

The background of the slide features a blurred office scene. In the foreground, two hands are clasped together in a firm grip. In the background, a person is seated at a desk with a laptop, and another person's hand is visible holding a pen over a document. The overall atmosphere is professional and collaborative.

Ganymede Code of Business Ethics

March 2024

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A message from Paul

"I am pleased to introduce you to the Ganymede Code of Business Ethics, which reflects our commitment to delivering excellence and upholding ethical standards.

Within the following sections, you will find a comprehensive framework built upon our Core Values that form the foundation of the Ganymede culture.

This Code outlines the key principles guiding our operations, addressing crucial aspects including safety, diversity, sustainability, and ethical business practices. Each member of our team plays a key role in maintaining these high standards and your commitment to doing the right thing, behaving responsibly, and treating people fairly is paramount to our ongoing success. This Code serves as a reference point, outlining the expectations we set for the business and ourselves.

Thank you for your commitment to maintaining these standards, your dedication is instrumental in creating a workplace where excellence and ethics go hand in hand."



Paul Crompton
Managing Director

Ganymede's Core Values

There is more to 'Doing the right thing' than just complying with the relevant standards and legislation and we strive to incorporate our Core Values in everything we do.



Safety First, Safety Always

Safety is at the forefront of our business operations. Awareness and continuous improvement eliminates complacency and ensures we keep our workforce, industry colleagues and communities safe.



Delivering Excellence

By continually building upon our vast industry knowledge and working collaboratively with our clients, we always deliver first class, innovative and tailored solutions with our client goals in mind.



Taking Pride

Every action taken by the organisation is done with skill, care and pride in mind. This ensures that every level of the organisation is accountable and provides the best possible service.



People are our Passion

People are at the heart of everything we do. Through our in-depth recruitment processes, we attract, develop and retain the best people, supporting our clients to deliver projects safely and efficiently.



Socially Responsible

We care about local communities and are committed to attracting and retaining diverse talent. We strive to support charities and good causes and take care of the environment by operating ethically and sustainably.

Health, Safety and Wellbeing

Ganymede believe we are all responsible for creating a safe work environment, we set policies and procedures that we expect everyone to work to, to help us to create that environment. Accidents and incidents cause distress and sometimes personal injury which can have very serious consequences, ensure you are familiar with risk assessments in place and that work is undertaken in accordance with them.

Our processes aim to minimise workplace risks in accordance with the Health and Safety at Work Act 1974 and other associated legislation, but safety is not just the responsibility of the company – it is your responsibility too.

If you have concerns about yours – or a anyone else's safety, please Speak Up!



Speak Up Campaign

Work safe procedure - Raise a close call if asked to carry out unsafe acts or you think what you are being asked to do puts you or others at risk of harm.

Wear correct PPE – Ensure you are wearing the correct PPE for the task, ask your team leader if you are unsure, make sure you look after your PPE and request replacements when it is no longer fit for purpose.

Take time out - Risk assess your environment and tasks before, during and after the work and ensure you raise any concerns.

Fit for duty - If you feel unwell or unfit whilst carrying out tasks, make sure you let your manager or team leader know.

Don't always follow the leader - Don't be afraid to speak up if you think something is not safe.

Don't ignore it, close call it - If you come across any unsafe acts or conditions, make sure you raise them through the Ganymede close call system.

Don't drive tired - Stop and Speak Up if you start feeling the effects of fatigue when driving.

It's ok to not be ok - Speak Up if you are feeling low, Ganymede has mental health first-aiders available you can speak to, or you can contact the Samaritans 24 hours a day on 116 123.

Equality, Diversity and Inclusion

We embrace Equality, Diversity and Inclusion (EDI) and strive to create a working environment where being open and honest and having a diverse viewpoint is valued, encouraged and rewarded. We aim to create a culture that fosters inclusion and diversity as we recognise the benefits this brings to all our employees, potential employees, contingent labour, business as a whole and the wider community.

We have a zero-tolerance approach to discrimination on the grounds of the nine protected characteristics, these being; race, sex, sexual orientation, gender reassignment, religion or belief, marital or civil partnership status, age, disability, or pregnancy and maternity.

We have an EDI Charter which helps to drive the approach we take to EDI along with an EDI policy. To improve EDI, both internally and for our clients, we continually review our recruitment process, including where we advertise our roles and how our adverts and job descriptions are worded, with the aim of making them gender neutral. We also train all our direct employees on the importance of EDI, the benefits that it brings and the law surrounding equality, this training sets our expectations and highlights the importance that EDI plays in our business.

On an annual basis we survey our entire workforce to understand how diverse we are as a business, this allows us to identify groups which are underrepresented, putting actions in place to rectify this underrepresentation. We also work with our clients to help them improve their EDI, discussing their specific requirements and how we can support them on their journey to becoming more diverse.

In addition, we have EDI Ambassadors from various areas of the business who meet quarterly to raise awareness and identify opportunities for improvement, they also review our EDI monitoring surveys and set objectives to improve the results.



Human Rights

Ganymede are committed to valuing and respecting each and every individual we work with, upholding human rights for everyone and taking steps to prevent modern slavery, human trafficking and labour exploitation within our business and supply chain and encourage our workforce to speak up and report concerns either through our closed call line, modern slavery reporting process or through our whistleblowing procedure.

We have introduced a number of processes and procedures to help us to protect ourselves and our supply chain from infiltration including our Modern Slavery Policy, Compliant Recruitment Principles, Responsible Recruitment Policy, Supplier Charter, Whistleblowing Procedure and Closed Call line.

We train our employees on Modern Slavery and how to report concerns and our champions regularly raise awareness of the ever-present risk and when taking on new suppliers or auditing our current suppliers we ask questions in relation to their approach to modern slavery, requesting copies of their policies and procedures.

Our dedicated Modern Slavery Steering group meets every quarter to review the actions we have taken to date including reviewing progress against our KPI's, and identifying and implementing further best practise.

Sustainability

At Ganymede, we recognise the responsibility we have for operating in a way that doesn't harm the planet or make life harder for future generations. As such, we work tirelessly with our colleagues, clients, and supply chain to ensure that sustainable practices are implemented to uphold the pillars of sustainability.

We have signed up to the United Nations backed Science Based Targets Initiative and the Supply Chain Sustainability School to better allow us to measure, record and reduce our Greenhouse Gas emissions in line with the Paris Agreement of 2016 and have committed to complying with the UK Government's Net Zero Strategy of achieving net zero carbon emissions by 2050 (2045 in Scotland).

Our policies and processes will be audited and benchmarked globally to ensure we are operating in an ethical and transparent way and to ensure any future risks are identified and negated as efficiently as possible.

We engage with our supply chain, ensuring that they are able to achieve their own sustainability targets through the sharing of best practice, technology, and supply agreements.

And finally, in line with our values, we passionately believe in creating a positive impact on the well-being of all colleagues and communities we interact with through training, risk management and transparent communication.

Collaborative Working

At Ganymede, our commitment to collaborative working is deeply rooted in our core value of 'delivering excellence.' With a focus on placing our stakeholders at the forefront of our endeavours, we continually enhance our industry knowledge to craft first-class, innovative, and tailored solutions. Our approach involves working closely with clients to align our strategies with their goals, ensuring the delivery of unparalleled value.

We recognise that successful business relationships are the cornerstone of our achievements. Therefore, we actively cultivate and maintain strong connections with our candidates, clients, and stakeholders. Our supply chain partners are carefully selected and encouraged to share our core values and beliefs, with the aim of establishing an integrated approach that fosters enduring supplier relationships.

At Ganymede, we are dedicated to creating a collaborative culture that thrives on professionalism, support, and inclusivity. We understand that diverse perspectives drive innovation, and by fostering a supportive and inclusive environment, we encourage the maximum participation of every individual within our business. This commitment to collaboration not only enhances the quality of our solutions but also contributes to the overall success and sustainability of our partnerships.

Together, we build a foundation for excellence, where collaborative working is not just a practice but a philosophy that defines our organisational approach.

Real Living Wage

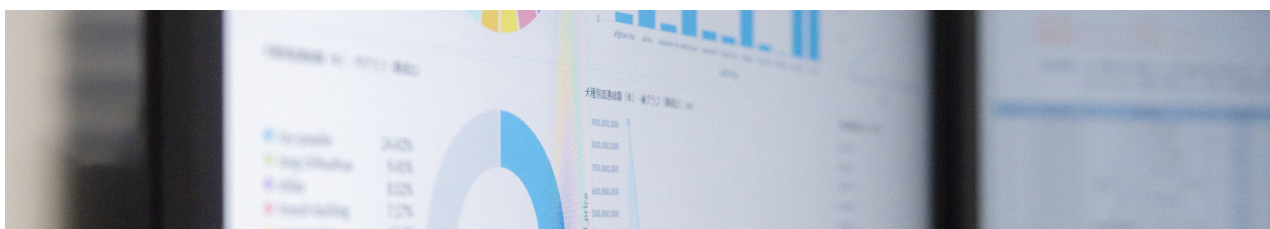
Ganymede have been certified by the Living Wage Foundation as a Living Wage Employer as we believe in the importance of taking a stand to ensure our employees and workers can earn a wage that is enough to live on.

We believe that paying the real Living Wage, as opposed to the government's minimum, makes a huge difference to our workforce as it can not only help improve productivity whilst at work, but also can have a huge impact to individual's mental health, relationships with family and more.



Data and Information

As an ISO 27001 accredited business, Ganymede protect ourselves, our stakeholders, client and employees by prioritising the importance of data protection and the management of information security. The security of information and other assets is regarded as fundamental for the successful business operation of Ganymede and as part of our commitment to protecting our data, Ganymede have implemented a stringent Information Security Management system (ISMS) that meets the requirements of the UK GDPR and ISO 27001:2013 to protect both the security and integrity of the data we process. All our employees are trained on the requirements of GDPR and Information Security to ensure they are fully aware of the requirements.



Anti-Bribery and Corruption

Ganymede is committed to the prevention of bribery and corruption and takes a zero-tolerance approach to any form of bribery. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships and implement and enforce effective systems to counter bribery. We uphold all laws relevant to countering bribery and corruption including the Bribery Act 2010.

We see bribery as an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

Ganymede will not:

**Offer or pay
bribes**

**Accept or give gifts or
hospitality which may
influence, or appear to
influence, our or other
businesses decisions or
outcomes. ***

Accept bribes

To counter bribery we brief all new direct employees on our anti-bribery and corruption policy at their induction and provide regular anti-bribery training to them during the course of their employment.

* Where we offer or accept modest gifts and hospitality that are proportionate and appropriate in value and nature, we ensure that these adhere to our gifts and corporate hospitality policy and are recorded on our gifts and corporate hospitality register.

Ethical Business Operations

Ganymede are a certified Ethical Employer and have passed the Achilles Ethical Employment Audit, achieving certification to the Ethical Business Programme which has provided us with a level of external validation that demonstrates we take social and regulatory compliance seriously and are committed to mitigating the risk of unethical business risks within our business and supply chain. We ensure that the integrity of our employees is maintained we are committed to the highest standards of ethics, health and safety, environmental, and operational performance whilst taking into consideration the impact on wider society.

Whilst we appreciate that everyone has commitments and interests outside of work, we want to ensure that these don't create any conflict between personal benefit and that of Ganymede. We will ensure that any actual or potential conflicts of interest are reported and dealt with appropriately.

Ganymede believe in fair competition and will ensure to compete both ethically and lawfully in all our activities.

Additional Resources

Whilst we do not expect our employees to know and understand detailed legal and regulatory requirements, we do expect our employees to ask questions if unsure, to ensure they are doing the right thing. We want our employees to Speak Up and raise any concerns you may have so that we can address them accordingly.

Ganymede have several other policies and procedures that underpin this Code of Ethics, and these can be found either on the [Company website](#), SharePoint or HR System.

If you have any further questions or queries you can contact our Compliance or HR Teams for support.