

# HR14 - Ethical Policy

## 1. Ethical Business Statement

At Infomentum, our commitment to ethical conduct is foundational to who we are and how we function. We believe that nurturing the highest standards of ethics is not just a responsibility but a cornerstone of our success. Acting ethically builds the trust essential to our relationships with clients, employees, suppliers, and the wider community. Each decision we make mirrors our values, and we acknowledge the wide-ranging effects our actions have on the legal, economic, and social landscapes.

We acknowledge that trust cannot be taken for granted. The bridge between Infomentum and its stakeholders is built on integrity, fairness, and transparency. This ethical policy serves as a guiding framework to uphold that trust. It reflects our unwavering dedication to maintaining the reputation we have built over time. By fostering an environment of professionalism and respect, we aim to strengthen the trust placed in us by those we serve and collaborate with.

This policy directs us in navigating the complexities of daily business operations. From small interactions to large-scale decisions, every choice we make has the potential to impact multiple stakeholders. We are committed to ensuring that our actions are not only legally compliant but also ethically sound. At Infomentum, “Making change work,” and this policy embodies our dedication to making that change with integrity, professionalism, and a commitment to ethical excellence.

## 2. Purpose

At Infomentum, our purpose is to act with integrity in every decision we make and in all our interactions with clients, employees, partners, and the wider community. Our ethical principles are the foundation of our business success, driving trust, transparency, and accountability. We recognize that acting ethically is more than just compliance; it is about being proactive in ensuring that our actions reflect our core values of fairness, respect, and responsibility. Through this ethical policy, we affirm our commitment to maintaining high moral standards that resonate throughout our organization and partnerships.

## 3. Commitment

We are dedicated to making sure that each and every Infomentum partner, supplier, and employee maintains these moral principles. Our operations depend on the trust we establish with our stakeholders, which is something we should never take for granted. The guiding values that help us uphold the greatest standards of integrity, trustworthiness, and professionalism in whatever we do are outlined in this policy. Beyond only following the law, we are committed to upholding a zero-tolerance policy against corruption, taking a firm stand for human rights, and working to create an inclusive and courteous work environment for all.

We are equally committed to combatting modern slavery and human trafficking. In accordance with the Modern Slavery Act 2015, we are dedicated to ensuring that our business and supply chains are free from any form of modern slavery. As an equal-opportunities employer, we promote a non-discriminatory and respectful working environment for all staff. We assess our supply chains for risk and work only with partners and suppliers who share our values of fairness and ethical business practices.

## 4. Strategy

Infomentum's strategy for implementing our ethical guidelines focuses on embedding ethical considerations into every aspect of our daily operations. Our processes ensure that:

**Employee Training & awareness:** Employees are trained and briefed on ethical standards during their induction and have access to resources such as the HR57 Employment Contract and HR25 Employee Handbook. The handbook highlights key policies, including our whistleblowing procedure, which encourages employees to report any wrongdoings and concerns related to inappropriate behaviour in the workplace. Employees are well informed about the whistleblowing policy during their training, making sure they understand the process towards reporting concerns in confidentiality and in good faith without fear of retaliation. While employees are trained to recognize and report unethical behaviours, the policy does not aim to promote indiscriminate reporting. Continuous training is provided for those working directly with clients, suppliers, and partners, to ensure a strong alignment between ethical principles and stakeholder expectations. This policy is communicated to all staff and staff are expected to follow this policy in all business dealings. Staff are also encouraged to identify areas where improvement may be made to our processes and procedures.

**Zero Tolerance for Dishonesty:** We enforce a zero-tolerance policy toward fraudulent, dishonest, or illegal activities. Any suspected fraud or irregularities will be thoroughly investigated, and appropriate disciplinary actions will be taken to uphold our commitment to integrity.

**Supplier Relationships:** We work to develop transparent and mutually beneficial relationships with our suppliers. We ensure that our suppliers understand and adhere to our ethical policy, and we prioritize working with those who share our values (IM50). A Preferred Supplier List (PSL) and preliminary assessments safeguard these relationships.

**Anti-Corruption and Bribery:** Infomentum adheres strictly to the Bribery Act 2010, with a zero-tolerance policy for any form of bribery or corruption. All staff are responsible for preventing, detecting, and reporting any unethical behaviour and are trained to avoid activities that might lead to such breaches. We will investigate all cases of suspected fraud, theft, and irregularity, and where appropriate we will prosecute or take disciplinary action. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for Infomentum or under our control. All individuals are required to avoid any activity that might lead to, or suggest, a breach of this policy.

**Tech ethics:** As a technology-driven company, Infomentum is committed to protecting personal data and ensuring that no employee, regardless of technical expertise, accesses it without proper authorization. We implement strict data privacy protocols to safeguard client and employee information, ensuring technology is used responsibly and ethically. Unauthorised access or misuse will lead to disciplinary action.

**Modern Slavery:** We conduct rigorous assessments of our business and supply chains to identify and mitigate any risks related to modern slavery. Infomentum does not engage with any organization that is involved in slavery, servitude, forced or compulsory labour. We take proactive measures to ensure all employees and partners adhere to the highest standards in respect to human rights. We will continue to evaluate our supply chain to ensure that it remains free from any form of modern slavery. Infomentum's recruitment and people management processes are designed to ensure that all prospective employees are

legally entitled to work in the UK and to safeguard employees from any abuse or coercion once in our employment. Infomentum does not enter into business with any organisation, in the United Kingdom or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

Our ethical duty is not limited to following rules; rather, it is a dynamic pledge to always act honourably, fairly, and respectfully. We are unwavering in our commitment to preserving these values as we negotiate upcoming possibilities and challenges. We are committed to creating an environment that values moral excellence and gives our partners and staff the freedom to make decisions that will benefit both our company and the communities we serve. With this dedication, Infomentum will keep fostering long-lasting trust and promoting significant, ethical change.

## 5. References

Along with this policy.

- › HR13 Equality & Diversity Policy
- › HR57 Employment Contract
- › HR25 Employee Handbook
  - › I. Anti Harassment & Bullying policy
  - › M. Whistleblowing policy
- › IM50 Supplier questionnaire
- › Confluence pages
  - › Partners

## 6. Contacts

If you have any comments regarding Infomentum Ltd commitment to its Ethical Policy please feel free to contact:

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