



Ethical Conduct Policy

Reflect Consulting is committed to maintaining a high standard of ethical conduct. This policy will establish standards for ethical conduct for employees and consultants.

Reflect Consulting employees and consultants should monitor their environment and report to Reflect Consulting any breach of this policy by suppliers, clients, employees, or consultants.

1 *Bribery/anti-corruption*

- 1.1 Reflect Consulting condemns all forms of bribery and corruption, and is committed to never engaging in bribery and/or corruption

2 *Child labour*

- 2.1 Reflect Consulting complies with the United Nations ILO (International Labour Organisation) Conventions which prohibit illegal and hazardous child labour

3 *Rates of pay*

- 3.1 Reflect Consulting believes that all employees in all forms of employment must be paid the correct pay for time worked (this must not be below the national minimum wage)
- 3.2 Reflect Consulting respects the workforce rights to freedom of association and collective bargaining of all employees
- 3.3 These conditions apply to both direct employees and contractors

4 *Supply chains*

- 4.1 Reflect Consulting will take reasonable steps to ensure it has visibility on its supplier's supply chains



- 4.2 Reflect Consulting, its employees and consultants will not knowingly source any materials from suppliers who are in conflict with this policy

5 *Human trafficking & modern slavery*

- 5.1 Reflect Consulting is aware of the risks related to human trafficking and modern slavery, and will take reasonable steps to ensure that this is not present in its suppliers' organisation

- 5.2 Reflect Consulting, its employees and consultants, will not knowingly engage with organisations who are in conflict with this policy

6 *Discrimination*

- 6.1 Reflect Consulting, its employees and consultants, condemns all forms of unfair or illegal discrimination based on race, nationality, religion, gender, age, sexual orientation, disability, ancestry, social origin, trade union membership, political belief or any other bias and is committed to never engaging in such forms of discrimination

7 *Trade & financing*

- 7.1 Reflect Consulting is committed to comply with applicable laws related to anti-money laundering, anti-terrorism financing, and trade regulations

8 *General*

- 8.1 Based on reported incidents and risk, Reflect Consulting may provide training to its employees and consultants in support of this policy