Business Ethics Policy

Introduction

Ethical business practice is one of the guiding principles of Stepping Stones Care's Children's Homes (SSC). The SSC Board is committed to ethical business conduct and expects the highest standards of integrity to be followed by all employees in each of its businesses wherever services are delivered.

This Business Ethics Policy ("this Policy") specifies the standard of behaviour SSC expects from its employees, and others acting on its behalf, when conducting business on behalf of SSC. It applies in addition to the other policies, procedures, codes and statements that have been issued by SSC and/or its operating companies.

Business Ethics and Legal Compliance

SSC requires all employees to conduct business with honesty and integrity. It is SSC policy to comply with this requirement in all aspects of its business, and to ensure compliance by its employees and agents with all applicable legal and ethical standards of each country, state, province or local jurisdiction in which SSC business is conducted.

Duty to Report Non-Compliance

If employees have knowledge of any activities which they have reason to believe may violate this Policy, they must report such activities immediately. SSC relies on its employees' vigilance to notify it when something isn't quite right.
Employees are able to raise their concerns with their Line Managers or business Director. In addition, SSC has a whistleblowing policy that provides details of external independent "hotlines" that can be called to report concerns anonymously.

Conflicts of Interest

See Conflict of Interest Policy

Gifts and Hospitality

All gifts and hospitality given or received by an employee must comply with the SSC Gifts policy.

Improper Payments

No employee may offer, pay, promise or authorise the payment of money or anything of value to any other person where they knows or believe that the money or thing of value will be improperly given or promised in order to obtain, retain, facilitate or expedite business for SSC. No payments may be made for the purpose of improperly influencing the action or decision of the recipient, inducing the recipient to do or refrain from doing any act in breach of their lawful duty, or inducing the recipient to exert influence on any foreign government or its department or agency. SSC has a zero-tolerance policy to bribery and corruption.

Compliance with Laws Prohibiting Anti-Competitive Activity

SSC complies with all aspects of competition law. SSC policy and procedure to ensure no anti-competitive contact takes place is available to all employees, and rigorous training is undertaken throughout the business. Potentially anti-competitive contact is reported.

Political Contributions and Activities

SSC makes no political contributions and is not affiliated to any political party.

Supplier Relations

Our relationships with the people and organisations that supply goods or services to SSC are of paramount importance. Suppliers are selected impartially, on the basis of price, quality, performance and suitability of product or services.

Health, Safety and Environmental Protection

Employees are responsible for conducting SSC business in a manner that protects the health and safety of SSC employees and the public, as well as the environment. They should act at all times in a manner that ensures SSC complies with all applicable health, safety and environmental requirements. Please refer to SSC Health and Safety Policies.

Equality, Diversity and Inclusion

SSC values the diversity provided by gender, race, colour, ethnic or national origin, sexual orientation, religion, or marital status. The principles and practices of equal employment opportunity and workforce diversity contribute to the achievement of SSC business objectives. Please refer to SSC Equality and Diversity Policy.

SSC expects its employees to maintain a workplace that is free from any form of discrimination, harassment or bullying.

Human Rights

SSC business activities are pursued with respect for human rights. As such, it needs to ensure and demonstrate that it treats all employees and contractors fairly, legally, with respect, and with dignity. SSC endeavours to operate in a manner consistent with the principles of the United Nations Universal Declaration of Human Rights and the core International Labour Organisation Convention areas (freedom of association, collective bargaining, non-discrimination, prohibition of child labour and of forced labour).

We will not participate in, contribute to, or obtain information from any blacklist or other similar service which undermines these principles and, as part of this obligation, we will ensure that compliance with our Equality and Diversity Policy, as well as this Business Ethics Policy, will form part of the selection process for appointing subcontractors and other members of our supply chain.

Confidentiality

During the course of employment, employees may acquire information not generally known to the public, including knowledge of a commercially sensitive nature, business plans or outlook, marketing or sales programmes, customer lists, significant new services or price changes, mergers and acquisitions, changes in management, and other proprietary and confidential information. Employees must not disclose, during or after their employment by SSC, any non-public information regarding SSC business or operations to any outsider unless disclosure is authorised in writing by Senior Management.

Whenever possible, authorised third party recipients of SSC confidential information should be required in advance to execute agreements acknowledging their confidentiality obligations to SSC.
The terms and conditions of employment for all employees make it clear that all information which becomes available as a direct result of their employment is confidential to SSC and should not be disclosed, except as required in order to achieve SSC business objectives.

SSC undertakes to protect the personal data of all persons with whom it holds a record in accordance with the Data Protection Act 1998.

Corporate Governance

The SSC Board recognises the importance of high standards of corporate conduct and is committed to managing SSC operations in accordance with the best principles of corporate governance as contained within The UK Corporate Governance Code. The SSC corporate governance statement is available on the SSC website.

Personal Conduct Outside the Work Place

SSC's reputation depends largely upon its people and how they interact with stakeholders within and outside the organisation as well as how they behave in the public domain outside their place of work.

Communications – Government Inquiries, Investigations, Consultations and Lobbying

From time to time, SSC may be obliged to permit various government agencies to review certain policies and practices. It is SSC policy to ensure that inquiries from government agencies are properly handled to minimise SSC exposure and liability. In the event that copies of specific Group procedures, practices, or interviews with SSC Employees are requested by representatives of government agencies, such requests should be handled in a manner consistent with such procedures or practices. Non-routine requests by government representatives should be referred immediately to the SSC Managing Director, Company Secretary and Compliance Director without any further discussions with such contact.

From time-to-time, SSC may present its position on a particular topic to government, or other official bodies, whether during a review of policies/legislation, part of a consultation process or because of its expertise in a particular area. Consultation of this type may also occur through any of the trade organisations to which it is a party. On other occasions, SSC may lobby on a particular issue to ensure that the policy makers understand the issues fully and are therefore able to develop appropriate policies.

In any of these circumstances, SSC and its employees will:

- → Ensure that views put forward are fair, true, accurate and free from any personal bias and that they represent the Company's views;
- → Not bring the Company into disrepute;
- → Comply with the wider requirements of this Business Ethics Policy to report any conflicts of interest and to act with honesty and integrity.
- → Properly handle communications and news media relations

It is important that inquiries from the news media are properly handled in order to maintain effective public relations and to protect SSC's competitive position and propriety information. Employees must not discuss SSC business with any member of the news media, even on an informal basis. This will minimise news stories based on rumour or unofficial "tips" which can be damaging to SSC's best interests. All requests for information from the news media (including, in particular, those relating to financial or commercial matters) must be referred to SSC Company Secretary.

Communications – Email, Internet and Social Media

Employees are required to follow the provisions detailed in SSC Use of Business Systems Policy (and related guidelines), as well as SSC Social Media Usage Policy (and related guidelines), when using email and the internet.

Management has responsibility on a day-to-day basis for ensuring that access to the business systems is used prudently. Managers must ensure that contract or temporary employees are informed and familiar with these policies and that they agree to be bound by the terms listed.

Key issues with regard to the use of these IT facilities are:

- → Misuse of email, internet or social media for personal communications;
- → Risk of defamation by an individual or organisation;
- → Bringing into the workplace via email, the internet or social media material of a racist, pornographic, sexist, obscene, abusive, defamatory or other inappropriate nature or material that may be in breach of copyright;
- → Unwittingly creating a binding contract with a supplier, client, etc.;
- → Knowingly introducing a virus to company equipment or forwarding a virus.

Other Policies etc.

Elements of ethical business practices are referred to in many other SSC publications, and several of the topics raised in this Policy also appear in more detailed and defined policies, procedures, codes and/or statements already in place within SSC. In this context, where any questions or doubts arise over the interpretation of this Policy, please refer in the first instance to the appropriate subject-specific policy (or procedure guidance, if applicable). Employees should also contact the SSC Legal Department.

Other affiliated SSC policies and statements, all of which are available through the appropriate Departments, include the following:

- → Whistleblowing Policy
- → Conflict of Interest Policy
- → Gifts Policy
- → Competition Law Policy and Procedures
- → Anti-Bribery and Corruption Policy
- → Health and Safety Policy
- → Equality and Diversity Policy
- → Data Protection Policy
- → Information Communication Technology (ICT) Acceptable Usage Policy
- → Modern Slavery Act (2015) Statement

Further Information

If you have any questions concerning this policy or would like further guidance, please refer to SSC's Code of Conduct.

Signposting

Bribery Act 2010
https://www.legislation.gov.uk/ukpga/2010/23/contents

The Competition Act 1998
https://www.legislation.gov.uk/ukpga/1998/41/contents

The Health and Safety at Work Act 1974
https://www.legislation.gov.uk/ukpga/1974/37/contents

The United Nations Universal Declaration of Human Rights
https://www.un.org/sites/un2.un.org/files/2021/03/udhr.pdf

The International Labour Organisation Convention
https://www.ilo.org/international-labour-standards/conventions-protocols-and-recommendations

The UK Corporate Governance Code
https://www.frc.org.uk/library/standards-codes-policy/corporate-governance/uk-corporate-governance-code/