The way we work.

Our Code of Business Conduct

CAMPIONS

Our Code of Business Conduct

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Managing Director

Keith Shields

Our vision sets out our commitment to build lasting relationships with every customer, therefore how we deliver our services is just as important.

Ensuring we follow the highest standards of business practice is the only way we can secure the trust and confidence of everyone we deal with.

I want Campions to be a business that operates to the highest standards of integrity, honesty and transparency at all times. In delivering services to our customers, Campions relies on its suppliers, as well as its own people, and it is important that everyone who represents us operates to these standards.

If you work for us, or on our behalf, you need to know what we expect of you and what you can expect from us. The purpose of this Code of Business Conduct is to make that clear and I expect everyone to follow it. There are more detailed policies that support the principles set out in this Code, but if you are unsure at any time what it means for you, please ask for advice.

By following this Code, together, we will all be able to say that we are proud to work for Campions.

Who is this Code for?

This Code is for everyone who works at Campions and for those who work with us and for us.

Whether you are an employee, a contractor or sub-contractor, or a supplier, we want you to always act in the most appropriate way. This code is designed to make sure that the work you do meets the highest standards of integrity and business ethics. It is also designed to help you comply with the laws and regulations applicable to our business.

We require our managers to lead by example and be role models for their teams. We strive for our employees and suppliers to feel able to report problems and concerns so that we can continually learn and improve.

We want you to be aware of how your actions will affect others and how they might impact your and Campions's reputation. We want you to be proud of the decisions you make at work.

If you are in any way unsure about this Code, please ask for advice. You can find information on how to raise questions and concerns in section 12 of this document.

Section 1.

We work safely wherever we are

We require those who work with us and for us to ensure their own health and safety and the health and safety of others, to ensure working conditions for their employees are safe and to take adequate steps to prevent accidents and injuries.

We are committed to providing a safe working environment. This applies when we are working in one of our offices, within properties, on developments, attending viewings and anywhere else. Safety does not just mean preventing accidents; it covers all other potential risks. e.g fire prevention, lone working, trip hazards, hazardous substances, working at height, heavy lifting and the use of equipment.

We require everyone who works with us or for us, including any contractors, to report workplace accidents, incidents, and hazards. We also expect reports of any near misses (when accidents have almost happened) so that we can take the relevant preventative measures.

We expect everyone who works with us or for us to ensure that they are following and working in accordance with all applicable laws and regulations in carrying out their own specific tasks and delivering a high standard of health and safety at all times.

Work safely...

We are committed to providing a safe working environment. This applies when we are working in one of our offices, within properties, on developments, attending viewings and anywhere else.



Section 2.

We compete fairly and honestly

We believe that fair competition is the right way to do business.

Competing fairly and promoting open and honest competition amongst our suppliers is the right way to ensure value for our customers.

We will avoid anything which could give rise to a risk of:

- Agreeing with our competitors what price to charge for products or services – this is known as price fixing.
- Colluding or conspiring with our competitors or others in relation to bids or contracts for goods/services with the result that our customers do not get the most competitive price or value.
- Inappropriate sharing of commercially sensitive information in relation to bids or the supply of goods or services.

The above conduct is unlawful and may give rise to criminal as well as civil liability.

We will be open and fair when one of our Campions group companies is bidding for business from another company within our group, making sure they follow the same procedure as any other third-party bidder.

Conversations or actions do not have to be formally recorded or written down to be inappropriate or illegal.

e.g an informal agreement with a competitor about prices, or passing on commercially sensitive information would be in breach of the law and this Code.

Your checklist for competing fairly & honestly

- You must award business solely on merit and always consider the quality of the services or products
- Seek best value on a competitive basis
- Always run a fair selection process, giving everyone an equal opportunity by treating all submissions in the same way
- If you are ever unsure about whether discussions between you and a competitor or supplier are appropriate, you should ask for advice.



Section 3.

We treat people with respect and uphold our position of trust

We believe that everyone deserves to be treated in a polite and courteous way, and to have their views and issues listened to and taken seriously.

Many of the services we provide affect people and their homes. It is important that everyone who works for us or with us treats our customers, colleagues and suppliers with courtesy, consideration and respect.

We will always be polite and listen. We will never take advantage of those in a vulnerable position.

Whilst good personal relationships are important, we will be conscious of favouritism and always provide consistent levels of service to all we come in contact with.

Non-discrimination and harassment

Discrimination, harassment and abuse are not acceptable, and we are committed to treating employees with respect and dignity and not to discriminate in hiring and employment practices.

We expect our suppliers to treat all employees with respect and dignity and our suppliers shall:

- Neither engage in nor tolerate any discrimination or harassment, including sexual harassment;
- Respect equal opportunities in terms of recruitment, compensation, access to training, promotion, termination or retirement; and
- Not engage in, support or tolerate discrimination on the basis of criteria such as gender, age, religion, marital status, race, caste, social background, diseases, disability, pregnancy, ethnic and national origin, political affiliation or sexual orientation.

Freedom of association and collective bargaining

We respect the freedom of association and the right to collective bargaining. Our suppliers shall grant their employees the right to freedom of association and collective bargaining. Furthermore, we expect our suppliers:

Not to interfere with the employees' rights to form and join unions, or other associations of their own choice;

- Not to discourage membership of unions;
- To ensure that employee representatives are not subject to discrimination and are given access to employees at the workplace; and
- To recognise elected employee representatives.

Section 3. (cont.)

We treat people with respect and uphold our position of trust

Compensation and working hours

We are committed to ensuring that compensation and working hours for work performed by employees of Suppliers is in compliance with applicable labour laws, regulations and practices as well as international labour standards.

Suppliers shall:

- Ensure that work performed is on the basis of a recognised employment relationship established in compliance with applicable laws, regulations and practices as well as international labour standards;
- Compensate employees by providing wages, overtime pay, benefits and paid leave which as a minimum comply with the requirements set out in applicable laws, regulations and collective bargaining agreements;
- Comply with all applicable laws, regulations and mandatory industry standards pertaining to working hours;
- Ensure that overtime is voluntary and infrequent; and
- Ensure that no one is working more than six consecutive days without at least one day off.

Your checklist for treating people with respect

- Always treat people as you would want to be treated yourself
- Remember that actions can be misinterpreted. Always be mindful of how your behaviour might appear to others
- Act in a way that you will always be proud of, one which ensures that your customers and colleagues will want to work with you again
- If you see a colleague or supplier behaving inappropriately, report it immediately.



Section 4.

We adhere to data protection legislation and protect confidential information

We will handle personal data with the utmost care and use it only for legitimate business purposes.

The nature of our business means that we are often entrusted with private or confidential information. We will only keep the information we need to carry out our business obligations or in accordance with the law. We will never disclose data unless we have a lawful basis to do so.

We will be discrete and sensitive in how we handle the information about people and their circumstances.

Commercially sensitive information may be valuable to Campions and we will respect its confidentiality at all times, whether or not it is marked as private or confidential.

Your checklist for protecting privacy and confidential information

- Do not discuss or review confidential information or sensitive situations in public places or leave confidential things where people can see them
- Make sure all sensitive material is locked away, and computers are locked in your absence and turned off at night
- Always be discrete and sensitive about people's personal circumstances
- Email and text communications should be treated with the same level of care as written letters
- If in doubt, always ask for advice before using or disclosing information
- You must only use and disclose data or confidential information to the extent that you are permitted to in order to properly perform your job
- There are specific laws covering data protection and how we handle personal information. So, if your job means that you have access to personal information, you should make sure you know what your obligations and duties are. Ask for advice if you are unsure what you can and cannot do.



Section 5.

We avoid conflicts of interest and follow strict rules for corporate gifts and entertainment

Decisions made at work should not be influenced by personal relationships and should never result in improper personal benefit or gain.

Accepting gifts and entertainment can be a conflict of interest. We do not allow employees or those working on our behalf to accept inappropriate gifts or entertainment.

Every decision made must be made objectively and fairly. A course of action which results or appears to result in personal gain either for an employee, their family or friends or which otherwise compromises impartiality would be a conflict of interest.

If you are not sure if an invitation or gift should be accepted, ask for advice. If you cannot get approval in time, it must be politely declined.

Your checklist for conflicts of interest, and gifts and entertainment

- Do not accept any gift, favour or make any arrangement that has strings attached
- Do not take on other employment that could interfere or conflict with your role at Campions
- Do not try to influence the career prospects of any other Campions employee or a friend or family member who works for Campions
- Avoid any activity or situation that appears to create a conflict of interest, even if customers may think it is a good idea
- All of our employees must follow our Gifts & Hospitality and Conflicts of Interest policies
- An employee/supplier relationship could be seen as a conflict. This will need to be declared to compliancequeries@campionsgroup.co.uk
- Always consider how making or accepting a gift or entertainment might be interpreted by someone outside the business, or an 'impartial observer'
- If you think you might have a conflict of interest, you must report it straight away.



Section 6.

We are committed to the prevention, detection and reporting of money laundering and terrorist financing (Money Laundering Regulations 2017).

We are registered with HM Revenue and Customs (HMRC) under the Money Laundering Regulations 2017.

Money laundering is how criminals change money and other assets they have acquired through crime into clean money or assets that have no obvious link to their criminal origins, so that they appear legitimate.

We along with our representatives will not have any direct or indirect business dealing with:

- Any individual, entity or sector that is the target of sanctions of the United States, the European Union (and its member state), or the United Nations; and/or
- Any person or entity owned or controlled by a person listed on databases of known terrorists, restricted organisations or politically exposed persons in the UK and overseas based upon His Majesty's Treasury (HMT) Sanctions Lists, CIA Political Exposed Persons File and Office of Foreign Assets Control (OFAC) Sanction List.

Your checklist for avoiding Anti Money Laundering

- Be vigilant and observant for the signs of money laundering and terrorist financing – report any suspicion of improper behaviour at the earliest possible opportunity
- Have in place the necessary risk assessments and audit processes throughout the supply chain
- Maintain adequate records of transactions
- If in doubt, ask for advice.



Section 7.

We promote the guidelines to meet requirements of the Companies Act 2006

The Companies Act 2006 is the main piece of legislation which governs company law in the UK. The main aims of the Act are:

- To modernise and simplify company law
- To codify director's duties
- To grant improved rights to shareholders
- To simplify the administrative

Your checklist for adhering to the Companies Act 2006

- Make all the necessary filings at Companies House
- Keep accurate books and records
- Pay all taxes that the company owes and ensure it is completed within the timescales provided by legislation
- If in doubt, ask for advice.



Section 8.

We do business in an open and transparent way, and prevent bribery and corruption

All our relationships are founded on mutual respect and on business practices that are fair, transparent and lawful.

We make business decisions, award contracts and select suppliers on the basis of fair and objective criteria, such as high levels of health and safety/service and good value.

In all our business dealings, we will not give or accept any sort of improper incentive, whether cash or in kind. We will not offer or accept hidden commission payments or any type of bribe and this applies both to our own employees and to anyone who represent us or works on our behalf.

Your checklist for avoiding unacceptable business practices

- Your checklist for avoiding unacceptable business practices
- Make sure everyone is treated fairly and equally when making decisions
- Be vigilant and observant – report any suspicion of improper behaviour at the earliest possible opportunity
- If you are in any doubt whether an improper offer or inducement has been made, politely stop the conversation and report it
- Be aware of how your behaviour might be interpreted or misinterpreted by others
- If you suspect that a Campions employee or someone working on our behalf has behaved in an illegal or unethical way, you must report it at once
- Do not get involved in anything that could potentially be misconstrued, even if your intentions are good.

Section 9.

Our commitment to tackling modern slavery throughout our supply chains (Modern Slavery Act 2015)

We implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are firmly against engaging in or benefiting from the use of child labour. Child labour is defined as work which is harmful to the child's health or physical, mental, spiritual, moral or social development or which interferes with the child's education.

Our Suppliers shall:

- Not recruit or make use of child labour or exploit children in any way; and
- Comply with all applicable minimum age regulations for employment.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the removal of a person's liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships.

We also make sure there is transparency in our own business and in our approach to tackling modern slavery.

Your checklist for avoiding Modern Slavery

- Be vigilant and observant – report any suspicion of improper behaviour at the earliest opportunity (this may be work or services which people are forced to do against their will under the threat of some form of punishment)
- Have in place the necessary risk assessments and audit processes throughout the supply chain
- If in doubt, ask for advice.



Section 10.

We promote the guidelines and responsibilities of the Minimum Wage Act 1998

We believe all workers whether they are directly employed by us or by someone who works for us should receive a fair wage.

A minimum wage is the lowest remuneration that employers can legally pay their workers. Equivalently, it is the price floor below which workers may not sell their labour.

It's a criminal offence for employers to not pay someone the National Minimum Wage or National Living Wage or to fake payment records.

Your checklist for adhering to the Minimum Wage Act

- Maintain adequate records or employment wages
- Keep up to date with changes to the legislation
- If in doubt, ask for advice.



Section 11.

We will act responsibly in the community, and in the interests of a sustainable environment

We want everyone who works for or with Campions to make a positive and constructive impact for the benefit of the communities and the environments which we surround. We want people to be reducing the environmental impact of Campions operations by promoting sustainable processes and products including energy and sustainability awareness. We aim to conserve natural resources by careful management of our operations and reducing greenhouse emissions (GHG).

Our developments are part of a wider community and we will always behave in a considerate and responsible manner towards them, helping to build community spirit, as well as supporting local charitable activities and other good causes.

Our services often involve carrying out work in and around our customers' homes. In this situation, we will consider ways to minimise disruption to their environment, including working quietly, tidily and efficiently.

We also have a responsibility to conform to environmental legislation and minimise impact on the environment by encouraging recycling, reducing energy consumption, and making better use of natural resources.

Your checklist for being a positive member of the community

- Consider new ways you could work for the benefit of your local community
- Ensure all waste electrical and electronic equipment is disposed of appropriately, and encourage your residents to do the same
- Take opportunities to recycle, use resources wisely and conserve energy, and encourage your residents to do the same.



Section 12.

We will make sure you can always raise questions or concerns

We welcome your feedback and we will listen to what you say. This Code is to help you do the right thing.

If you are ever in doubt about something covered by this Code, taking advice or speaking up is always the right thing to do, and you can be sure that we will look into your concerns.

How to raise questions or concerns

Campions Colleagues:

Speak to your line manager or compliancequeries@campionsgroup.co.uk. Alternatively you use our external whistleblowing hotline – contact details can be found in our Whistleblowing Policy. If your concern is about a grievance, you contact a member
of the HR team in accordance with our Grievance Policy.

Suppliers:

Email customer.service@campionsgroup.co.uk
so that your concerns can be registered and acted on.

Summary

1. We will work safely, wherever we are

We require those who work with us and for us to ensure their own safety and the safety of others.

2. We will compete fairly and honestly

We believe that fair competition is the right way to do business.

3. We will treat people with respect, and uphold our position of trust

We believe that everyone deserves to be treated in a polite, courteous way, and to have their views and issues listened to and taken seriously.

4. We will be mindful of people's personal privacy and protect confidential information

We will handle people's information with the utmost care and use it only for legitimate business purposes.

5. We will avoid conflicts of interest, and follow strict rules for corporate gifts and entertainment

We will ensure that decisions made at work are not influenced by personal relationships, and never result in improper personal benefit or gain.

6. We are committed to the prevention, detection and reporting of money laundering and terrorist financing

We are registered with HMRC under the Money Laundering Regulations 2017.

7. We promote the guidelines to meet requirements of the Companies Act 2006

The Companies Act 2006 is the main piece of legislation which governs company law in the UK.

8. We will prevent, detect, and report money laundering and terrorist financing activity

We take a zero-tolerance approach to the facilitation of money laundering and the financing of illegal activity.

9. We will do business in an open and transparent way, and prevent bribery and corruption

We will not tolerate any underhand business practice in our own company, or from anyone who works with us or for us.

10. Our commitment to tackling modern slavery throughout our supply chains

We implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

11. We promote the guidelines and responsibilities of the Minimum Wage Act 1998

We believe all workers should receive a fair wage.

12. We will act responsibly in the community, and in the interests of a sustainable environment

We want everyone who works for or with Campions to make a positive and constructive impact for the benefit of the communities and the environments in which we operate.

We reserve the right to verify compliance with this Code of Conduct through supplier audits at any time and the supplier shall provide reasonable assistance to support such an audit.

We reserve the right to terminate its relations with any supplier that does not, or whose sub-contractors do not comply with the material obligations of this Code.

The way we work.

Our Code of Conduct principles

campionsgroup.co.uk

CAMPIONS