

OUR POLICY

OBJECTIVE

The purpose of this policy is to uphold the highest standards of integrity and business ethics within Connect Plus. It aims to positively influence the M25 community, ensuring a shared understanding of the behaviours expected of all parties. The Chief Executive Officer leads the implementation of this policy, with contributions from all team members.

Definition

Gift	A gift is something given as a present to another person, this includes gift vouchers, cash rewards, hampers, gifted alcohol, event tickets, etc. Trivial gifts such as unsolicited promotional items (i.e. stationary, pens) or other low value items that have no commercial value are not covered by this policy.
Hospitality	Hospitality refers to meals and functions outside of the DBFO Co and parent Companies and includes receptions, presentations, conferences, invitations to events such as social, cultural, education or sporting events, Christmas/Summer parties, awards dinners solely sponsored by external organisations, trade association events, transport and/or accommodation provided by the hosts to/from an event etc. It would not usually include a training event or a working lunch at CP's or a third party's premises.

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. Token gifts such as low-value corporate merchandise are not considered bribery.

We do not tolerate any unfair anti-competitive activities where a member of Connect Plus staff 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.

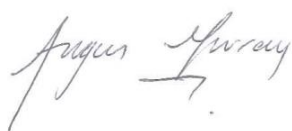
We promote fair treatment of all, providing equal opportunities to people regardless of race, colour, gender, nationality, religion, ethnic affiliation or other distinguishing characteristics. We don't use forced or slave labour and don't restrict the free movement of Connect Plus staff.

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 do not 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 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 £120	Prior line management approval required, and information must be entered on the Register



Angus Murray

Chief Executive

January 2025