

	GX Group Ethics Policy			Rev 1	Pg 1 of 2
Issued by	NB	Date	8/1/2024	Approved	NB

## Policy statement

GX Group is committed to the practice of responsible corporate behaviour. Through our business practices we seek to protect and promote the human rights and basic freedoms of all employees and agents. Further we are committed to protecting the rights of all of those whose work contributes to the success of the Company, including those employees and agents of suppliers to the Company. This policy is non-exhaustive, and all aspects of the Company's business should be considered in the spirit of this policy.

## Conflicts of Interest & Anti-Corruption

- GX Group Ltd holds the trust and confidence of those with whom it deals, including clients, suppliers and employees as fundamental to its success. Conflicts of interest potentially undermine the relationship of the Company with its partners. In order to help preserve and strengthen these relationships, the Company has developed rules and guidelines concerning the conduct of its officers and employees aimed at minimising the possibility of conflicts of interest. Employees may not accept corporate hospitality or gifts which could be considered an incentive, enticement or conflict of interest in any way, shape or form. In the instance of any uncertainty, receipt of such gifts or hospitality must be approved by The Managing Director prior to being accepted.
- The company will operate in accordance with the policies, procedures and restrictions of its clients in relation to corporate hospitality, gifts and incentives at all times.
- The company will not offer inducements, commissions or rewards of any kind to clients or individuals acting on behalf of clients; nor will it show particular favour or disfavour to any person in relation to the contract or delivery of the services.
- Employees and anyone working on behalf of the company must disclose any anticipated conflict of interest which may have the potential to interfere with the person's loyalty and objectivity while carrying out their job.
- Employees are expected to adhere to the rules and procedures set out in the Anti-Criminal Finance Policy.
- All officers, employees and representatives of the Company are expected to act honestly and within the law (including the Prevention of Corruption Acts 1889-1916 and the Bribery Act 2010. Information and Confidentiality Information received by employees, contractors or agents of GX Group Ltd will not be used for any personal gain, nor will it be used for any purpose beyond that for which it was given. The Company will at all times ensure that it complies with all applicable requirements of data protection legislation in force from time to time.

## Suppliers and Partners

- GX Group Ltd expects all suppliers and partners to work towards and uphold similar ethical and moral standards.
- We will investigate the ethical record of potential new suppliers before entering into any agreement. Further, the Company reserve the right to request information from suppliers regarding the production and sources of goods / services supplied.
- The Company reserve the right to withdraw from any agreement or other arrangement with any supplier or partner who is found to have acted in contravention of the spirit or principles of this Policy.

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### Ethical Purchasing & Procurement

GX Group Ltd is committed to procuring its works, goods and services in an ethically and environmentally sensitive way, yet with proper regard to its commercial obligations, ensuring that suppliers deliver to agreed timescales, quality and cost. Purchasing is undertaken in a manner that encourages competition and offers fair and objective evaluation of offers from all potential suppliers. Purchase of goods and services with an annual value in excess of £10,000 excluding VAT will be conducted according to the following principles:

- Completion of a business case to evidence the need to purchase.
- Procurement practices will be transparent, auditable and fair.
- Research will be conducted to ensure a clear understanding of the risks associated with the purchase of goods and services, and purchasing decisions will include contingency and risk mitigation strategies.
- Tendering is based on both quality and cost, is evaluated in a fair, objective, and structured manner that actively encourages competition.
- Small, local and BAME (Black, Asian & Ethnic Minority) organisations will be encouraged to participate in the procurement process.
- Company employees responsible for purchasing will not accept corporate gifts, or any type of solicitation that could be construed as enticement.
- The procurement process demonstrates that the approach taken to competition is rigorous, balanced and driven by service needs and market intelligence.
- Potential suppliers are ethical, sensitive to the environment and operate within EU and UK legislation.
- Suppliers are able to demonstrate their ability to deliver continuous improvement and cost savings throughout the life of the contract.
- Business transactions will, where possible be conducted electronically.

### Review

This policy will be reviewed regularly and may be altered from time to time in light of legislative changes or other prevailing circumstances.

The policy review date is 7/1/2025

**Nick Broad**

**Operations Director**

**Signed:**



**Date: 8/1/2024**