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Ethical Standards Policy

Statement of Policy

All TQC employees are expected to maintain high standards of integrity, honesty and fair dealing and to conduct themselves at all times so as to avoid actions which may adversely impact the interests or good standing of TQC or any associated companies.

General Principles

- 1. All business must be conducted with respect for human dignity and rights and in accordance with the laws and regulations of all other countries in which TQC does business.
- 2. Corrupt practices of any kind will not be tolerated and no bribes or similar payments are to be made to or accepted from any party.
- 3. All commercial transactions (including payments and benefits) must be properly and accurately recorded.
- 4. Company assets and confidential information must be fully protected in accordance with established procedures. In particular such assets and information must only be used for the purposes for which provided or supplied (where supplied by a customer or third party) and must not be used by employees for personal gain.
- 5. Employees must be made aware of and avoid conflicts of interest in their business relationships and personal activities. Possible conflicts could arise from areas including issues of share ownership, direct or indirect personal interest in contracts, seeking or accepting gifts or entertainment, employment with another organisation or use of confidential information.
- 6. Facilitation payments, made to facilitate or speed up official or governmental procedure or actions, are likely to be considered as bribes. Consequently such payments should not be made unless specifically permitted under the applicable local laws or regulations. Any such prohibited payments which are made under any form of duress must be promptly reported to a Director of TQC.

Practice

Any Director is available for the purposes of:

- 1. advising and assisting employees whenever ethical questions arise and overseeing compliance with the Ethical Standards Policy,
- 2. determining whether or not a conflict of interest exists in a given situation.

TQC employees are to report possible conflicts to a Director of the Company.



It is the responsibility of each employee who thinks that any action which he or she has taken, or is instructed to take, might result in a breach of ethical principles or a conflict of interest, or who becomes aware of a situation which raises a reasonable question of such breach or conflict, to report the facts to his or her manager.

All invitations to accept a bribe or any proposal or suggestion of such a nature must also be reported immediately to a Director of the Company.

Employees

We are committed to:

- 1. Developing a workforce where there is mutual trust and respect, free from bullying and harassment, where every person feels responsible for the performance and reputation of our company.
- 2. Recruiting, employing and promoting employees on the basis of objective criteria and the qualifications and abilities needed for the job to be performed in line with our Equal Opportunities Policy.
- 3. Maintaining good communications with employees through our information and consultation procedures.
- 4. Providing our employees with suitable training and assisting them in realising their potential.
- 5. Ensuring the privacy and confidentiality of our employees' personal information is respected.
- 6. Suitably rewarding our employees for their contribution to the success of the business.
- 7. Providing mechanisms whereby employees can raise legitimate concerns confidentially regarding malpractice and insuring no one will be victimised for a report made in good faith.
- 8. Providing employees with the appropriate information and training to comply with this Code and the associated policies
- 9. Seeking to protect our employees from third party abuse that might be injurious to their safety, health or well-being.

Political Activity

TQC does not make any donations to political parties or take part in party politics. However, when dealing with Government we do make legitimate concerns known and will seek to influence Governments in relation to issues that could affect us, our members, our customers or the local community. These relationships are conducted in accordance with this Code.

Health and Safety

- 1. We are committed to creating and maintaining a safe and healthy working environment for our employees, customers and the community.
- 2. Our commitment to ensuring the safety and security of our employees is set out in our Staff Handbook.
- 3. We strive to avoid emergency situations but recognise the need to be prepared.
- 4. We are committed to having effective emergency response procedures in place.

The Environment

- 1. TQC is committed to making continuous improvement in the management of its environmental impact.
- 2. All employees are expected to adhere to the requirements of our environmental management system and support the improvement in our environmental performance.



Customers

TQC is committed to providing safe, value for money, high quality, consistent, accessible and reliable services to its customers. All employees are expected to behave respectfully and honestly in all their dealings with customers and the general public in accordance with the principles set out in this Code.

In particular we will safeguard and protect the welfare of vulnerable people who come into contact with our employees. Employees will be made aware that they hold a position of trust and that they must at all times maintain the highest standards of personal conduct that reflects this trust being placed with them.

Supply Chain

- 1. We purchase a wide range of goods and services required in the operation of our business and we also rely heavily on a number of key suppliers for the delivery of our core services. Good working relationships with our suppliers are therefore central to the success of our business.
- 2. Whilst we are committed to obtaining and retaining competitive goods and services we will at the same time seek to ensure they are from sources that have not jeopardised human rights, safety or the environment.
- 3. We expect our suppliers to adhere to business principles consistent with our own.
- 4. We expect them to adopt and implement acceptable safety, environmental, product quality, product stewardship, labour, human rights, social and legal standards in-line with our Code of Conduct.
- 5. We will seek to work with our suppliers to develop long-term meaningful relationships to benefit both parties with the aim of improving the quality, environmental performance and sustainability of goods and services.

Community Involvement

Our operations touch members of the community daily, whether as customers, neighbours, employees, businesses or residents. We are committed to fostering good relationships with the communities in which we work and building community partnerships that deliver positive change.

Labour Principles

TQC requires Employees and Suppliers to abide by the following:

We will not employ workers under the legal minimum age for admission to work stipulated by the laws of the countries where we work, generally the minimum age for admission to employment is considered by TQC to be 16 years of age.

TQC will not make any use of forced labour, including prison or debt-bondage labour. We will not require the lodging of deposits or identity papers, either by our Company or agencies providing employees.