



MP LOCUMS HEALTHCARE LTD

ETHICAL POLICIES



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SECTION 1

Code of Practice

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MP Locums Code of Conduct

1. Introduction

1.1 Scope of Application

We believe that business should be conducted honestly, fairly and with respect for people, their dignity and their rights. This Code is intended to make clear what this means in terms of practical behaviour. It spells out the standards of behaviour by which we try to manage the organisation. We expect and require that all managers and employees of MP Locums apply the same standards in their dealings with other people and organisations.

This code is to be applied within MP Locums and to direct suppliers and sub contractors.

1.2 What are we in Business for?

We are in business to create shareholder value by maintaining and servicing products to the highest possible standard at all times.

To build long term sustainable shareholder value, we need to implement our vision to develop a category leading brand. We will do this honestly, fairly and with respect for people and the natural environment.

To continue to grow and prosper we will need, increasingly, to build partnerships with our customers and suppliers. Such partnerships must be based on mutual trust and we will earn our partners' trust by operating according to the principles laid out in this document.

1.3 Stakeholders



There are a number of categories of people and organisations who are affected by our actions and to whom we have responsibilities. These include our employees, our customers, our suppliers, other business partners and the wider community. These are, of course, in addition to the owners of the business, to whom we have the responsibility to protect their investment and to make sure that they receive an appropriate return.

1.4 Ethical Standards

MP Locums requires all its suppliers and partners to conduct their businesses in an ethical manner. All suppliers & partners must provide Safe, Legal goods or services that fulfill statutory requirements. No contract will be entered into with any supplier or partner engaged in bribery, kickbacks or the provision of gifts, favours or services to gain a competitive advantage with MP Locums or any third party.

1.5 Status of this Code

This Code has over-riding status in governing the standards of our business behaviour. All contracts entered into by MP Locums should be consistent with it. If there are any inconsistencies, MP Locums is required to act in accordance with this Code's standards rather than any lower standards set out in such contracts.

In running our business, MP Locums is required to observe the standards of conduct set out below.

2. Standards of Behaviour

2.1 Towards Employees

Our employees are our greatest asset. Our continued success depends entirely on harnessing their talents and enthusiasm.

2.1.1 We will:

- Respect the human rights of all employees (see the Employment Standards Policy document);
- Provide good, safe and healthy conditions in which to work (a separate and more detailed Health & Safety Policy has been issued);
- Provide competitive earnings and other employment benefits;
- Offer fair terms of employment through contracts of employment that even-handedly confer mutual benefits and responsibilities on employer and employee;
- Promote the development and best use of people's talents;
- Select, train and promote employees fairly, on merit, giving equal opportunities to all;
- Not discriminate among employees or potential employees on the grounds of race, colour, religion, nationality, ethnic origin, political opinion, sexual orientation, marital status, gender, age, disability or part time or fixed term status;
- Ensure a working environment that is free from harassment and bullying;
- Manage people with consideration and respect, providing feedback on their performance;
- Ensure that disciplinary procedures are documented, fair and open;
- Keep all employees informed about changes, trends and developments;



- Not ask any employee to do anything that is illegal or immoral or that fails to comply with the standards of any recognised professional body of which he or she is a member;
- Encourage employees to speak up about any instances of wrongdoing or breaches of this Code that they become aware of;
- Respect employees' rights to join whatever lawful representative organisations they wish or to choose not to join any such organisations;
- Ensure all legislation for sick leave, child care, emergency leave, pregnancy leave, holiday leave and statutory holidays and any similar issues are observed;
- Respect employees' rights to take part in civic activity (such as charitable work, acting as a school governor and standing for election to public office) and to practice their religions in accordance with their own beliefs, subject to their compliance with their contracts of employment; and
- Not seek to employ people on casual, fixed term, or other bases in order to avoid giving them employment protection, social security or other normal employee benefits.

2.2 Towards Customers

To continue to succeed, we need to win and retain customers by building partnerships with them.

2.2.1 We will:

- Supply products and services that offer consumers good value in terms of price, quality, performance, safety and environmental impact;
- Establish mutually beneficial business relationships and strive to meet or exceed the spirit as well as the letter of our contractual commitments;
- Seek clarity in all our agreements, trying to avoid any ambiguity about what we undertake to do and what we expect of our customers;
- Ensure that any quality or performance problems that occur in our products are dealt with expeditiously with the minimum



inconvenience to our customers and consumers; and

- Not seek to obtain sales or other business advantages by giving bribes or other dubious inducements. We will not make any payments to any employees of customers or government departments or agencies in order to obtain commercial advantage.

2.3 Towards Suppliers

An efficient and reliable supply chain is an increasingly key factor in business success. This requires close inter-dependent partnerships with our suppliers.

2.3.1 We will:

- Seek to develop mutually beneficial partnerships with suppliers;
- Comply with the spirit as well as the letter of contracts with suppliers, not taking advantage of unintended errors;
- Seek clarity in all our agreements, trying to avoid any ambiguity about what we undertake to do and what we expect our suppliers to do;
- Develop business with suppliers on the basis of their embracing and complying with our Code of Business Conduct, especially our Employment Standards, Health and Safety and Environmental policies;
- Agree clear payment terms with our suppliers and make sure we pay them on time in accordance with those terms, not avoiding payment on technical pretexts;
- Insist on honesty and integrity in all aspects of our business with suppliers and not tolerate any attempts to obtain business from us by payments or gifts to our employees or agents or members of their families; and
- Not establish business relationships with people or organisations that we have any reason to believe may be involved in unlawful or unethical business practices.



2.4 Towards the Wider Community

We believe that business organisations have an obligation to be good corporate citizens.

2.4.1 We will:

- Comply fully with the requirements of all laws and regulations of each country in which we operate;
- Try to minimise any adverse effects of our activities on the environment and the earth's natural resources (Please refer to MP Locums Environmental Policy);
- Support worthwhile relevant charity and community organisations and activities;
- Not make payments to political parties or take any part in party politics, although we reserve the right to raise matters that affect our legitimate business interests with governments and political organizations;
- Encourage our employees to become involved in community activities; and
- Support worthwhile relevant charity and community organisations and activities.

2.5 Other Matters

2.5.1 Competition

We believe in a free and fair market economy as the most appropriate environment for business. Therefore we will:

- Compete vigorously but fairly in the markets in which we operate;
- Not try to restrict competition by price fixing;
- Not seek to obtain confidential information about competitors by underhand means; and
- Respect other people's intellectual property rights.

2.5.2 Financial Matters

All transactions by MP Locums will be open and be fully documented and accurately reflected in the accounts of the company in accordance with established accounting procedures and will be subject to internal and external audit.

2.5.3 Confidentiality

We will take care to safeguard the confidentiality of information that we hold about employees and our business partners. Such information will only be made available to those by whom it is needed to undertake their work.

2.5.4 Understanding and Compliance

- We will develop and implement programmes to enable all present and future employees to be informed about and understand our standards of business conduct and the behaviour required of them; and
- We will require all our senior executives to report at least once a year on their compliance with our standards of business conduct and the steps they have taken to communicate these standards to all employees and monitor their application.



SECTION 2

EMPLOYMENT STANDARDS POLICY

Principle

The Company and its shareholders believe that business should be conducted honestly, fairly and with respect for people, their dignity and their rights.

Policy

3 Our Employees

It is our policy that the people who work for MP Locums, and their health, safety and rights at work, should be respected and protected. We strive to comply with all relevant employment laws and regulations in each country in which we operate. Beyond that, we follow our own Code of Business Conduct and we aspire to match the best employment practices.

Equality in Employment Standards

3.1 Age Equality

MP Locums guiding principles for promoting Age Diversity in the workforce are:

- We acknowledge that older and younger workers may face stereotypes about their capabilities and prospects;
- Age stereotypes diminish choice for individuals and lead to ineffective use of people in the organization;
- Age does not equate to physical or mental ability and is a poor predictor of performance;
- MP Locums rejects the use of age as a deciding factor in employment decision making; and



- Any different treatment must be openly justifiable on other objective criteria.

MP Locums will apply these principles to all employment policies, practices and decisions applied to employees. This includes recruitment, selection, training, promotion, reward, retirement, redundancy, transfer and career development.

3.2 Equality For LGBT People

MP Locums will ensure that in carrying out its duties lesbian, gay, bisexual and trans people are given equal and unprejudiced treatment. To achieve this objective the MP Locums will:

- ensure that policies, procedures and practices are not based on the assumption that everyone is, or should be, heterosexual;
- acknowledge same sex relationships and ensure that, wherever possible, partners have equal access to the services and benefits available to heterosexual couples;
- encourage the participation of lesbian, gay, bisexual and trans people in the decisions that affect their lives;
- confront unlawful discrimination and tackle prejudice through learning and development;
- encourage a culture of openness about sexual orientation and ensure that lesbian, gay, bisexual and trans employees have a safe and supportive environment in which to work;
- ensure service users are aware that they do not have the right to refuse service from lesbian, gay, bisexual and trans staff;
- ensure that recruitment and selection is carried out in accordance with organisational standards and best practice;
- provide appropriate development opportunities to assist with the implementation of this Policy and ensure that staff are aware of their individual responsibilities and the organisation's commitment;
- handle sensitively allegations of discrimination and harassment manage staff fairly and appropriately, ensuring there is no providing appropriate support to the alleged victim(s) in accordance with organisational policy and procedure;
- manage staff fairly and appropriately, ensuring there is no



discrimination in terms of attitude, work allocations, promotion or other conditions of employment; and

- Provide information and guidance to managers and staff on gender reassignment as well as on general appropriate language and behaviour issues that may affect people who are lesbian, gay, bisexual or trans.

3.3 Equality for People with Disabilities

MP Locums will ensure that in carrying out all of its duties people with are free from prejudice and discrimination in their everyday lives. To achieve this objective MP Locums has adopted the following principles:

- All policies, procedures and practices will be reviewed to ensure they comply with the Disability Discrimination Act 1995;
- Information will be available on request through a range of media and in a range of formats (including the provision of materials in symbols, large print, Braille, British Sign Language video or audio description) and alternatives to verbal communication will be offered so that people with disabilities enjoy equal access to information and services;
- Handle sensitively allegations of discrimination and harassment providing appropriate support to the alleged victim(s) in accordance with organisational policy and procedure;
- Access to independent advocacy, self advocacy, legal and advice services for people with disabilities will be improved to enable them to take control over their own lives;
- Recruitment and selection will be carried out in accordance with organisational standards and best practice. Reasonable adjustments will be made so that applicants with disabilities and existing employees who are or become disabled are treated fairly and with proper consideration of their abilities;
- All reasonable efforts will be made to help employees who are or become disabled remain in MP Locums employment;
- Employees will receive appropriate training in disability awareness and equality and will be made aware of their responsibility for the implementation and monitoring of this Policy.

3.4 Sex Equality

MP Locums will ensure that in carrying out its duties, women and men are protected from unlawful discrimination and treated equally. To help achieve this objective MP Locums will:

- encourage women and men to participate equally in the decisions which affect their lives;
- work in partnership to create safer environments for women and men;
- value life skills developed in the home and the community;
- support employees in making personal choices about their parenting, caring and work roles;
- make childcare services available to employees and elected members ensuring equality of access regardless of work location;
- support and enable flexible working to help employees who wish to do so balance their lives inside and outside work;
- improve development and progression opportunities for part-time workers;
- ensure that female and male employees are paid the same for doing equal work and have the same service conditions apply;
- ensure that employees are able to work in an environment that values them as individuals and is free from sexual harassment
- address the under-representation of women in senior management positions by improving the working environment and investing in women's development;
- confront unlawful discrimination and promote sex equality through learning and development;
- handle sensitively allegations of sexual discrimination and harassment providing appropriate support to the alleged victim(s) in accordance with organisational policy and procedure;
- ensure that recruitment and selection is carried out in accordance with organisational standards and best practice;

- manage staff fairly and appropriately, ensuring there is no discrimination in terms of attitude, work allocations, promotion or other conditions of employment; and
- provide appropriate development opportunities to assist with the implementation of this Policy and ensure that staff are aware of their individual responsibilities and the organisation's commitment.

3.5 Racial Equality

MP Locums will ensure that all its dealings, as employer or service provider, are free from racial discrimination. MP Locums will accordingly afford equal access to employment and services and will not discriminate on the grounds of race, colour, nationality, ethnic origin, cultural background or religion. In order to achieve this objective, MP Locums will ensure that it is working towards the following principles:

- Service users are made clearly aware that they do not have the right to refuse service from particular members of staff on racial grounds;
- Recruitment and selection is carried out with reference the Commission for Racial Equality Code of Practice and general best practice;
- Employees are given appropriate training in anti-racist practices and are made aware of their responsibility for the implementation of this Policy;
- Service users, employees, consultants, contractors, suppliers, and partners are able to go about their daily business free from racial harassment and discrimination;
- Allegations of racial discrimination and harassment are handled with sensitivity, giving appropriate support to the alleged victim(s);
- Staff are managed fairly and appropriately, ensuring there is no discrimination on racial grounds in terms of work allocations, consultation and communication, development and training opportunities, staff appraisals, granting of leave, or grievance and disciplinary matters; and



- Cultural and religious festivals and holidays are acknowledged and recognised so that leave is not unreasonably withheld from staff who may wish to celebrate them.

3.6 Racial Equality in Recruitment and Selection

Recommended Best Practice

In order to achieve Racial Equality in Recruitment and Selection MP Locums will ensure that it is working towards the following principles:

- Job Descriptions and Person Specifications are non-discriminatory. This will include ensuring that qualification and experience requirements are appropriate to the job concerned and that appropriate weight is given to qualifications earned outside the UK;
- All jobs are normally advertised externally and that advertisements acknowledge that black and minority ethnic groups are underrepresented in the workforce and encourage applications from this section of society;
- Proper consideration is given to advertising/promoting opportunities in the black and minority ethnic media;
- Any selection tests used are validated to ensure they are free from cultural or racial bias;
- There is regular monitoring of the ethnicity (using the most recent Census classifications) of applicants, short listed candidates and appointments; and
- Such monitoring statistics are used as the basis for targeted actions to address under-representation of black and minority ethnic people in the Council's employment at all grades.

3.7 Policy on Equal Opportunities in Employment

3.7.1 Principles and Commitment



MP Locums acknowledges that the experience of discrimination is a reality for people and because of race, gender, age, disability, sexual orientation and other issues, people are denied life opportunities, find access to services more difficult, and suffer inequalities as a result.

MP Locums is committed to securing genuine equality of opportunity in all aspects of its work, including in its role as an employer. MP Locums will not discriminate either directly or indirectly on the grounds of a person's race, colour, ethnic origin, nationality, sex, sexuality, religion, marital status, disability or age.

MP Locums commitment to equal treatment in employment applies at all stages of employment and prospective employment including recruitment, selection, learning and training, working relationships, career development, redundancy and retirement. No aspects of employment are excluded. MP Locums is committed to treat part-time staff as equitably as full-time staff.

Members, managers, and employees need to make sure that the commitments within this Policy are translated into action. Breaches of this Policy will be treated seriously and may lead to disciplinary action, in accordance with agreed procedures. The Directors have overall responsibility to ensure this Policy is consistently applied.

3.7.2 Individual Concerns

If any employee considers that she or he is the subject of, or witnesses unequal treatment, a complaint may be made through the agreed procedures for dealing with Grievances, or the MP Locums policy for Whistle blowing.

Suspected cases of direct or indirect discrimination will be investigated. Disciplinary action may then be taken against the individual(s) concerned.

3.7.3 Responsibilities in Delivering this Policy

- The Management and MP Locums Directors are responsible for providing leadership and ensuring change within the company;



- Managers are responsible for delivering equality in their area, providing support for staff to work together to achieve quality and to act on any staff or community complaint;
- All employees are responsible for ensuring that they work together to recognise and remove barriers to equality and justice, and behave in accordance with this Policy;
- HR Partners Matheson Horan are responsible for advising and supporting all employees and managers in applying the Policy to operational and policy matters affecting the employment of MP Locums staff.

SECTION 3

ENVIRONMENTAL POLICY

Introduction

MP Locums considers environmental issues to be an influential factor in our drive for world class standards and sustainable development.

We recognise that our business activities affect the natural environment in a number of ways. We aim, through continuing improvement, to minimise the adverse effects on the environment and the earth's natural resources, whilst safeguarding the health and safety of our employees and the public.

We will strive to:

- Comply with or exceed relevant legislative requirements. Where these are inadequate, we will set our own standards that comply with our environmental and ethical criteria;
- Develop and implement a set of procedures to monitor, control, and review our significant environmental impacts (an Environmental Management System or EMS) and update it as necessary;
- Provide safe working conditions for our employees, encouraging them to identify possible improvements and providing training wherever necessary;



- Reduce progressively the environmental impact caused by our products and activities;
- Communicate our policy and achievements widely and, where appropriate, freely share and disseminate the techniques used to improve environmental performance;
- Make efforts to inform the end users of our products how to use and dispose of them and their packaging responsibly; and
- Protect local and wider communities from environmental damage or nuisance resulting from our activities, offering support to community ventures in the localities in which we operate.