



# Tern PLC – Our Business Code of Conduct



Our Business Code of Conduct is our guide which explains how we do business ethically and responsibly. It reflects how our Directors, employees and any contractors or third party suppliers should act on a day-to-day basis, reflecting our daily operations and company values.

We are fully committed to compliant, transparent, fair and ethical business practice, and we have clear and documented policies and procedures in place to ensure our Directors, employees and any contractors or third party suppliers who are involved in work for Tern PLC, meet the following standards and requirements:

**Data protection:** We comply with all applicable laws and regulations regarding the processing of Personal Data and privacy in the UK, including the Data Protection Act 2018, General Data Protection Regulation (EU) 2016/679 (GDPR), the Privacy and Electronic Communications (EC Directive) Regulations 2003.

**Confidentiality:** We keep all information and material strictly confidential and would never use or disclose information belonging to us, our past, existing or future clients, our people or any third parties or suppliers without appropriate prior consent.



**Information security:** We have robust policies they have in place to manage the data we hold. Information is encrypted and stored in the UK, or outside the UK only where 'appropriate safeguards' (as defined by applicable data protection legislation in the UK) are in place. Any personnel with access to information have committed themselves to confidentiality (e.g. through the terms of their employment or supplier contract) or are operating under an appropriate statutory obligation of confidentiality.

**Business continuity:** We have documented and tested plans in place to respond to, mitigate and recover from disruption to normal business activity (eg natural disasters, software viruses, terrorism, illness) and to protect employees, systems and data.

**Gifts, favours and hospitality:** we will not solicit, nor provide, any gift and favours (including hospitality) to achieve preferred or approved status in any form of business dealing or procurement process. Under no circumstances will we give gifts, favours or hospitality that compromises, or could be perceived to compromise, personal judgement, objectivity, independence and integrity of the firm, or constitute a bribe.

**Anti-Bribery and corruption:** We do not tolerate any forms of bribery, facilitation payments or corruption, either by our people or those associated with us, including third Parties. We also do not allow political contributions of any kind in connection with work undertaken on our behalf.

**Conflict of interest:** Directors, employees and any contractors or third party suppliers who are involved in work for Tern PLC are contractually obliged and expected to avoid conflicts of interest and report any potential or apparent conflicts between their personal interests and the interests of the Tern PLC.

**Money laundering and fraud:** Directors, employees and any contractors or third party suppliers who are involved in work for Tern PLC are prohibited from engaging in any activity that would involve the firm facilitating money laundering or terrorist financing, or from contributing funds to illegal activities (such as terrorism), or any conduct that defrauds others, including the firm.

**Insider trading/dealing:** Directors, employees and any contractors or third party suppliers who are involved in work for Tern PLC must not engage in insider trading or dealing. Inside information is price sensitive information about an entity that is not public. Tern directors are subject to Tern's share dealing code. Access to price sensitive information is tightly controlled.

**Tax evasion:** UK or foreign tax evasion, and its facilitation, are serious criminal offences and no one involved in or supporting our business should do anything on our behalf that criminally facilitates tax evasion or facilitation.

**Labour and human rights:** We uphold the highest standards of human rights and work against exploitation in the workplace. This means complying with all laws and regulations to abolish child labour, eliminate all forms of forced and compulsory labour, and ensure slavery and human trafficking are not taking place, and comply with the requirements of the Modern Slavery Act 2015.

**Working hours, wages and benefits:** We fully comply with and seek to enhance and develop on national laws and regulations relating to working hours, wages, benefits (such as public holidays, paid annual leave, sick pay), deductions, rest periods, leave and overtime, to create a positive, fulfilling and productive work environment.

**Diversity and equality:** We treat people with respect and dignity and ensure that employees are not subject to any form of abusive conduct in the workplace. We provide equal opportunity and treatment, employ people from a diverse talent pool based on qualifications, skills and experience, and we do not tolerate harassment, discrimination, retaliation, and bias on the basis of race, ethnicity, religion, gender, gender identity or expression, sex characteristics, sexual orientation, disability, age and/or any characteristic protected by law and support equal pay for work of equal value.

**Health, safety and hygiene:** We comply with all applicable local laws, directives and regulations relating to health and safety in the workplace. This includes providing suitable training to prevent accidents and work-related illnesses.

**Protecting the environment:** We care for and protect the environment by complying with all applicable environmental laws and regulations, seek to proactively mitigate environmental risks and monitor, review and make continuous improvements, aiming to reduce our environmental footprint by minimising the use of energy, water and raw materials, supporting recycling and minimising emissions and waste and disposing of waste safely and responsibly.

**Supply chain management:** We are committed to be a responsible and sustainable business, seek to make a positive contribution to society and to manage and minimise any negative ethical, social and environmental impacts of our supply chain.

Tern PLC are fully committed to ensuring our Directors, employees, and any contractors or third party suppliers undertake their roles within our Business Code of Conduct. If you have any questions about our Code of Conduct please contact us via [info@ternplc.com](mailto:info@ternplc.com).