

Ethical Business Policy for

# Treleigh Holdings Ltd

Overall and final responsibility for Ethical Business

is that of.

James Gazzard

Group Managing Director

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The Company Treleigh Holdings Ltd is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and internationally. Every employee and individual acting on the Company's behalf is responsible for maintaining the Company's reputation and for conducting company business honestly and professionally.

This policy outlines the Company's position on prohibiting and preventing bribery, fraud, dishonesty and illegal activity. The Company's directors and Management team take a zero tolerance approach and are committed to enforcing effective systems throughout the company to prevent, monitor and eliminate any form of dishonesty and consider that such activities have a detrimental impact on the business by undermining good governance and distorting free markets.

This policy applies to all employees of the company, and to temporary workers, consultants, contractors, acting for, or on behalf of, the Company within the UK and internationally. Every employee and associated person acting for, or on behalf of, the Company is responsible for maintaining the highest standards of business conduct. Any breach of this policy can be treated as grounds for serious disciplinary action, and /or constitute a contractual and criminal matter for the individual concerned. The company is committed to transparency and believes that fair conduct helps to foster deep relationships of trust between the Company and our business partners and customers and as such a breach of this policy may cause serious damage to the reputation and standing of the Company.

In compliance with statutory legislations and to embed commitment to integrity and honesty the Company will not approve the following:-

- Give or offer any payment, gift, hospitality, or other benefit in the expectation that a business advantage will be received, or to reward any business received.
- Accept any offer from a third party that is known or suspected to be made with expectation that the Company will provide a business advantage for their business or anyone else.
- Give or offer any payment to a Government official in any country to facilitate or speed up a routine or necessary procedure.
- Tangible assets and intangible assets such as computer systems, bespoke processes, software, intellectual property and confidential information shall not be used for unauthorised or unlawful purposes or for personal gain.
- Engage in any business practice which is unethical or amounts to unfair competition.
- Unlawfully or inadvertently acquire, use or disclose to any third party any propriety information or intellectual property of another party.
- Make false statements about a competitor's products and/or services.
- Engage in business with service providers, agents or representatives that do not support our ethical business objectives.

The success of the Company's measures depend on all employees, and those acting for the Company, playing their part in helping to detect and eradicate dishonesty. Therefore, all employees and others acting for, or on behalf of, the Company are encouraged to report any suspected dishonesty in accordance with the procedures. The Company will support any individuals who make such a report, if it is made in good faith.

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We regularly review and update our ethical business policy to ensure that we are meeting our commitments and making a positive impact maintaining Company's reputation and business honesty. Further this policy will be made freely available to all interested parties. We welcome feedback regarding our ethical business performance and seek to continuously improve our practices.

Signed.......... Dated.....18/05/23.....

(Name and Role within Company)...James Gazzard Group Managing Director.....

Dated 17<sup>th</sup> May 2023

Next review date: 17<sup>th</sup> May 2024