

Business Ethics Policy

Objective

Connect Plus is the steward of the M25 Network and as such has a duty to both embody strong integrity and business ethics and to positively influence the M25 community to do the same so that everyone has a clear understanding of what behaviours are expected of them. Connect Plus Chief Executive Officer leads the implementation of this policy but we all contribute to its success.

What this policy demands of us

We comply with all relevant laws, including the Bribery Act 2010, anti-corruption legislation, the Modern Slavery Act 2015, and other regulations including the Generally Accepted Accounting Principles, and the M25 DBFO Contract.

We do not tolerate any form of corruption, bribery, gifts or undue payment, received or offered. We don't offer or solicit anything that will induce people or companies to act contrary to their duties, as such token gifts such as low-value corporate merchandise are not considered bribery.

We do not tolerate any unfair anti-competitive activities where an employee uses their position, contacts or knowledge gained through work for personal gain or to benefit family or friends.

We do not tolerate any discrimination or harassment. We encourage everybody within the M25 community to report legitimate concerns and grievances so that they can be reviewed and actioned, without retaliation.

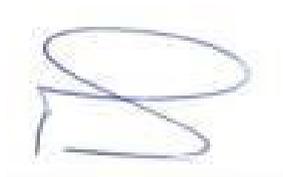
We promote fair treatment of all, providing equal opportunities to people regardless of race, colour, gender, nationality, religion, ethnic affiliation or other distinguishing characteristics. We don't use forced or slave labour and don't restrict the free movement of employees.

We avoid all conflicts of interest, however where such conflicts do arise, we manage them through disclosure to the Board. All conflicts of interest are recorded in the Register of Gifts and Hospitality.

We strengthen relationships within our community through workshops, learning, attendance to award ceremonies, charity events and other initiatives.

We restrict hospitality or entertainment to breakfast/lunch/dinner meetings and industry lunches or dinners. Hospitality received must be of a nature and scale that is no greater than Connect Plus is likely to offer in return. Connect Plus always pays for travelling and accommodation when we are invited to an event. When we arrange events, the invitee's employer pays for travelling and accommodation. We maintain a Register of Gifts and Hospitality to provide a transparent and auditable record for hospitality and gifts, as per the thresholds below (the amounts don't include costs for travel to and from place of hospitality):

Gift / Hospitality	Action
Gift received or offered below £20	Not required to enter on the Register
Gift received above £20	Politely declined, or prior line management approval to give it to charity or share it with the team and always recorded on the Register.
Hospitality received or offered below £60	Not required to enter on the Register
Hospitality received or offered above £60	Required to enter it on the Register
Hospitality received or offered above £100	Prior line management approval required, and information must be entered on the Register



Andy Dean
Chief Executive
January 2020

