

SUPPLIER CODE OF CONDUCT

Real People. Real Feelings. Real Innovation.

The Company endeavours to be responsible and honest, and to apply high ethical standards to delivering our consulting services, by always asking – what’s the right thing to do? We expect our employees and all supplier partners to comply with this Code of Conduct, and those of the Company clients they support.

FAIR EMPLOYMENT

All employees, clients, and supplier partners have the right to fair treatment. This means we celebrate diversity with a zero-tolerance policy for unfair treatment, including harassment, discrimination, and victimisation, on the grounds of gender; race; national or ethnic origin; sexual orientation; gender identity or expression; religion; political belief; trade union activity; marital status; disability; age; or citizenship.

All employees are entitled to be treated with respect and dignity. This includes ensuring that personal information is managed sensitively and confidentially in accordance with the appropriate legislation in place at the time. All employees:

- Receive written details of their terms of employment,
- Are free to leave their employment with reasonable notice.

All parties must remain compliant with applicable employment legislation.

MODERN SLAVERY

The Company takes steps to ensure measures are in place to protect itself, its’ clients and supply chain from the threat of human trafficking, slavery and forced labour.

We require all supplier partners to comply with moral and legal obligations in place and to take all appropriate steps to ensure their business operations are free from slavery and human trafficking, whether in the UK or elsewhere in their business or ongoing supply chain.

Supplier partners supplying our clients are required to be familiar with and comply with the procedures for reporting concerns regarding modern slavery to both the Company and the client.

HEALTH & SAFETY

All employees, contractors, visitors and other associates of our suppliers are entitled to be provided with a healthy, safe working environment, complying with appropriate legislation and recognised standards. All necessary precautions should be taken, which apply to the work undertaken by the supplier, to prevent accidents or injury occurring in the course of the business undertaking.

Policies and procedures are accessible to employees, contractors and visitors and appropriate training should be provided in relation to all relevant aspects of workplace safety. A process for reporting breaches or concerns in relation to health & safety legislation must be in place.

All parties will comply with appropriate standards such as the United Nations agency - International Labour Organisation (ILO) in relation to the prohibition of child labour and age-related limitations relating to night and lone working.

<https://www.ilo.org/declaration/lang--en/index.htm>

WHISTLEBLOWING

Company employees and all supplier partners must have a process in place to encourage whistleblowing and protect those making disclosures in accordance with the Public Interest Disclosure Act 1998 or other legislation of the operating jurisdiction.

Protect is a charity concerned with whistleblowing issues. Their helpline +44 (0)20 3117 2520 and [the Protect Advice Line](#) offers free and confidential advice to anyone about misconduct at work who is not sure whether or how to raise their concerns. Protect aims to help enquirers to identify how to best raise the concern while minimising any risk to the whistleblower and maximising the chances for the misconduct to be addressed appropriately.

DATA SECURITY & CONFIDENTIALITY

The Company has a designated Data Protection Officer.

We expect all parties to acknowledge and follow GDPR legislation. We train our staff on their responsibilities - including data collection, storage, transmission, and security. We expect our suppliers to adopt an equally high standard.

Data breaches of MSP GURU LTD, data or that of our clients, must be reported to the MSP GURU Data Protection Officer – GDPR@msp-guru.com.

ENVIRONMENT

The appropriate regulations and legislation in relation to the protection of the environment must be followed.

Supplier business operations must be conducted in accordance with industry best practice and sustainably and responsibly.

Suppliers should be able to demonstrate ongoing initiatives to minimise environmental impact from their business operation. Employees should be educated and encouraged to recycle and support other community sustainability initiatives.

ANTI-BRIBERY & CORRUPTION

All anti-bribery and anti-corruption laws applicable to your business must be complied with including, where applicable, the UK Bribery Act 2010.

Suppliers must maintain a policy that prohibits and procedures that prevent:

- any offer, promise, gift or solicitation of an advantage as an inducement or reward to a person for the improper performance of that person's position or as an attempt to influence a person in that person's capacity as a public official; and
- participation in any other form of corrupt practice (such as theft, fraud, conspiracy to defraud, blackmail, participation in a criminal organisation and money laundering) under any circumstances.

DAVID D BALLEW

David Ballew
Chief Executive Officer