



# Code of Conduct and Ethics

V1.0



**Together We Grow**

## A message from our Managing Director



At The West Group Limited, we are committed to doing business the right way, guided by our core company values united under the principle of **“Together We Grow”**. These values are at the heart of everything we do and define how we interact with our employees, customers, suppliers, and the wider community.

This **Code of Conduct and Ethics** sets out the principles that govern our behaviour, actions, and decisions. It reflects our unwavering commitment and expectations of integrity, transparency, and respect in all aspects of our operations.

By working together under a shared set of values, we strive to create an environment where collaboration thrives, customer relationships are strengthened, and forward-thinking ideas drive continuous improvement.

We thank you for joining us in upholding these principles and ensuring that The West Group Limited remains a trusted and respected organisation.



**Richard Oddy**

# Contents

<b>1</b>	<b>OUR VALUES: UNITED UNDER THE PRINCIPLE OF “TOGETHER WE GROW”</b>	<b>4</b>
1.1	Team	4
1.2	Customer	4
1.3	Innovation	4
<b>2</b>	<b>TEAM</b>	<b>6</b>
2.1	Diversity, Equality and Inclusion	6
2.2	Harassment, Sexual Harassment and Bullying	6
2.3	Health and Wellbeing	6
2.4	Human Rights	7
2.5	Charitable Activity and Volunteering	7
2.6	Safety and Conduct	7
<b>3</b>	<b>CUSTOMER</b>	<b>8</b>
3.1	Conflicts of Interest	8
3.2	Competition	8
3.3	Bribery and Corruption	8
3.4	Slavery, Human Trafficking and Child Labour	9
3.5	Financial Crime	9
3.6	Trade Sanctions and Import/Export Controls	9
3.7	Conflict Minerals and Conflict Zones	9
<b>4</b>	<b>INNOVATION</b>	<b>10</b>
4.1	Environment and Stability	10
4.2	Intellectual Property	10
4.3	Confidential Information	10
4.4	Personal Data Protection	11
4.5	Cyber Security	11
4.6	Accreditations	11
4.7	Continuous Improvement	11
<b>5</b>	<b>WHISTLEBLOWING</b>	<b>12</b>
5.1	Integrity, Transparency and Accountability	12
5.2	Reporting Concerns	12
<b>6</b>	<b>APPLICABLE LEGISLATION</b>	<b>13</b>

# 1

## OUR VALUES: UNITED UNDER THE PRINCIPLE OF “TOGETHER WE GROW”

### 1.1 Team

**RESPECTFUL**  
**INCLUSIVE**  
**COLLABORATIVE**

- Respecting and learning from each other
- Empowering each other to be open and honest
- Holding ourselves and each other accountable
- Celebrating successes and learning from our mistakes
- Breaking down silos and encouraging collaboration

### 1.2 Customer

**BEST IN CLASS**  
**AGILE**  
**ACCOUNTABLE**

- Putting the customer at the heart of everything we do
- Creating an environment of mutual trust and reliability
- Maintaining a quality mindset
- Being agile allows us to adapt quickly to our customers' needs
- Prioritising organisational and customer needs over personal goals

### 1.3 Innovation

**COURAGEOUS**  
**EVOLVING**  
**ENTREPRENEURIAL**

- Using the customer voice to deliver future innovation
- Promoting a culture where learning, skill development and curiosity are prioritised
- Allowing room for experimentation, risk taking and learning from our mistakes
- Persevering through setbacks with a growth mindset and determination to improve
- Challenging the status quo and striving for continuous improvement



**These values guide how we work with one another and with our wider network of suppliers, contractors and customers.**

All employees, suppliers, contractors, and customers representing or working with The West Group Limited are expected to act lawfully and ethically in all business activities, treat others with fairness, dignity, and respect, protect company assets and confidential information, and raise concerns when something does not feel right.

Compliance with this Code is a mandatory requirement of doing business with or on behalf of The West Group Limited. While this Code does not form part of any employment or supply contract, breaches may result in immediate termination of contracts, removal from approved supplier lists, and/or legal action. We reserve the right to audit compliance, require corrective actions, and report unlawful conduct to relevant authorities.

We will review and update this Code regularly to reflect changes in law, business practices, and company requirements, ensuring it continues to support our values.



## 2 TEAM

### 2.1 Diversity, Equality and Inclusion

We are committed to creating an environment where diversity is valued, equality is upheld, and inclusion is actively promoted. Everyone working with or representing The West Group Limited must treat others fairly and with respect, regardless of background, identity, or personal characteristics. Discrimination of any kind is unacceptable, and inclusive practices are required in all interactions.

### 2.2 Harassment, Sexual Harassment and Bullying

We are committed to maintaining a workplace free from all forms of harassment, including sexual harassment and bullying while ensuring that every individual is treated with dignity and respect. This commitment applies not only within our physical workplace(s) but also in any work-related setting, such as business trips, events, and social functions. No one should experience intimidation, hostility, or inappropriate behaviour when working with or for The West Group Limited. We require those who work with or represent us to actively prevent harassment, sexual harassment and bullying and to take prompt, proactive steps to address any concerns.

### 2.3 Health and Wellbeing

We support the physical and mental health of our employees by providing access to the appropriate resources and fostering a culture of openness and care. We expect those who work with or represent us to uphold similar standards within their own organisations.

## 2.4 Human Rights

We uphold and promote fundamental human rights across our operations, including fair wages, reasonable working hours, and the right to freedom of association. We expect those who work with or represent us to respect these principles and implement similar standards within their own organisations.

## 2.5 Charitable Activity and Volunteering

We encourage participation in charitable initiatives and volunteering, with known and trusted partners. However, the use of company resources, including time, funds, facilities, or branding, for charitable activities requires prior written approval to ensure alignment with our values and business commitments.

## 2.6 Safety and Conduct

We are committed to maintaining a safe, healthy, and respectful environment for everyone working with or representing The West Group Limited. All employees, contractors, and visitors must follow our health and safety policies, act responsibly to protect themselves and others, and report any hazards, incidents, or concerns promptly. Attending our premises under the influence of drugs or alcohol is strictly prohibited and we also enforce a zero-tolerance approach to violence, threats, intimidation, or any behaviour that compromises safety or wellbeing.



## 3 CUSTOMER

### 3.1 Conflicts of Interest

We uphold the highest standards of transparency and integrity in all our business dealings. Those working with or representing us must avoid situations where personal interests' conflict, or could reasonably be perceived to conflict, with the interests of The West Group Limited, including those involving family or close relationships. These must be disclosed promptly and fully for assessment and resolution.

### 3.2 Competition

We believe in fair and open competition and do not tolerate anti-competitive practices such as price fixing, market sharing, or bid rigging. Those working with or representing us must act in a manner that supports integrity and transparency in the marketplace.

### 3.3 Bribery and Corruption

We hold zero tolerance for bribery and corruption. All business dealings must be conducted honestly and transparently. Those who work with or represent us shall not offer, give, solicit, or accept bribes or improper payments. Any gifts or hospitality must be declared in accordance with our internal policy and must never influence, or appear to influence, business decisions. Those who work with or represent us must implement robust processes to ensure thorough due diligence and strict compliance with the applicable laws and regulations.

### **3.4 Slavery, Human Trafficking and Child Labour**

We hold a zero tolerance approach to slavery, human trafficking, and child labour within our organisation and across our supply chains and are committed to protecting human rights. Those who work with or represent us must conduct thorough due diligence, implement effective controls, and where legally required, must publish a Modern Slavery Statement.

### **3.5 Financial Crime**

We are committed to ensuring that our organisation is never used for financial crime, including fraud, money laundering or tax evasion. Those who work with or represent us must remain vigilant, comply with all applicable laws and regulations, and must not engage in, support, or enable any form of dishonest or unlawful financial or tax-related practices.

### **3.6 Trade Sanctions and Import/Export Controls**

We ensure compliance with all applicable trade sanctions, embargoes, and export control regulations. Those who work with or represent us must implement robust processes to ensure thorough due diligence and strict compliance with the applicable laws and regulations. Any activity that violates these laws or attempts to circumvent sanctions is strictly prohibited.

### **3.7 Conflict Minerals and Conflict Zones**

We are committed to responsible sourcing practices that do not contribute to conflict, human rights abuses, or environmental harm. Those who work with or represent us must trace and verify the origin of minerals used in products and ensure compliance with internationally recognised standards. Evidence of due diligence must be provided upon request.



## 4 INNOVATION

### 4.1 Environment and Stability

We are committed to minimising our environmental impact through sustainable practices, including energy efficiency, waste reduction, and responsible sourcing. We actively encourage innovation and continuous improvement in sustainability initiatives and expect those who work with or represent us to share this commitment and ensure their operations promote environmental responsibility and resource efficiency.

### 4.2 Intellectual Property

We regard intellectual property as a vital business asset and are committed to safeguarding the rights and intellectual property of both our organisation and others. Those who work with or represent us must safeguard Intellectual property, including trademarks, copyrights, patents, and trade secrets and respect the rights of others. Any use of our Intellectual Property must be properly authorised and comply with applicable written agreements. This obligation shall continue after the business relationship ends.

### 4.3 Confidential Information

We recognise that safeguarding confidential information is fundamental to our operations and essential for fostering strong, trustworthy relationships with those we work alongside. Those who work with or represent us must not disclose, misuse or permit unauthorised access to confidential information and to have implemented the appropriate safeguards to prevent breaches. This obligation shall continue after the business relationship ends.

## 4.4 Personal Data Protection

We are committed to upholding the highest standards of data protection and safeguarding individuals' privacy rights. All those working with or representing us must handle personal data lawfully, fairly, and securely and in compliance with applicable laws and where applicable, our internal policies. They must also implement appropriate technical and organisational measures to protect personal data. Any suspected or actual data breaches must be reported immediately.

## 4.5 Cyber Security

We are committed to protecting systems and data against unauthorised access, breaches, and other cyber threats. All those working with or representing us must implement robust cybersecurity measures, such as Cyber Essentials or an equivalent standard, to ensure the security of information and technology assets.

## 4.6 Accreditations

We take pride in having acquired the following accreditations:



## 4.7 Continuous Improvement

As part of our ongoing commitment to continuous improvement, we are actively working towards achieving **ISO/IEC 27001**: Information Security Management Systems, **ISO 45001**: Occupational Health and Safety Management Systems, **ISO 14001**: Environmental Management Systems.

These internationally recognised certifications will reaffirm our ethical commitment to uphold best practices, maintain regulatory compliance, and demonstrate our dedication to the well-being of everyone we work with.



## 5 WHISTLEBLOWING

### 5.1 Integrity, Transparency and Accountability

The West Group Limited is committed to upholding the highest standards of integrity, transparency, and accountability. We encourage anyone to report concerns regarding unethical conduct, compliance breaches, or misconduct, including matters that may constitute a 'protected disclosure' under the Public Interest Disclosure Act 1998.

All reports will be treated as confidential to the extent possible. In some cases, we may be legally required to share information with external authorities. Individuals who raise concerns in good faith with a reasonable belief that the information tends to show wrongdoing will be protected from reprisal or detriment.

All concerns will be taken seriously and investigated appropriately.

### 5.2 Reporting Concerns

Email: [whistleblowing@westgroup.co.uk](mailto:whistleblowing@westgroup.co.uk)

Independent whistleblowing charity: [protect-advice.org.uk](http://protect-advice.org.uk)

Scan the QR below to fill out a report form. The form will not automatically collect your name and email address; we ask that you provide these details.





## 6 APPLICABLE LEGISLATION

- All UN Universal Declaration of Human Rights
- Bribery Act 2010
- Companies Act 2006
- Competition Act 1998
- Control of Substances Hazardous to Health (COSHH) Regulations 2002
- Criminal Finances Act 2017
- Climate Change Act 2008
- Environmental Protection Act 1990 & UK Waste Regulations
- Data (Use & Access) Act 2025
- Data Protection Act 2018
- Economic Crime & Corporate Transparency Act 2023
- Employment Rights Act 1996
- Equality Act 2010
- EU Conflict Minerals Reg 2017/821
- Export Control Order 2008
- Regulatory Reform (Fire Safety) Order 2005
- Fraud Act 2006
- Health and Safety etc. at Work Act 1974
- Human Rights Act 1998
- International Labour Organisation (ILO) Fundamental Conventions
- Misuse of Drugs Act 1971
- Modern Slavery Act 2015
- Money Laundering Regulations 2017
- OECD Due Diligence Guidance
- Proceeds of Crime Act 2002
- Procurement Act 2023
- Public Interest Disclosure Act 1998
- Regulation (EU) 2016/679 – UK GDPR
- Sanctions & Anti-Money Laundering Act 2018
- Trade Union and Labour Relations (Consolidation) Act 1992
- UN Guiding Principles on Business and Human Rights
- Worker Protection Act 2023
- Management of Health and Safety Regulations 1999
- Environment Act 2021