 <p><b>SHEPLEY GROUP</b></p> <p><b>CODE OF ETHICS POLICY</b></p>	<p><b>MM0.0CompanyRecord15</b> REF: S0716 ISSUED: 25.05.2018</p>
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## 1. SCOPE

This policy applies to all employees of the Shepley Group incorporating Shepley Engineers Ltd (SEL), West Cumberland Engineering Ltd (WCEL), PPS Electrical Engineering Ltd (PPS).

## 2. INTRODUCTION

Integrity, professionalism, honesty and respect whether personal or organisational are indispensable in the commercial environment & are essential requirements for any organisation in order to grow and ensure profitability and continuing business success.

Accordingly, commercial and contract management requires a clear policy statement and a specific set of values relative to professional ethics in order to earn and maintain the confidence of both customers and the supply chain. This code of ethics is promulgated as such guidance for all personnel involved directly or indirectly in organisational activities.

## 3. PRINCIPLES

A primary responsibility for all employees is compliance and enforcement of this policy.

No one with a personal or organisational conflict of interest may participate in any way in the formation or administration of a contract.

All companies seeking procurement work from the organisation shall be treated fairly and equitably and their intellectual property shall be protected and used only for the purposes intended by its owner.

All personnel involved in any way in the contracting process shall comply with all amicable laws, regulations and directives as well as their specific contractual obligations.

The integrity of the commercial processes shall never be tainted by any real or perceived improper activities.

## 4. BRIBERY & CORRUPTION


In accordance with the legislation terms of the UK Bribery Act no individual(s) will offer, promise or give a financial or other advantage to another person(s) with a view to inducing a person(s) to perform improperly a relevant function or activity or reward a person(s) for the improper performance of their activity.

## 5. PERSONAL CONFLICT OF INTEREST

All personnel involved in a procurement transaction must disclose any actual or potential conflict of interest which could exist or perceive to exist to their relevant management.

Interest which might create personal conflict of interest includes but is not limited to the following:

- Ownership of stock in potential a competitor, actual competitor, or contractor.
- Marriage to or cohabitation with an officer or employee of a potential competitor, actual competitor or contractor.
- Indebtedness to a potential competitor, actual competitor or a contractor.
- Receipt of compensation from a potential competitor, actual competitor or contractor.

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If a conflict of interest is determined, the disclosing person will be directed to remove themselves from any further involvement in the specific process.

All commercial and contract management personnel with the potential for influencing a procurement transaction in any way shall inform their relevant management. A view will be determined as to whether the activities should be re-directed.

Disclosure of potential personnel conflict of interest shall *not* result in any adverse action against the individual(s).

## **6. EQUITY & FAIRNESS IN CONDUCT OF COMPETITION**

No preference or advantage shall be afforded to any contractor or potential contractor. Similarly no prejudice against any contractor or potential contractor shall be tolerated. Examination of documented contractor performance information is not considered preference or prejudice.

Specifications or requirements must not be biased in favour of any particular contractor or potential contractor.

Implying large quantities to influence price, when knowing that the actual order will be smaller is not permitted.

Wording of invitations for tenders, other solicitations or specifications or statements of work in a vague way to intentionally induce misinterpretation or errors in proposals are unethical and prohibited.

Solicitation of proposals from suppliers known to be unqualified for the award with intent to create the illusion of competition is dishonest and is not permitted.

Solicitation of other proposals to create competitive pressure on a certain sole source supplier is prohibited.

Bid or proposal information from one proposal may never be shared with another contractor or potential contractor even if either of the competitors has been eliminated from the competition.


No criticism of one potential source should be communicated to another contractor or potential contractor nor should the strengths or weaknesses of a contractor or potential contractor to be disclosed to any organisation whether competing or not.

## **7. CONFIDENTIALITY AND PROTECTION OF INTELLECTUAL PROPERTY**

Information submitted by competitors or proposers is the property of the entity that submits the information and must be protected from disclosure to personnel or firms not authorised to be involved in the evaluation of proposals.

All such property submitted shall be controlled as dictated within the contractual obligations.

Copyrighted or patented information shall never be reproduced without the express written authorisation of the owner.

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## 8. HOSPITALITY & GRATUITIES

In order to avoid being misconstrued as consideration for special treatments or as an attempt to positively influence their attitudes or decision making personnel should not give or accept hospitality which contravenes the UK Bribery Act.

It is recognised that the giving and receiving of tokens of appreciation is a fundamental part of building good business relationships and maintaining understanding and goodwill.

No individual(s) shall request, agree to receive, anticipate or accept a financial or other advantage with the specific intention of performing a function or business activity improperly either directly or via a 3rd party.

No individual(s) will offer, promise or give financial or other advantage to another person(s) where that individual(s) believes that the acceptance of the advantage would itself result in an improper performance of a relevant function or activity.

## 9. FACILITATION PAYMENTS

A facilitating payment is a certain type of payment to foreign officials which is not considered to be bribery according to legislations of some states but may be construed as bribery within the UK and as such is in opposition to the UK Bribery Act. It is therefore against company policy to authorise such payments without the consultation of the legal department.

## 10. GOVERNMENT EMPLOYEES

No gift or hospitality whatsoever is to be offered to any government or local government official without the express approval of the Managing Director who will take steps to ensure that no governmental or statutory practise is being breached.

## 11. SUB-CONTRACTORS, CONSULTANTS & AGENTS

Any sub-contractor, consultant or agent operating on behalf of the company will be expected to fully comply with this policy.

## 12. WHISTLEBLOWING

Whistleblowing is when an individual reports suspected wrongdoing at work. Officially this is called 'making a disclosure in the public interest'.



Individuals can report issues that aren't right, are illegal or if anyone at work is neglecting their duties, including:

- someone's health and safety is in danger
- damage to the environment
- a criminal offence
- the company isn't obeying the law (like not having the right insurance)
- covering up wrongdoing

Confidentiality is paramount and individuals will be treated with the utmost discretion.

All issues will be investigated.

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