

# PROCO CODE OF ETHICS

## Compliance

ProCo ensures compliance with laws and regulations in the markets that we operate. The responsibility for compliance and risk management falls with the board of directors and day-to-day responsibility has been assigned to our Compliance & Quality Manager.

## Anti-bribery

We are committed to conducting our business fairly, honestly and transparently. We will not make offers or bribes, whether directly or indirectly, to gain business advantages. We will not accept bribes, whether directly or indirectly, to give business advantages.

ProCo assesses the risks of bribery and corruption through a risk management approach. We assess whether the countries in which we do business are at high risk of bribery, evaluate the sectors in which our company trades, review our contracts with business partners and check that the payment terms and commissions are clear and appropriate for the services given.

## Gifts & Hospitality

We may accept gifts of small items of limited value. We may not accept valuable items of more than £250. Although we may accept a gift now and then, we may not accept gifts which are given regularly and often.

Records are kept of all gifts given and received. Our business rule is that gifts we give must be of moderate value, legal under local law, and agreed by management. Valuable items received as gifts will be returned, or disposed of as agreed by management.

We may give and accept reasonable, hosted entertainment which is in the legitimate interests of our business. We will not give or accept lavish or frequent entertainment, or entertainment which is not hosted.

## Donations to organisations

ProCo may choose to make donations to charity. These are managed by Line Directors. No employee will make donations to a charity without approval of his or her Line Director. No donations will be made to charities, political parties or other organisations with the intention of gaining a business advantage.

## Fair Competition

ProCo believes in fair competition, we will conduct our operations in accordance with the principles of fair competition and all applicable regulations. We base our competition factors on price, quality and customer service.

## Whistle Blowing

Whistleblowing is the reporting of certain types of wrong doing that is disclosed in the interest of the public. Personal grievances (bullying, harassment, discrimination etc.) are not covered by whistleblowing and are reported through our normal grievance policy.

Examples of wrong doing under whistleblowing law could be the following:

- A criminal offence
- Risk or actual damage to the environment
- The company is breaking the law
- Someone's health and safety is in danger

ProCo has a procedure in place to enable employees to 'blow the whistle' without unfair treatment or discrimination. The procedure enables workers to report their concern anonymously or confidentially if

they wish and will make every effort to protect the identity of the worker concerned. ProCo has an escalation procedure in place for workers who are not happy with the outcome of their report.

## Privacy and Data Protection

ProCo is committed to best practice, and all activities are carried out in line with relevant UK and EU legislation. ProCo has a set of data protection principles that outline our commitment to respect privacy and take responsibility for data.

1. Data shall be processed **Lawfully, Fairly, and in a Transparent** manner:

**Lawful** – Personal data shall only be processed if there is a valid lawful basis

**Fair** – Data shall be within scope of subjects' consent (processing must match description)

**Transparent** – data subject must be told what processing will occur

2. **Purpose Limitation**

Data shall be collected for specified, explicit, legitimate purposes and not further processed in a manner incompatible with those purposes.

ProCo shall have clearly defined agreements with all customers stating exactly what the data will be used for. Data will never be used for anything other than the stated purpose.

Privacy notices, terms and conditions, and consent forms shall all provide the data subject with unambiguous information about the extent of processing involved.

3. **Data Minimisation**

Data shall be adequate, relevant & limited to what is necessary in relation to the purposes for which they are processed.

Data shall be held for no longer than is strictly required.

Minimisation should be taken into consideration in agreements with suppliers, controllers and processors.

4. **Accuracy**

Data shall be accurate and where necessary, kept up to date.

Every reasonable step shall be taken to ensure that inaccurate personal data, having regard to the purposes for which they are processed, are erased or rectified without delay.

5. **Storage Limitation**

Data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the data are processed.

Where data needs to be kept, it will be subject to pseudonymisation, or limited anonymisation.

6. **Integrity & Confidentiality**

Personal data shall be processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage using appropriate technical or organisational measures.

## Supply Chain Management

ProCo has established a system for evaluating the performance of our supply chain, including their status on quality & performance, labour standards, health and safety of workers, environment and business ethics. ProCo has set out terms and conditions of purchase for suppliers which outlines the way in which we will do business, this is issued whenever a new supplier relationship forms.

