bpmckeefry

mts
tank cleaning

Code of Business Ethics

Policy Statement

General statement

1.1 This Code of Business Ethics sets out the standards B.P. McKeefry Limited (including MTS (Tank Cleaning) Ltd), ("the Company") expect from our employees in their internal and external dealings with colleagues, customers, stakeholders and third parties.

Basic Standards of Conduct

2.1 We will conduct every aspect of our business with honesty, integrity and openness, respecting human rights and the interests of our employees, customers and third parties.

2.2 We will respect the legitimate interests of third parties with whom we have dealings in the course of our business.

2.3 We will maintain the highest standards of integrity - for example, we will not promise more than we can reasonably deliver or make commitments we cannot or do not intend to keep.

Employees

We are committed to:

3.1 developing a workforce where there is mutual trust and respect, free from bullying and harassment, where every person feels responsible for the performance and reputation of our company;

3.2 respecting the rights of individuals their customs and traditions and their right to freedom of association and the right to decide whether or not to join a trade union. We will negotiate in good faith with properly elected representatives of our employees;

3.3 recruiting, employing and promoting employees on the basis of objective criteria and the qualifications and abilities needed for the job to be performed in line with our Equal Opportunities and Diversity Policy;

3.4 maintaining good communications with employees through our information and consultation procedures;

3.5 providing our employees with suitable training and assisting them in realising their potential;

3.6 ensuring the privacy and confidentiality of our employees' personal information is respected;

3.7 suitably rewarding our employees for their contribution to the success of the business;

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3.8 providing mechanisms whereby employees can raise legitimate concerns confidentially regarding malpractice and ensuring no one will be victimised for a report made in good faith;

3.9 providing employees with the appropriate information and training to comply with this Code and the associated policies; and

3.10 seeking to protect our employees from third party abuse that might be injurious to their safety, health or well-being.

Business Integrity

4.1 We aim to develop strong relationships with our suppliers, stakeholders and others with whom we have dealings, based on mutual trust, understanding and respect.

4.2 In those dealings, we expect those with whom we do business to adhere to business principles consistent with our own.

4.3 We will conduct our operations in accordance with the principles of fair competition and applicable regulations.

4.4 The Company's accounting and other records and supporting documents must accurately describe and reflect the nature of the underlying transactions.

4.5 No unrecorded account, fund or asset will be established or maintained.

4.6 We will comply with the laws and regulations applicable wherever we do business. We will obtain legal advice where felt necessary to comply with this commitment.

4.7 We will review and track our business risks including social and environmental risks.

4.8 The Company will not facilitate, support, tolerate or condone any form of money laundering.

4.9 We will employ procedures designed to prevent the criminal facilitation of tax evasion under Criminal Finances Act by an associated person. These procedures will identify and mitigate tax evasion facilitation risks. Examples of procedures in place supporting this clause are:

i. Due diligence assessment is undertaken of all customers and suppliers. This assessment will identify if an associated person has the motive, opportunity or means to criminally facilitate tax evasion. Management approval is required for all new customers and suppliers.

ii. Continuous strong financial controls will manage any risks identified at point (i), above.

iii. Do not operate a bonus culture that rewards excessive risk taking.

iv. Clear reporting procedures for whistle-blowing of suspected facilitation of tax evasion offences. *Refer to CP22 – Whistleblowing Policy.*

v. Zero tolerance towards the criminal facilitation of tax evasion with this offence being categorised as Gross Misconduct. *Refer to IP17, Disciplinary Procedure.*

4.10 To ensure that our business is run in an ethical and effective manner we will maintain internal controls in line with the Company's Minimum Standards of Business Control.

National and International Trade

5.1 We will seek to compete fairly and ethically within the framework of applicable competition and anti-trust laws and we will not prevent others from competing fairly with us.

5.2 We will comply with all applicable export control laws and sanctions when conducting business around the world.

Personal Conduct

6.1 All employees are expected to behave in accordance with the principles set out in this Code of Business Ethics.

6.2 Employees are expected to protect and not misuse company assets such as buildings, vehicles, equipment, cash and procurement cards.

6.3 Employees are expected to use e-mail, internet, IT and telephones in a manner appropriate for business purposes in line with the principles contained in this Code and any applicable IT policies.

Bribery, Intimidation and Extortion

7.1 No Company employee or individual or business working on our behalf must accept or give a bribe, facilitation payment or other improper payment for any reason.

7.2 This applies to transactions with government officials, any private company or person anywhere in the world. It also applies whether the payment is made or received directly or through a third party.

7.3 The Company shall ensure that adequate procedures are in place to prevent the risk of bribery and that these are effectively communicated and implemented across the Company in line with the requirements of the Bribery Act.

Gifts, Entertainment and Improper Payments

8.1 Accepting or giving any entertainment or gift that is designed to, or may be seen to influence business decisions, is not acceptable.

8.2 No Company or employee shall offer, give, seek or receive, either directly or indirectly, inducements or other improper advantages for business or financial gain. If an employee is in any doubt as to whether he or she may accept an offer, that employee should discuss the issue with his or her manager.

Conflicts of Interest

9.1 Whilst we respect the privacy of our employees, all Company employees are expected to avoid personal relations, activities and financial interests which could conflict with their responsibilities to the Company.

9.2 Company employees and consultants must not seek gain for themselves or others through misuse of their positions or Company property.

9.3 All actual and potential conflicts (including those arising from the activities or interests of close relatives or partners) should be disclosed to and discussed with an employee's line manager.

9.4 Employees who have access to price sensitive information are prohibited from sharing this information to third parties.

We do not tolerate modern slavery (as defined by the Modern Slavery Act)

10.1 Modern slavery (that is, slavery, servitude, forced and compulsory labour, and human trafficking) is a crime and a violation of human rights. B.P. McKeefry Limited has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in any of its supply chains.

10.2 The Modern Slavery Act ("The Act") is focused on tackling human trafficking and slavery, but also introduces an obligation on companies to be more transparent in their dealings with supply chains. B.P. McKeefry Limited is committed to meeting its obligations under the Act in both its business and supply chains.

B.P. McKeefry Limited's supplier contracts include an explicit prohibition against the use of forced or trafficked labour. The Company expects its suppliers to hold their own suppliers to the same high standards.

Confidentiality

11.1 Information received by anyone in the course of his or her employment must not be used for personal gain or for any purpose other than that for which it was given.

11.2 Where confidential information is obtained in the course of business that confidentiality must be respected.

Political Activity

12.1 The Company does not make any donations to political parties or take part in party politics. However, when dealing with Government we do make legitimate concerns known and will seek to influence Government in relation to issues that could affect us, our shareholders, our customers or the local community. These relationships are conducted in accordance with this Code.

Health and Safety

13.1 We are committed to creating and maintaining a safe and healthy working environment for our employees, customers and the community.

13.2 We strive to avoid emergency situations but recognise the need to be prepared. We are committed to having effective emergency response procedures in place.

The Environment

14.1 The Company is committed to making continuous improvement in the management of its environmental impact as set out in our Environment Policy.

14.2 All employees are expected to adhere to the requirements of the local environmental management system and support the improvement in our environmental performance.

Customers

15.1 The Company is committed to providing safe, value for money, high quality, consistent, accessible and reliable services to its customers.

15.2 All employees are expected to behave respectfully and honestly in all their dealings with customers and the general public in accordance with the principles set out in this Code.

15.3 In particular we will safeguard and protect the welfare of vulnerable people who come into contact with our employees.

15.4 Employees will be made aware that they hold a position of trust and that they must at all times maintain the highest standards of personal conduct that reflects this trust being placed with them.

Shareholders

16.1 The Company will conduct its operations in accordance with the principles of good corporate governance.

16.2 We will provide timely, regular and reliable information on the business to all our shareholders.

Supply Chain

17.1 We purchase a wide range of goods and services required in the operation of our business and we also rely heavily on a number of key suppliers for the delivery of our core services. Good working relationships with our suppliers are therefore central to the success of our business.

17.2 Whilst we are committed to obtaining and retaining competitive goods and services we will at the same time seek to ensure they are from sources that have not jeopardised human rights, safety or the environment.

17.3 We expect our suppliers to adhere to business principles consistent with our own. We expect them to adopt and implement acceptable safety, environmental, product quality, product stewardship, labour, human rights, child labour, social and legal standards.

17.4 We will seek to work with our suppliers to develop long-term meaningful relationships to benefit both parties with the aim of improving the quality, environmental performance and sustainability of goods and services.

Community Involvement

18.1 Our operations touch members of the community daily, whether as customers, neighbours, employees, businesses or residents. We are committed to fostering good relationships with the communities in which we work and building community partnerships that deliver positive change.

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Breaches of Company Policy

19.1 In the event of breaches in this policy, these will be dealt with in accordance with the Company disciplinary procedure.

Authorised by,

Signed: _____ **Date:** 10.03.2020

Peter Esler
(Managing Director) **Review Date:** 31.03.2021