EXISTING PROCEDURES

This policy consolidates City & Essex's top-level business conduct expectations and should be read alongside relevant finance, HR, procurement, whistleblowing, disciplinary, responsible information management, data protection and supplier management procedures. City & Essex's information security controls are also supported by ISO 27001-aligned arrangements. Any ISO 27001 certification evidence used externally will be checked for current validity, scope, certification body and accreditation status before submission.

It supersedes the previous Anti-Fraud Policy as the top-level business ethics policy, subject to final internal approval. Existing detailed procedures or controls relating to anti-money laundering, tax evasion, bribery, fraud reporting, financial controls, investigations, disciplinary action and whistleblowing remain in force unless separately updated.

4. FRAMEWORKS & LEGISLATION

This policy is informed by applicable UK law and recognised responsible business principles, including where relevant:

- Bribery Act 2010.
- Fraud Act 2006.
- Criminal Finances Act 2017, including prevention of criminal facilitation of tax evasion.
- Proceeds of Crime Act 2002 and UK money laundering requirements where relevant to City & Essex activities.
- Companies Act 2006 directors' duties and responsible governance principles.
- Public Interest Disclosure Act 1998 and whistleblowing protections.
- Data Protection Act 2018 and UK GDPR, where confidentiality or responsible information handling is relevant.
- Modern Slavery Act 2015, where ethical labour, supplier conduct or exploitation risks may be relevant.
- Competition Act 1998 and fair competition principles, where relevant to business relationships.
- UN Global Compact Principle 10 on anti-corruption, where relevant to responsible business conduct.
- City & Essex Whistleblowing Procedure, Supplier Code of Conduct and Sustainable Procurement Policy.

5. POLICY COMMITMENTS

1. Integrity, Honesty and Lawful Conduct

City & Essex expects all employees, workers and representatives to act with honesty, professionalism and integrity. Business decisions must be made lawfully, transparently and in the best interests of City & Essex, its clients and stakeholders.

Employees must not knowingly engage in, support, ignore or conceal unlawful, dishonest, unethical or improper conduct.

2. Anti-Bribery and Corruption

City & Essex has zero tolerance for bribery, corruption, facilitation payments or improper inducements. Employees and representatives must not offer, give, request or accept anything intended to improperly influence a business decision, secure an unfair advantage or compromise professional judgement.

Any suspected bribery, corruption or improper payment must be reported promptly through management, HR, finance, whistleblowing or other appropriate reporting routes.

3. Fraud Prevention

City & Essex will take reasonable steps to prevent, detect and respond to fraud, attempted fraud, false accounting, misuse of company assets, false claims, dishonest expense reporting, procurement manipulation, invoice fraud and any other dishonest activity.

Managers, finance colleagues, budget holders and employees involved in procurement, payroll, invoicing, expenses or supplier management must follow relevant controls and escalate concerns promptly.

4. Anti-Money Laundering and Tax Evasion

City & Essex is committed to preventing money laundering, terrorist financing and the criminal facilitation of tax evasion. Employees must not knowingly assist, enable or ignore suspicious financial activity, false documentation, unusual payment requests, tax evasion or arrangements designed to conceal the source, destination or legitimacy of funds.

Relevant employees must follow finance, due diligence, record-keeping and escalation procedures where suspicious activity, unusual transactions or tax-evasion risks are identified.

5. Conflicts of Interest

Employees and representatives must avoid situations where personal interests, relationships, outside activities or financial interests could conflict with their responsibilities to City & Essex. Actual, potential or perceived conflicts of interest must be declared promptly to an appropriate manager or senior leader.

Conflicts may include personal relationships with suppliers or clients, outside employment, gifts or benefits, financial interests, family connections, or involvement in decisions where impartiality could reasonably be questioned.

6. Gifts, Hospitality and Business Courtesies

Gifts, hospitality, entertainment or other business courtesies must never be used to improperly influence business decisions. Any gift, gratuity, hospitality or entertainment expenditure over £100 must be authorised in advance by a Director and all gifts must be declared in line with City & Essex procedures.

Employees must not request gifts or hospitality. Cash gifts are prohibited at any value, gifts must not be received at home addresses, and any offer that appears excessive, unusual, frequent, linked to a tender or contract decision, or capable of creating a perceived obligation must be escalated. City & Essex will maintain declaration records for gifts, hospitality and conflicts where required.

7. Fair Competition and Responsible Business Relationships

City & Essex will compete fairly and will not knowingly engage in anti-competitive, misleading or improper business practices. Employees must not exchange commercially sensitive information with competitors, coordinate bids, manipulate tenders, misrepresent services, or act in a way that undermines fair competition.

Client, supplier and partner relationships should be based on transparency, fairness, professionalism and compliance with contractual and legal obligations.

8. Confidentiality and Responsible Information Handling

Employees and representatives must protect confidential, commercial, personal and client information. Information must only be accessed, used, shared or retained where there is a legitimate business reason and in line with applicable data protection and information management procedures.

Information must not be used for personal gain, disclosed without authority, shared inappropriately through social media or messaging platforms, or entered into unauthorised systems.

9. Supplier and Business Partner Conduct

City & Essex expects suppliers, subcontractors and business partners to operate ethically and in line with applicable laws. Supplier requirements are set out in the Supplier Code of Conduct and include expectations on business integrity, health and safety, human rights, environmental responsibility, fair labour practices and ESG data where relevant.

Where serious or repeated non-compliance is identified, City & Essex may require corrective action, review the relationship or terminate the relationship where appropriate.

10. Speaking Up, Investigation and Non-Retaliation

City & Essex encourages employees and workers to raise concerns about unethical, unlawful, unsafe or improper conduct. Concerns may be raised through line management, HR, finance, the Whistleblowing Procedure or other appropriate routes.

Concerns will be handled seriously, sensitively and, where possible, confidentially. Retaliation, victimisation or detrimental treatment of anyone who raises a concern in good faith will not be tolerated.

6. TARGETS AND MEASUREMENT

City & Essex will use 2024 as its ESG baseline year unless a more specific baseline is stated.

Area	Baseline / Context	Target	Deadline
Ethics reporting routes	Whistleblowing, HR, management and dedicated confidential reporting routes in place	Maintain accessible reporting routes for fraud, bribery, corruption, money laundering, tax evasion, conflicts of interest, unethical conduct and retaliation concerns, including the HR portal Confidential Reporting Form	Ongoing
Gifts and hospitality	£100 Director authorisation threshold exists in employee standards guidance	Maintain gifts, hospitality and conflict declaration arrangements for directors, managers, finance, procurement, commercial and relevant client-facing roles	End 2026

Area	Baseline / Context	Target	Deadline
Higher-risk role training	Finance, procurement, commercial, management and budget-holder roles carry higher ethics exposure	Assign or deliver business ethics, anti-bribery, fraud prevention or whistleblowing awareness to employees in higher-risk roles	End 2026
Supplier conduct	Supplier Code of Conduct created in 2026	Review supplier and subcontractor business conduct expectations through the Supplier Code of Conduct and sustainable procurement processes	Annual

City & Essex will not publish sensitive investigation details, confidential employee information or legally privileged material. Reporting will be aggregated and proportionate where used for ESG, EcoVadis, client assurance or management review purposes.

7. RESPONSIBILITIES

Managing Director

The Managing Director has ultimate accountability for this policy and for ensuring that ethical conduct, lawful business practice and responsible governance remain part of City & Essex's business approach.

Finance Director / Finance Lead

The Finance Director or relevant Finance Lead acts as the responsible senior finance role for anti-money laundering escalation and is responsible for supporting financial controls, anti-fraud controls, anti-money laundering considerations, tax-related controls, escalation of suspicious financial activity and accurate record-keeping.

Head of People & Culture

The Head of People & Culture supports this policy through employee communication, conduct management, disciplinary procedures, grievance routes, investigation support, whistleblowing processes and protection from retaliation.

Head of ESG
The Head of ESG supports this policy by aligning business ethics evidence with EcoVadis, client assurance, supplier conduct expectations, sustainable procurement and responsible business reporting where relevant.

Managers, Supervisors and Budget Holders
Managers, supervisors and budget holders are responsible for leading by example, applying controls fairly, declaring conflicts, escalating concerns, avoiding retaliation and ensuring employees understand relevant conduct expectations.

Employees, Workers and Contractors
Employees, workers and contractors are expected to act honestly, comply with this policy, protect confidential information, declare conflicts, avoid improper gifts or inducements and report concerns in good faith.

Suppliers and Business Partners
Suppliers and business partners are expected to comply with applicable laws and City & Essex's supplier conduct expectations. These expectations are set out in the Supplier Code of Conduct and related procurement documents.

8. SUPPORTING EVIDENCE

This policy sets out City & Essex's overarching commitments, responsibilities and objectives. It is supported by relevant procedures, controls, records, reporting routes, supplier documents and statutory obligations. Supporting documents and evidence may include:

- Anti-fraud, financial control or investigation procedures.
- Anti-money laundering and tax evasion procedures where retained by Finance.
- Bribery and corruption guidance.
- Whistleblowing Procedure.
- Disciplinary, grievance and confidential reporting procedures.
- Gifts, hospitality and conflict of interest declarations or registers where maintained.
- Supplier Code of Conduct and Sustainable Procurement Policy.
- Social Events, Social Media, Computer & Internet and Data Protection policies where relevant to conduct and confidentiality.
- Training, induction or communication records relating to ethics, fraud, bribery, whistleblowing or responsible business conduct.
- Aggregated concern, investigation or corrective action records where available and appropriate.

These supporting documents provide the detailed controls used to implement this policy in day-to-day operations.

9. REPORTING AND REVIEW

This policy will be reviewed annually, or sooner where required by legislation, client requirements, EcoVadis reassessment, material operational changes, investigation findings, internal control reviews or changes to reporting arrangements.

Ethics and business conduct performance will be reviewed through relevant management review, finance controls, HR processes, whistleblowing or concern records, supplier governance and ESG evidence review where appropriate. Material concerns will be escalated to senior leadership in line with internal procedures.

Business Name: **City & Essex Ltd**
Approved and Signed By: **Ian Hookway, Managing Director**
Approval Date: **October 2026**

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