

## **Code of Business Conduct**

ECM (Vehicle Delivery Service) Ltd, hereafter referred to as “ECM”, is committed to ensuring that its business activities are conducted in all respects according to ethical, professional and legal standards. ECM will conduct its business in a competent, fair, impartial, and efficient manner.

This policy sets out the principles and values that ECM will support and be guided by in the conduct of its business. This policy applies to all employees and details the rules and standards that everyone employed by ECM follows. Furthermore, ECM expects equivalent standards of conduct from its business partners, suppliers, supply chain partners, and stakeholders.

ECM and its employees will at all times demonstrate the highest levels of integrity, truthfulness, and honesty in order to uphold both personal and corporate reputations and to inspire confidence and trust in their respective actions.

The objectives of this policy are set out below. In all dealings ECM will:

- Comply with the ECM Anti-Corruption and Bribery Policy
- Comply with all applicable laws, rules and regulations
- Engage in honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships
- Comply with the ECM Competition Law Policy and Manual
- Comply with the ECM Modern Slavery Act Statement
- Maintain effective procedures to prevent confidential information being misused and make it clear that the use of confidential information for personal and corporate gain will not be tolerated
- Comply with the ECM Health and Safety Policy
- Report any fraudulent activities and maintain accurate company records to help prevent their occurrence
- Comply with the ECM Supplier Sustainability Policy
- Comply with the ECM Corporate Philosophy Policy
- Comply with the ECM Our Promise to Customers Policy
- Comply with the ECM Environmental Management Policy

## **Employees**

ECM is committed to high standards of employment practice. ECM will:

- Ensure there is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation
- Provide a clean, healthy and safe work environment
- Provide fair and just remuneration packages
- Not tolerate any sexual, physical or mental harassment, or victimisation of employees
- Comply with the ECM Modern Slavery Act Statement
- Not tolerate or engage in child labour
- Not tolerate or engage in forced, bonded or involuntary prison labour

## **Government, Regulators, and Legislators**

ECM will seek to comply with all international, national, and local legislation affecting its operations. ECM will not make any financial contributions or offer support to any political party. ECM will strive to follow the best practice in corporate governance. ECM will meet its tax obligations.

## **Health and Safety**

ECM is committed to providing a safe and healthy environment for all of its employees, visitors, suppliers and stakeholders. Further information can be found in the ECM Health and Safety Policy.

## **Environment**

ECM respects the environment and the need to protect it and minimise the impact its operations have on it.

ECM is engaged in a continuous programme of improvement on environmental issues, for example Eco Driving training for its car transporter drivers. Further information can be found in the ECM Environmental Management Policy.

## **Competitors**

ECM, has, and will, continue to build its reputation on the basis of its performance alone. ECM will compete vigorously and lawfully, and will not compete unfairly with others. In doing so, ECM will:

- Avoid disclosing proprietary or confidential information in any contact with competitors
- Not attempt to acquire information regarding a competitors' business by unlawful means, including industrial espionage, urging competitors' employees to disclose confidential information, or any other approach that is not above board
- ECM will not seek to damage the reputation of its competitors either directly or by implication
- Act at all times in accordance with its Competition Law Policy and Manual

## **Giving and Receiving Gifts, Hospitality and Entertainment**

The ECM Anti-Corruption and Bribery Policy details ECM's procedures and rules in respect of giving and receiving gifts, hospitality, and entertainment.

## **Bribery and Corruption**

ECM does not allow the direct or indirect offer, payment, solicitation, or acceptance of bribes in any form. ECM has a separate Anti-Corruption and Bribery Policy which outlines the procedures all employees must follow to avoid involvement in any situation which might lead to non-compliance of this policy.

Clause 8.4 of the ECM Anti-Corruption and Bribery Policy makes it clear that any employee found to be involved in any kind of corrupt practice will be subject to disciplinary action, which may result in dismissal.

## **Customers**

ECM is committed to building long term partnerships with its customers.

This is detailed more specifically in ECM's 'Our Promise to Customers Policy' and 'Corporate Philosophy Policy'. ECM will be honest and straightforward in its customer dealings and engagement at all times. ECM will:

- Treat customers fairly, openly and as we would want to be treated
- Provide helpful and responsive actions

- Respect the confidentiality of information that we might obtain and retain in relation to customers
- Provide high standards of service
- Take all reasonable care to avoid untruths, concealment and overstatement in advertising and other public communications
- Respect our customer contracts
- Operate an effective complaints process to deal with situations where these standards are challenged

### **Suppliers of Goods and Services**

ECM is committed to developing long term successful relationships with the best suppliers of goods and services, based on mutual trust and shared values. When purchasing goods and services ECM will:

- Comply with the ECM Supplier Sustainability Policy
- Maintain high standards of integrity in business relationships
- Ensure that all employees conduct business with suppliers of goods and services in a professional manner
- Encourage suppliers to operate with values and principles equivalent to ours
- Strongly encourage suppliers to innovate and improve the quality of their goods or services
- Comply with the ECM Anti-Corruption and Bribery Policy
- Choose suppliers on the basis of factors such as price, quality, delivery, service, innovation, environmental impact and integrity
- The company's choice of suppliers will be made objectively
- Rigorously apply the principles of honesty and openness
- Comply with the ECM Modern Slavery Act Statement

### **Local Community and Non-Governmental Organisations**

In its operations, ECM aim to build respectful, balanced, long-lasting relationships with the communities in which we operate.

ECM will endeavour to take into consideration the concerns of the wider community, including both national and local interests, and will engage with local communities to ensure ECM understands their needs and the impact of its day-to-day operations.

## **Compliance with this Policy**

As a market leader in vehicle logistics, ECM aims to maintain the highest ethical standards when carrying out its business activities. Practices of any sort that are incompatible with the principles of this policy, and any other ECM policies, will not be tolerated.

Responsibility for compliance with this policy rests with the ECM Board of Directors. The ECM Board of Directors will ensure that it is communicated to and understood by all employees.

Failure to comply with this policy may lead to disciplinary actions and, where breaches of the law take place, may lead to criminal proceedings against the individual or individuals involved.

## **Approved by the Board of Directors**

ECM (Vehicle Delivery Service) Ltd  
The Airport  
Carlisle  
United Kingdom, CA6 4NW

6<sup>th</sup> December 2019

Copyright ©: ECM (Vehicle Delivery Service) Ltd