

Business Conduct Policy

Purpose

arrangeMY is committed to conducting all business activities with integrity, transparency, and professionalism.

This Business Conduct Policy sets out the standards of behaviour expected from all employees, directors, contractors, suppliers and business partners, ensuring we operate ethically, responsibly and in full compliance with applicable laws and regulations.

This policy forms part of our wider governance framework and supports our ESG commitments, with strong links to our Ethical Trading, Sustainable Procurement, Modern Slavery & Anti-Bribery Policy.

Scope

This policy applies to:

- All employees, directors, and temporary workers
- Contractors, agents, intermediaries and consultants
- Suppliers, partners and third parties acting on behalf of arrangeMY

Compliance with this policy is a condition of employment and of doing business with arrangeMY.

Our Core Principles

We are committed to:

- Acting with honesty, integrity and fairness
- Complying with all applicable laws and regulations
- Respecting human rights and fair labour practices
- Preventing bribery, corruption and unethical conduct
- Promoting sustainability and responsible procurement
- Maintaining transparency and accountability in all business dealings

Legal & Regulatory Compliance

All individuals covered by this policy must comply with:

- The UK Bribery Act 2010
- The UK Modern Slavery Act 2015
- Applicable employment, environmental, and data protection laws
- Relevant industry standards and codes of practice

Ethical Behaviour and Integrity

arrangeMY operates a zero-tolerance approach to:

- Fraud, bribery and corruption
- Modern slavery and human trafficking
- Unethical or illegal conduct
- Abuse of position or conflicts of interest

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All business decisions must be made objectively and in the best interests of the organisation.

Anti-Bribery and Corruption

- Prohibited Conduct

It is strictly prohibited to:

- Offer, give, request or accept bribes or inducements
- Make facilitation payments
- Use third parties to gain an improper advantage

- Gifts and Hospitality

- Must be reasonable, proportionate and transparent
- Must not influence or appear to influence business decisions
- Must comply with company approval processes

- Conflicts of Interest

All employees must:

- Declare any actual or potential conflicts of interest
- Avoid situations where personal interests conflict with business interests
- Act transparently in all dealings

Human Rights and Ethical Labour Standards

MY is committed to upholding human rights across our operations and supply chain.

We prohibit:

- Forced, bonded or involuntary labour
- Child labour
- Discrimination or harassment
- Inhumane or degrading treatment

We require:

- Fair wages and working conditions
- Safe and hygienic workplaces
- Freedom of employment and worker rights

Modern Slavery and Supply Chain Responsibility

We maintain a **zero-tolerance approach** to modern slavery and human trafficking.

Our Commitments

- Conduct risk-based due diligence on suppliers
- Monitor and audit supply chain practices
- Address identified risks through corrective action
- Terminate relationships where serious breaches occur

Suppliers are required to:

- Comply with relevant legislation
- Maintain transparent and ethical supply chains
- Demonstrate adherence to ethical labour standards

Sustainable Procurement and Environmental Responsibility

We are committed to sourcing goods and services responsibly and sustainably.

We will:

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- Select suppliers based on ethical and environmental criteria
- Promote low-carbon and sustainable options
- Reduce environmental impact across operations
- Support circular economy principles and waste reduction

All procurement activities must follow approved processes and authorisation procedures.

Risk Management and Due Diligence

We adopt a risk-based approach to business conduct, including:

- Supplier due diligence and pre-qualification checks
- Ongoing monitoring and audits
- Assessment of operational, financial, legal and ESG risks

Risk categories include:

- Compliance and regulatory risk
- Reputational risk
- Supply chain and operational risk
- ESG and environmental risk

Speak-Up and Whistleblowing

arrangeMY encourages a culture of openness and accountability.

We provide confidential channels for reporting concerns relating to:

- Bribery, corruption or fraud
- Modern slavery or labour exploitation
- Ethical or legal breaches

All reports will be:

- Taken seriously and investigated promptly
- Treated confidentially
- Managed without retaliation against the reporter

Training and Awareness

We are committed to ensuring awareness of this policy through:

- Regular employee training on ethics, compliance and anti-bribery
- Supply chain engagement and communication
- Ongoing updates on legal and regulatory requirements

Training records will be maintained and reviewed periodically.

Monitoring, Compliance and Enforcement

Compliance with this policy is monitored through:

- Internal audits and reviews
- Supplier assessments and KPI tracking
- Risk assessments and management oversight

Breaches of this policy may result in:

- Disciplinary action (for employees)
- Termination of contracts (for suppliers/partners)

Roles and Responsibilities

- Managing Director – Overall accountability for business conduct

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- Business Services Director / Leadership Team – Policy implementation and oversight
- Managers – Ensuring compliance within their teams
- Employees and Contractors – Following policy and reporting concerns

This policy will be reviewed every 12 months from April 2026

Signed:

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Dated: 21/04/26

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