

Ethical business code of conduct

Policy Statement

Everything Managed Group is committed to doing business with a high degree of integrity and transparency dependent on a culture in which everyone feels comfortable and empowered to report instances of non-compliance including suspected illegal or unethical conduct.

- We will not tolerate illegal or corrupt activity
- We expect behaviours by individuals to demonstrate good practice and respect to others in all their actions
- We will report and properly deal with any instances of fraud, misconduct or wrongdoing by workers or officers of any Group business
- We are absolutely committed to preventing slavery and human trafficking in our corporate activities and to ensuring that our supply chains are free from slavery and human trafficking
- It is not acceptable to accept or offer gifts or hospitality in circumstances where it could influence, or be seen to influence, business actions or decisions
- We will encourage the raising of concerns about any behaviours or malpractice without fear of reprisal and will investigate as necessary
- We will take the appropriate steps to ensure that all personal data is processed fairly and lawfully with the appropriate systems and controls are in place to ensure the security of this data

Scope

All people employed within a Group business in any capacity and at any level of seniority.

All third parties and supply chain partners who perform services for and on behalf of Everything Managed Group. We expect those parties to abide by the provisions of this policy or alternatively have in place equivalent policies.

Group Business Obligations

Each Group business will:

- Have policies and procedures in place to operate the business within the parameters of the Everything Managed Group policy
- Provide suitable and sufficient resources to enable the policy to be implemented
- Provide employees with adequate training, information and instruction to ensure they can act within the policy parameters
- Be able to demonstrate compliance with this policy
- Notify the Board of any issues or complaints which may have an impact on the reputation or standing of the individual Group business or Everything Managed Group as a whole

Indicative Policies/Procedures/Codes of Conduct

EMG-POL-ETH-001 Anti-Bribery, Anti-Corruption and Corporate Criminal Offences Policy

EMG-POL-ETH-002 Ethical business code of conduct



Damon Smith – Chief Executive Officer, January 2023 (reviewed annually).