

Ethical Business Policy

At ODGroup (incorporating ODProjects (Holdings), ODCreate & ODInteriors), we are committed to running and developing our business in an ethical, responsible manner for the benefit of our employees, clients, suppliers, and the communities in which we operate. Embedded in our company values, we refuse to compromise our integrity and adhere to the highest standards of quality, behaviour and care at all times.

As we can not anticipate every situation OD or it's employees may encounter, the following guidelines which underpin this policy, set the standards we aim to apply to all of our business activities:

- We require all employees to treat anyone within the working environment with dignity and respect and make ethical, sensible judgements in their daily practice
- Promote a culture where we live by our values, Quality, Integrity and Communication
- Avoid conflicts of interest between our work and personal life
- Create and maintain a safe working environment
- Protect the environment we live and work in
- Comply fully with our legal obligations

Bribery and Corruption

Definitions:

Bribery - Giving or receiving a financial or other advantage in connection with the "improper performance" of a position of trust, or a function that is expected to be performed impartially or in good faith.

Corruption - Dishonest or fraudulent conduct by those in power, typically involving bribery

We will not:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given
- give or accept a gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome
- accept a payment, gift or hospitality from a third party that you know or suspect is offered with the expectation that it will provide a business advantage for them or anyone else in return
- accept hospitality from a third party that is unduly lavish or extravagant under the circumstances
- offer or accept a gift to or from government officials or representatives, or politicians or political parties, without the prior approval of your line manager
- threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any other activity that might lead to a breach of this policy

Gifts, Hospitality and Expenses

The exchange of gifts and hospitality can build goodwill in business relationships as well as promote our brand, but can also create (or the appearance of) improper influence.

While we allow reasonable and appropriate hospitality given to or received from third parties, employees are strictly prohibited from accepting anything that might influence their judgement on any business activities, current or future; or that might be accompanied by an understanding the recipient is in any way obligated to take action that may benefit the provider of such gifts.

Ethical Business Policy

Modern Slavery and Human Trafficking

Slavery and Human Trafficking is a total infringement on fundamental human rights and so we continue to work with the highest ethical principles in mind.

We understand that empowering employees with information can aid their future actions and judgements therefore we strive to maintain awareness of slavery and human trafficking by training our staff in identifying potential risks, protecting whistle-blowers and making our policies available to all in our company handbook.

We pre qualify all suppliers or sub contractors through a series of due diligence checks, relating to company performance, HS&E compliance and references from other customers to establish that they are suitable and place comparable emphasis on ethical business practices.

Your Responsibility

Every OD employee has a responsibility to support us in our mission to be continuously ethical, complying with our values, our policy and all relevant legislation.

We ask everyone to consider their actions carefully and seek guidance in times of uncertainty.

Any breach, or suspected breach of this policy or our practices should be reported to your Line Manager or HR as soon as reasonably possible. All reports of this nature will be treated as strictly confidential.



Jon Kearney
Managing Director

Date 03/04/2020