



This policy sets out the standards we expect from our employees in their internal and external dealings with colleagues, customers, stakeholders and third parties, together with our temporary and sessional workers.

Expected Standard of Conduct

- We will conduct every aspect of our business with honesty, integrity and openness, respecting human rights and the interests of our employees, customers and third parties.
- We will respect the legitimate interests of third parties with whom we have dealings in the course of our business.
- We will maintain the highest standards of integrity - for example, we will not promise more than we can reasonably deliver or make commitments we cannot or do not intend to keep.

Employees

Aims

- Developing a workforce where there is mutual trust and respect, free from bullying and harassment, where every person feels responsible for the performance and reputation of our company.
- Respecting the rights of individuals their customs and traditions and their right to freedom of association and the right to decide whether or not to join a trade union. We will negotiate in good faith with properly elected representatives of our employees.
- Recruiting, employing and promoting employees on the basis of objective criteria and the qualifications and abilities needed for the job to be performed in line with our Equalities Policy.
- Maintaining good communications with employees through our information and consultation procedures.
- Providing our employees with suitable training and assisting them in realising their potential.
- Ensuring the privacy and confidentiality of our employees' personal information is respected.
- Suitably rewarding our employees for their contribution to the success of the business.
- Providing mechanisms whereby employees can raise legitimate concerns confidentially regarding malpractice and ensuring no one will be victimised for a report made in good faith, in line with our Whistle Blowing policy.
- Providing employees with the appropriate information and training to comply with this Code and the associated policies
- Seeking to protect our employees from third party abuse that might be injurious to their safety, health or well-being.

Integrity

- We aim to develop strong relationships with our suppliers, stakeholders and others with whom we have dealings, based on mutual trust, understanding and respect.
- In those dealings, we expect those with whom we do business to adhere to business principles consistent with our own.
- We will conduct our operations in accordance with the principles of fair competition and applicable regulations.
- No unrecorded account, fund or asset will be established or maintained.
- We will comply with the laws and regulations applicable wherever we do business. We will obtain legal advice where felt necessary to comply with this commitment.
- We will review and track our business risks including social and environmental risks.
- Nurture Fostering will not facilitate, support, tolerate or condone any form of money laundering.



- To ensure that our business is run in an ethical and effective manner we will maintain internal controls in line with Nurture Fostering procedures and practice guidance.

Personal Conduct

- All employees are expected to behave in accordance with the principles set out in this Code of Business Ethics.
- Employees are expected to protect and not misuse company assets such as buildings, vehicles, equipment, cash and procurement cards.
- Employees are expected to use e-mail, internet, IT and telephones in a manner appropriate for business purposes in line with the principles contained in this code and the staff handbook.

Bribery

- No Nurture Fostering employee, or individual or business working on our behalf must accept or give a bribe, facilitation payment or other improper payment for any reason.
- This applies to transactions with government officials, any private company or person anywhere in the world. It also applies whether the payment is made or received directly or through a third party.
- FirstGroup shall ensure that adequate procedures are in place to prevent the risk of bribery and that these are effectively communicated and implemented across the Group in line with the requirements of the Bribery Act 2010.

Gifts, Entertainment and Improper Payments

- Accepting or giving any entertainment or gift that is designed to, or may be seen to influence business decisions, is not acceptable. No Nurture Fostering employee shall offer, give, seek or receive, either directly or indirectly, inducements or other improper advantages for business or financial gain. If an employee is in any doubt as to whether he or she may accept an offer, that employee should discuss the issue with his or her manager.

Conflicts of Interest

- Whilst we respect the privacy of our employees, all Nurture Fostering employees are expected to avoid personal relations, activities and financial interests, which could conflict with their responsibilities to Nurture Fostering.
- Nurture Fostering employees and consultants must not seek gain for themselves or others through misuse of their positions or company property.
- All actual and potential conflicts (including those arising from the activities or interests of close relatives or partners) should be disclosed to and discussed with an employee's line manager.

Confidentiality

- Information received by anyone in the course of his or her employment must not be used for personal gain or for any purpose other than that for which it was given.
- Where confidential information is obtained in the course of business that confidentiality must be respected.

Health and Safety

- We are committed to creating and maintaining a safe and healthy working environment for our employees, customers and the community.



- Our commitment to ensuring the safety and security of our employees is set out in our Health and Safety policies.
- We strive to avoid emergency situations but recognise the need to be prepared. We are committed to having effective emergency response procedures in place.

The Environment

- FirstGroup is committed to making continuous improvement in the management of its environmental impact as set out in our Environmental and Energy Policy.
- All employees are expected to adhere to the requirements of the local environmental management system and support the improvement in our environmental performance.

Clients

- Nurture Fostering is committed to providing safe, value for money, high quality, consistent, accessible and reliable services to its customers.
- All employees are expected to behave respectfully and honestly in all their dealings with customers and the general public in accordance with the principles set out in this Code.
- In particular we will safeguard and protect the welfare of vulnerable people who come into contact with our employees. Employees will be made aware that they hold a position of trust and that they must at all times maintain the highest standards of personal conduct that reflects this trust being placed with them.

Shareholders

- Nurture Fostering will conduct its operations in accordance with the principles of good corporate governance.
- We will provide timely, regular and reliable information on the business to all our shareholders as requested.

Community Involvement

- Our operations touch members of the community daily, whether as customers, neighbours, employees, businesses or residents. We are committed to fostering good relationships with the communities in which we work and building community partnerships that deliver positive change.