



ETHICS AND BUSINESS INTEGRITY POLICY

Policy Statement

DATS Holdings Ltd is committed to the practice of responsible corporate behaviour. Through its business practices the Company seeks to protect and promote the human rights and basic freedoms of all its employees and agents. Further the Company is committed to protecting the rights of all of those whose work contributes to the success of the Company, including those employees and agents of suppliers to the Company. This policy is non-exhaustive, and all aspects of the Company's business should be considered in the spirit of this policy.

Human Rights

- DATS Holdings Ltd is vehemently opposed to the use of slavery in all forms; cruel, inhuman or degrading punishments; and any attempt to control or reduce freedom of thought, conscience and religion.
- The Company will ensure that all of its employees, agents and contractors are entitled to their human rights as set out in the Universal Declaration of Human Rights.
- The Company will not enter into any business arrangement with any person, company or organisation which fails to uphold the human rights of its workers or who breach the human rights of those affected by the organisation's activities.

Workers' Rights

- DATS Holdings Ltd is committed to complying with all relevant employment legislation and regulations. The Company regards such regulations and legislation as the minimum rather than the recommended standard.
- No worker should be discriminated against on the basis of age, gender, race, sexual orientation, religion or beliefs, marital status or pregnancy. All workers should be treated equally. Workers with the same experience and qualifications should receive equal pay for equal work.
- No worker should be prevented from joining or forming a staff association or trade union, nor should any worker suffer any detriment as a result of joining, or failing to join, any such organisation.
- Workers should be aware of the terms and conditions of their employment or engagement from the outset. In particular workers must be made aware of the wage that they receive, when and how it is to be paid, the hours that they must work and any legal limit which exists for their protection and any overtime provisions. Workers should also be allowed such annual leave, sick leave, maternity / paternity leave and such other leave as is granted by legislation as a minimum.
- The Company does not accept any corporal punishment, harassment in any form, or bullying in any form.

Environmental Issues

- DATS Holdings Ltd is committed to keeping the environmental impact of its activities to a minimum and has established an Environmental Policy in order help achieve this aim. Copies of the Environmental Policy are available on request.
- As an absolute minimum, the Company will ensure that it meets all applicable environmental laws in whichever jurisdiction it may be operating.

Conflicts of Interest

- DATS Holdings Ltd holds as fundamental to its success the trust and confidence of those with whom it deals, including clients, suppliers and employees. Conflicts of interest potentially undermine the relationship of the Company with its partners. In order to help preserve and strengthen these relationships the Company has developed a Corporate Hospitality and Gifts Policy, which provide rules and guidelines concerning the conduct of its officers and employees aimed at minimising the possibility of conflicts of interest. Copies of the Corporate Hospitality and Gifts Policy are available on request.
- The company will operate in accordance with the policies, procedures and restrictions of its clients in relation to corporate hospitality, gifts and incentives at all times.
- All officers, employees and representatives of the Company are expected to act honestly and within the law.

Information and Confidentiality

Information received by employees, contractors or agents of DATS Holdings Ltd will not be used for any personal gain, nor will it be used for any purpose beyond that for which it was given. The Company will at all times ensure that it complies with all applicable requirements of data protection legislation in force from time to time.

Suppliers and Partners

- DATS Holdings Ltd expects all suppliers and partners to work towards and uphold similar ethical and moral standards.
- The Company will investigate the ethical record of potential new suppliers before entering into any agreement. Further, the Company reserve the right to request information from suppliers regarding the production and sources of goods supplied.
- The Company reserve the right to withdraw from any agreement or other arrangement with any supplier or partner who is found to have acted in contravention of the spirit or principles of this Ethical Policy.

Ethical Purchasing & Procurement

DATS Holdings Ltd is committed to procuring its works, goods and services in an ethically and environmentally sensitive way, yet with proper regard to its commercial obligations, ensuring that suppliers deliver to agreed timescales, quality and cost.

Purchasing is undertaken in a manner that encourages competition, and offers fair and objective evaluation of offers from all potential suppliers.

Purchase of goods and services with an annual value in excess of **£50,000** excluding VAT will be conducted according to the following principles:

- Completion of a business case to evidence the need to purchase.
- Procurement practices will be transparent, auditable and fair.
- Research will be conducted to ensure a clear understanding of the risks associated with the purchase of goods and services, and purchasing decisions will include contingency and risk mitigation strategies.
- Tendering is based on both quality and cost, is evaluated in a fair, objective, and structured manner that actively encourages competition.
- Small, local and BAME (Black, Asian & Ethnic Minority) organisations will be encouraged to participate in the procurement process.
- Company employees responsible for purchasing will not accept corporate gifts, or any type of solicitation that could be construed as enticement.
- The procurement process demonstrates that the approach taken to competition is rigorous, balanced and driven by service needs and market intelligence.
- Potential suppliers are ethical, sensitive to the environment and operate within EU and UK legislation.
- Suppliers are able to demonstrate their ability to deliver continuous improvement and cost savings throughout the life of the contract.
- Business transactions will, where possible be conducted electronically.

Review

This policy will be reviewed regularly and may be altered from time to time in light of legislative changes or other prevailing circumstances.

Signed:



Name:

Stephen Nickson

Designation:

Managing Director

Company Name:

DATS Holdings Ltd

Date:

15 August 2019