

Insuletics Ltd.

Code of Conduct

Revision A – 4/10/2012

Revision B 3/11/2014

Approved by: Ian Coates
Managing Director

A handwritten signature in black ink, appearing to read "Ian Coates".

3rd November 2014

Contents

- 1 Introduction
2. Conflicts of interest
- 3 Compliance
- 4 Corruption/Bribery Laws (Bribery Act 2010)
5. Competition law / Anti-trust .
6. Gift & Benefits Policy
7. Whistleblowing Policy & procedures
- 8 Declaration

1.0 Introduction

The public image of Insuletics Ltd is determined by the conduct of each of its employees.

It is therefore important that the Insuletics employees conduct themselves appropriately at all times as the image of the company can be seriously affected by any inappropriate behaviour

This Code of Business Conduct is designed to set certain standards of conduct for all employees and provides a set of guiding principles that all employees should adopt when carrying out their business duties.

All employees are individually responsible to know and understand the Code of Conduct and the laws pertaining to them. Managers will be held accountable to ensure that the policies are properly communicated and oversee the compliance.

These rules are not intended to cover all eventualities and as such it may be necessary to use judgment and common sense as situations arise. If in doubt advice should be sought from the line manager

This code of conduct applies to all employees regardless of their position.

Insuletics Ltd has a zero tolerance on Bribery, corruption and anti-competitiveness. Any breaches of the policies contained on within this Code of Conduct will result in disciplinary procedures in accordance with the contract of employment and may result in dismissal of the employee.

2. Conflicts of interest

Conflicts of Interest must be avoided by all employees.

A conflict of interest is where an employee's private interest is in conflict with the interest of Insuletics Ltd.

Where such a potential Conflict of Interest cannot be avoided it must be declared and the employee must undertake to discharge their responsibilities in the best interest of Insuletics Ltd over and above any personal interest.

No interest must be held in any customers, competitors or suppliers. If any employee or member of their family obtains any interest in a customer's, competitors or supplier's business this must be declared.

3. Compliance

Insuletics Ltd is committed to conducting its business in accordance with applicable law and regulations.

When dealing with customers, suppliers, competitors or other third parties all employees are expected to respect and comply with laws and regulations and they must not enter into any agreements that could in any way be construed as being anti-competitive, discriminating or illegal.

All employees are also expected to undertake their duties with integrity and professionally.

4. Corruption/Bribery Laws (Bribery Act 2010)

- Bribery must not be used under any circumstances.
- Corporate funds must not be used for any unlawful or improper purpose.
- Employees must not attempt to secure an unfair business advantage by offering, providing or accepting, either directly or indirectly, any undue pecuniary or other advantage.

5. Competition law / Anti-trust .

Insuletics Ltd supports fair competition and will not tolerate any violation of the anti-trust & competition laws. Employees must therefore comply with all of these regulations

6. Gift & Benefits Policy

The purpose of the Gifts & Benefits Policy is to provide clear guidance on the acceptance or non-acceptance of gifts by personnel at Insuletics. The receipt of gifts, cash or other benefits by Insuletics employees, is generally inappropriate.

Objectives:

- Reflect the professional behaviour expected of Insuletics employees
- Provide a working environment that is safe and reduce the perceived or actual risk that the receipt or expectation of any gift, cash or benefit might influence or appear to influence an individual's official work capacity.

Responsibility:

It is the responsibility of all Insuletics employees to adhere to the *Gifts and Benefits* Policy and Procedure.

Gifts and Benefits Procedure:

Insuletics employees agree to:-

- Neither seeks nor accepts gifts, cash or benefits intended to or likely to influence the way they carry out their work duties.

- Neither seek nor accept gifts, cash or benefits from any current or past client or supplier, their next of kin or guardian nor from their deceased estate.
- Always inform a supervisor if they have been offered or given a gift, cash or benefit.
- Report immediately to the managing director any offer from any person, their next of kin or guardian that may constitute corrupt conduct.
- Avoid all situations in which it could be seen that a person, or company through the provision of hospitality, gift, cash or benefit of any kind is securing or attempting to secure influence or favour from Insuletics or a person representing Insuletics.

Gifts & Benefits Registry Procedure:

It is recognized that occasionally Insuletics employees will offer or receive gifts, Hospitality or entertainment that is of insignificant monetary value. For example, at Christmas, and to refuse such an offering from a service user may upset them or cause offence.

On such occasions it is at the discretion of the direct line manager to approve the acceptance of token gifts or benefits only if it cannot be seen as compromising Insuletics or employee personally. All donations must be authorised by two individuals the line manager and the managing director.

7. Whistleblowing Policy & Procedures

Whistleblowing encourages and enables employees to raise serious concerns **within** the Insuletics rather than overlooking a problem or 'blowing the whistle' outside.

Employees are often the first to realise that there is something seriously wrong with an organisation. However, they may not express their concerns as they feel that speaking up would be disloyal to their colleagues or to the Organisation.

Our Commitment:

Insuletics is committed to the highest possible standards of openness, probity and accountability. In line with that commitment we expect employees, and others that we deal with, who have serious concerns about any aspect of Insuletics's work to come forward and voice those concerns.

The policy applies to all employees, (including those designated as casual hours, temporary, agency, authorised volunteers or work experience), and those contractors working for Insuletics. It also covers suppliers and those providing services under a contract with Insuletics in their own premises.

The Aims of the Policy:

- To encourage you to feel confident in raising concerns and to question and act upon concerns about practice.
- To provide avenues for you to raise concerns in confidence and receive feedback on any action taken.
- To ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied.

- To reassure you that you will be protected from possible reprisals or victimisation if you have a reasonable belief that you have made a disclosure in good faith.

What Types of Concern are covered?

- Conduct which is an offence or a breach of law.
- Failure to comply with a legal obligation.
- Disclosures related to miscarriages of justice.
- Health and safety risks, including risks to the public as well as other employees.
- Damage to the environment.
- The unauthorised use of public funds.
- Possible fraud and corruption.
- Sexual, physical or other abuse of clients.
- Other unethical conduct.
- Actions which are unprofessional, inappropriate or conflict with a general understanding of what is right and wrong.

NB. Other procedures are available to employees e.g. the Grievance procedure which relates to complaints about your own employment.

Safeguards and Victimisation

Insuletics recognises that the decision to report a concern can be a difficult one to make. If what you are saying is true, you should have nothing to fear because you will be doing your duty to your employer and those for whom you provide a service.

Insuletics will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith.

Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal your identity if you so wish. At the appropriate time, however, you may need to come forward as a witness.

This policy encourages you however to put your name to your concern whenever possible. Please note that:

- Staff must disclose the information in good faith.
- Staff must believe it to be substantially true.
- Staff must not act maliciously or make false allegations.
- Staff must not seek any personal gain.

How to Raise a Concern:

As a first step, you should normally raise concerns with your immediate supervisor/manager or their superior. This may depend, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if you believe that management is involved you should approach a more senior level of management within your Directorate.

8 Declaration

I have read and understood the Insuletics Code of Conduct. I agree to abide by its contents and I understand that there are consequences for any breaches of the Procedures and Policies contained.

Name: _____ Signature: _____

Date: _____