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 and 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 Anti-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
- Comply with the ECM Privacy Standard

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
- Respect any land, forest or water rights and shall not carry out any forced evictions
- Not employ or use private or public security forces with regard to any employment or human rights issues

Financial Responsibility, 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, and will maintain accurate records of its financial matters and ensure its accounts are independently audited.

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

Privacy / Data Protection / GDPR / Intellectual Property

ECM will apply the provisions of its Privacy Standard across the organisation. ECM will ensure compliance with the Global Data Protection Regulations (GDPR). ECM will respect intellectual property rights in all aspects of its day-to-day business operations.

Bribery and Corruption / Business Ethics

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 Anti-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 Anti-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.

Counterfeit Parts, Export Controls and Economic Sanctions

The use of genuine/authorised parts is a key way of ensuring that safety in operation and performance can be maintained. As such, suppliers must only sell parts that are genuine and provided by/with authorisation from the original manufacturer. Any copies or counterfeit production of parts will not be tolerated. No suppliers operating in countries under export controls/economic sanctions will be dealt with, and all suppliers are reminded to ensure their own supply chain also adheres to this policy.

Whistleblowing

ECM is committed to building strong relationships with suppliers, encouraging high standards and effective communication when needed. This extends to the reporting of any unethical behaviour or breaches of any of ECM's codes of conduct/policies/the law, without limitation. ECM will ensure all disclosures regarding the conduct of an accused party/supplier will be dealt with confidentially and with the utmost discretion – anonymity will be retained unless obliged to disclose the identity of any individual involved (i.e. under legal proceedings). Any identified breaches of ECM's codes of conduct/policies/the law by any supplier will result in the immediate cessation of any business relationship.

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 Anti-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
- Maintain highest standards of business ethics

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

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