

# Policy 012 -Ethical Practices

## Revised January 2025



### 1 Policy Statement

1.1 Vinovius Ltd (“the Company”) is committed to conducting its business with the highest standards of ethics, integrity, and professionalism. This Policy establishes the Company’s expectations for ethical conduct and outlines responsibilities to ensure compliance with applicable laws, regulations, and best practices.

1.2 The Company values its reputation and relies on its employees, subcontractors, and agents to act ethically, transparently, and in alignment with its core principles.

### 2 Objectives of the Policy

2.1 To ensure that all Company activities are conducted ethically and responsibly.

2.2 To provide clear guidance to employees, subcontractors, and agents on ethical decision-making.

2.3 To promote a culture of integrity and transparency within the Company.

### 3 Designated Officer

Name: Ben O’Connell

Position: Commercial Director

Email: [ben.oconnell@vinovius.com](mailto:ben.oconnell@vinovius.com)

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## 4 Principles of Ethical Conduct

**4.1 Honesty and Integrity:** Conduct business honestly and transparently, avoiding misrepresentation or deceit.

**4.2 Respect:** Treat colleagues, clients, and stakeholders with dignity and fairness.

**4.3 Accountability:** Take responsibility for personal and professional actions.

**4.4 Compliance:** Follow all applicable laws, regulations, and Company policies.

**4.5 Confidentiality:** Safeguard sensitive information and respect the privacy of individuals and organisations.

## 5 Prohibited Conduct

Employees, subcontractors, and agents are strictly prohibited from:

5.1 Engaging in bribery, corruption, or fraudulent activity.

5.2 Misusing Company resources or information for personal gain.

5.3 Discriminating against or harassing others.

5.4 Participating in conflicts of interest without full disclosure.

## 6 Reporting Unethical Practices

The Company encourages employees to report any suspected unethical practices or breaches of this Policy. Reports can be made to the Designated Officer or through the Company's whistleblowing mechanism. All reports will be treated confidentially and investigated appropriately.

## 7 Consequences of Breach

Breaches of this Policy may result in disciplinary action, up to and including dismissal. Subcontractors or agents found in breach may have their contracts terminated. Additionally, individuals may face legal consequences for unethical actions.

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## 9 Advice and Support

For further guidance or support, employees may contact the following organisations:

Institute of Business Ethics (IBE)

Helpline: 020 7798 6040

Website: [www.ibe.org.uk](http://www.ibe.org.uk)

Citizens Advice Bureau

Helpline: 0800 144 8848

Website: [www.citizensadvice.org.uk](http://www.citizensadvice.org.uk)

## 10 Review and Monitoring

This Policy will be regularly reviewed to ensure its effectiveness and relevance to the Company's operations. Employees are encouraged to provide feedback to enhance its implementation.

This policy has been approved & authorised by:

Name: Gregory O'Connell

Position: Managing Director

Date: 07.01.2025

Signature:

A handwritten signature in black ink, appearing to be 'Gregory O'Connell', written over a horizontal line.