

ETHICS, ETHOS & BUSINESS PERFORMANCE

12. Business Ethics

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The purpose of this policy is to provide guidance to employees on the ethical standards expected when dealing with McFT's stakeholders; including other employees, customers, shareholders, suppliers, and society in general.

All employees of McFT are expected to carry out their work in accordance with its business standards of conduct and are expected to report any violations of the Business Ethics Policy or the Bribery Act 2010 to a manager.

Conflicts of Interest

All employees are expected to carry out business activities and make decisions that are in the best interest of McFT. Employees must not give favourable prices for goods or services for personal favour or gain. Likewise, they are not expected to use personal relationships, use bribes, gifts or other means to gain favourable prices from suppliers.

If an employee has business dealings with a close friend or relative during the course of their work with McFT, they should inform their line manager. Should the employee believe that there may be a conflict of interest in their business dealings, or expect that a conflict of interest may occur, they should discuss their concerns immediately with their line manager.

Bribery and the Bribery Act 2010

Employees should not, on behalf of McFT, offer, promise, give, solicit or accept any bribe. The bribe might be cash, a gift or other inducement to, or from, any person or company. In this context a bribe is considered to be a financial or other advantage that is offered or requested with the intention of inducing or rewarding improper performance of a function or activity. Please refer to the Anti-Bribery policy for further details.

Giving and Receiving Gifts

From time to time employees may be given gifts from suppliers or customers. Employees may accept gifts, provided that they are not intended as a bribe and/or construed as part or full payment for McFT goods or services.

The employee must bring to the immediate attention of their line manager, any gift(s) that exceed £20 in value or appear to be unreasonably expensive / generous. For the purpose of this document, gifts include lunches, trips, events, goods and services.

If you are giving gifts or hospitality, McFT permits entertainment, gifts, hospitality and promotional expenditure specifically for establishing or maintaining good business relationships; to improve the image and reputation of the Company; or to present the Company's services effectively. It must be arranged in good faith, and not offered, promised or accepted to secure an advantage for McFT or any of its employees or to influence the recipient.

The Company will authorise only reasonable, appropriate and proportionate entertainment and promotional expenditure.

McFT Staff Handbook – individual policy

Charitable and political donations

McFT considers that charitable giving can form part of its wider commitment and responsibility to the community. The Company may also support fundraising events involving employees. Any such practices will be proportionate, reasonable and made in good faith.

Confidentiality

Employees must treat all information that they deal with during their time at McFT as confidential, especially when dealing with competitors. This should remain true even after the employee has left the employment of McFT.

Employees will not be asked to obtain information about competitors that is not in the public domain. In the interest of fair trade, employees joining McFT from competitor organisations will not be pressurised to provide information regarding their former employer(s).

Social and Environmental Responsibility

McFT takes seriously its social and environmental responsibilities. For more information, please refer to the Social and Environmental Responsibility Policy.

Health, Safety and Welfare

It is the policy of McFT on company premises, site work and during travel to regard health, safety and welfare of employees, subcontractors and customers as of the highest priority. Please refer to the Health & Safety Section for further information.

Equal Opportunities

McFT is an equal opportunities employer. Please refer to the Equality & Diversity Policy for further information.

Child, Forced and Gang Labour

McFT operates its employment policies strictly in accordance with UK Law and within the principles of SRM8000 and the Modern Slavery Act 2015. The company will not employ child, forced or un-registered gang labour – and will not deal with sub-contractors and suppliers who do.

Mental or Physical Coercion

McFT does not engage in or support the use of corporal punishment, mental or physical coercion or verbal abuse to any employee

Collective Bargaining

McFT recognises the right of each employee to join a Trade Union – as they have a right not to join a Trade Union. Where a significant number of employees belong to such an organisation and a duly appointed representative can fairly negotiate on their behalf, the company will be pleased to enter into such negotiations. Such duly representatives will not be subject to discrimination and will be afforded access to members in the workplace.

Harassment and Anti-Bullying

Harassment and/or bullying in any form, will not be tolerated. Please refer to the Inappropriate Behaviour Policy for further information.

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Moonlighting

Employees must not, at any time during their employment with McFT, work for a competitor or use company property for personal gain.