

Code of Business Ethics

Our Code of Business Ethics and the associated policies (Equal Opportunities, Conduct & Appearance, Bullying, Discrimination & Harassment, Data Protection, Gifts and Hospitality and Whistle blowing) contain everything you need to know about doing the right thing at work.

The Company is fully committed to ethical behaviour of the highest standards throughout all aspects of our business, and this includes the relationship of all our employees with each other and with external parties such as customers and suppliers.

1. Conflict of Interest

Every employee has a responsibility to avoid putting themselves in a position where their role within the Company conflicts with a business relationship or interest they have outside of the Company.

Employees are expected at all times to abide by their contractual obligations in respect of Outside Interests and Confidentiality.

If you are at all unsure about their responsibilities in this respect, please consult your manager for clarification.

2. The Behaviour We Must Demonstrate

We are each responsible for displaying the highest levels of personal behaviour and conduct, some of which are detailed in our Conduct and Appearance Policy.

2.1 Respect and equal, fair treatment of colleagues and any other persons with whom you come into contact during the course of your employment is an essential part of how we do business.

No form of harassment, victimisation or bullying will be tolerated or condoned and all complaints of such behaviour will be properly investigated (See the Bullying & Harassment Policy). Any other form of victimisation or bullying will be acted upon, thoroughly investigated and the alleged bully may be subject to action under the Company's Disciplinary Procedure.

2.2 Honesty: You should be scrupulously honest and rigorous in everything you do at work. As we strive towards service excellence, we cannot afford to cut corners or ignore regulations.

If you behave in a dishonest way, the Company will take action against you. When on the other hand you behave with integrity, the Company will support you.

Each one of us must comply with all laws that are in force wherever the Company does business. The Company will never support or turn a blind eye to law-breaking by employees and will co-operate with the authorities in investigations.

2.3 Information Accuracy: Information is important to the Company's success. That means that each of us must contribute to maintaining accurate records, in line with the law (See Data Protection Policy) and the guidelines laid down by the Company. We must also ensure that all records are kept safe from physical loss or damage and from unauthorised access.

2.4 Money Matters: All accounts and records must be documented in a way that clearly identifies and describes the true nature of the business transactions. Accounting records and financial reports should comply with accounting standards, generally-accepted accounting practices and the Company's documented accounting policies and procedures. Personal expenses should comply with the Company's Business Expenses Policy.

We can all help to combat fraud and theft. If you think that controls are weak in your area, please advise your manager or your manager's manager. Ideally, every transaction where fraud could occur should have more than one person to authorise, implement and record it. Be aware of what the procedures are meant to be. That way, behaviour at odds with Company standards is much more noticeable.

2.5 Speaking Up: If you become aware that another employee or group of employees is behaving dishonestly or in contravention of any of the Business Ethics Policies it is important that you do not turn a blind eye, but act to alert the Company to your suspicions. To ensure that you feel supported in this process we have introduced the Whistle Blowing Policy (Public Interest Disclosure Policy) which explains the detailed confidential process for bringing your suspicions to our attention.

3. Core Values

To support our expectations of behaviour, the Company have 5 Core Values, which define us as a Company and how we want to work together, in addition to enabling a foundation for a higher performing culture.

3.1 Integrity – “Be clear and consistent in your actions”

How do we demonstrate this at Consort Medical?

- *We have open and transparent conversations and communications with each other*
- *We lead by example*
- *We demonstrate good judgement when handling confidential and sensitive matters*
- *We acknowledge success as well as failure learning from both*
- *We accept responsibility for our own decisions and mistakes, we aren't defensive when others give us feedback or when things go wrong, we do the right thing even when nobody is watching*

How do we know that people aren't demonstrating integrity at Consort Medical?

- *They disagree and undermine decision when they have been made*
- *They make decisions based on unprofessional or unethical influences*
- *They discuss sensitive or personal issues openly with others*
- *They talk about others behind their back*

3.2 Respect - “Treat people as you expect to be treated”

How do we demonstrate this at Consort Medical?

- *We are courteous and considerate of everyone where ever they work*
- *We acknowledge other people's views and consider the impact of what we say and do on others*
- *We listen carefully to what other people say and consider their perspective*
- *We challenge people who don't demonstrate respect for others*
- *We respect that everyone is different and the benefits these differences bring*
- *We aren't personal or confrontational in the way we interact with others*

How do we know when people aren't demonstrating respect at Consort Medical?

- *They talk down to others*
- *They don't take the feelings or views of others into account when making decisions or taking action*
- *They display their frustration with others*
- *They don't reply to emails*
- *They are always late for meetings*

3.3 Teamwork - “Work together to achieve a shared objective”

How do we demonstrate this at Consort Medical?

- *We offer support and guidance to each other*
- *We work inclusively embracing other people's difference be it disability, gender, ethnicity, nationality*
- *We work collaboratively with others, across departments and functions*
- *We support the team objectives and actions even if they aren't what we would choose*
- *We identify individual skills and allocate tasks to maximise team performance*
- *We share relevant information with our colleagues in a timely way so that effective decision can be made*

How do we know that people aren't demonstrating respect at Consort Medical?

- *They are more interested in achieving their own personal objectives than working with to achieve team objectives*
- *They take credit for team outputs rather than giving the wider team credit*
- *They take and make opportunities to push forward their own agenda rather and undermine the team*
- *They create, through their behaviour, divisions in the team*

3.4 Results Driven - “Maximise your performance through drive and determination”

How do we demonstrate this at Consort Medical?

- *We relentlessly strive to accomplish and exceed objectives*
- *We take pride in delivering consistent and high standards of work*
- *We exceed expectations wherever possible and it is appropriate to do so*
- *We seek to improve all aspects of work*
- *We own our own performance to make sure we are the best we can be*
- *We look for opportunities to be even better*

How do we know that people aren't demonstrating respect at Consort Medical?

- *They take unacceptable risks to achieve results*
- *They push to achieve our own results and don't consider the impact or affects this may have on others or our business*
- *They lose sight of what the priorities are*
- *They compromise quality and our brand*

3.5 Customer Focus - “Strive to exceed the expectations of your internal and external customers”**How do we demonstrate this at Consort Medical?**

- *We identify understand and give priority to meeting the needs of customers*
- *We treat every interaction with a customer as an opportunity to reinforce our strengths*
- *We actively keep in touch with and are aware of what is happening in the market place*
- *We exceed customer expectation and add value while balancing the impact on costs to our business*
- *We engage with our customers to make sure we delivery beyond their requirements*

How do we know when people aren’t demonstrating respect at Consort Medical?

- *They don't seek customer feedback*
- *They don't listen or act on customer feedback*
- *They don't put the customer first*
- *They don't recognise internal customers*