

## Code of Conduct

**This Code of Conduct details the policies which govern Rawstone Consulting's operations.**

Rawstone Consulting are an ESG and sustainability consultancy specialising in helping medium and large companies with reporting, strategy development and implementation.

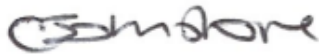
We live by the practices we preach, and are committed to understanding, managing and mitigating any negative sustainability impacts. Further, we support the Ten Principles of the UN Global Compact and take action to positively contribute to the UN Sustainable Development Goals. We deliver our commitment by:

- **Business ethics:** We conduct all business with honesty, integrity and comply with all relevant legislation. Anti-competitive practices including market-sharing, price-fixing, non-respect of confidentiality agreements, industrial espionage and abuse of dominant position are prohibited.
- **Community:** We strive to positively contribute to our local community. A minimum of 1% of turnover is donated to charitable causes each year and pro bono work is also conducted.
- **Corruption:** We prohibit corruption in all its forms, including bribery, extortion, fraud, embezzlement, money laundering and facilitation payments. Gifts and hospitality are not accepted if they are in any way thought or perceived to be in return for either doing/not doing something or showing favour/disfavour to a person or organisation.
- **Information security and data privacy:** We recognise the importance of protecting personal information and are committed to processing it responsibly and in compliance with applicable data protection laws, including UK GDPR obligations. External disclosure of confidential information is prohibited.
- **Inclusion and discrimination:** We respect and champion individual differences, providing equal opportunities in relation to all aspects of employment and work conditions. Direct discrimination, indirect discrimination, harassment, and victimisation in relation to age; colour; COVID-19; disability (mental or physical); ethnicity; gender reassignment; marriage or civil partnership status; nationality; political opinion; pregnancy and maternity; race; religion or belief; sex; sexual orientation; and worker representative organisations are all prohibited.
- **Environment:** We minimise our environmental impacts, notably those associated with waste and energy use, by avoiding waste and recycling wherever possible; conducting meetings by video/tele conference; using low carbon vehicles or public transport where travel is necessary; and sourcing our electricity from renewable sources. We are an operationally carbon neutral business, and our long-term goal is to be net zero by 2040. This is supported by an interim emission reduction target that has been verified by the Science Based Target Initiative.
- **Health and safety:** We are committed to effectively managing all aspects of health and safety in our workplace, and positively contributing to employee wellbeing.
- **Human Rights:** We respect human rights and operate in accordance with the fundamental rights set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work. This includes upholding freedom of association and collective bargaining, not using forced or child labour, and eliminating discrimination.

- **Supply chain:** We are committed to paying our suppliers on time and promptly. Our standard supplier payment terms are 30 days.
- **Lobbying:** We do not give political donations and we prohibit lobbying in contradiction of the standards upheld in this policy.
- **Tax:** We comply with the letter and spirit of all tax laws applicable to the company. We are committed to paying our taxes, not engaging in tax avoidance and being transparent in our relationship with the HMRC. As a company headquartered and solely operating in the UK we pay all relevant UK taxes.

This Code of Conduct applies to all employees of Rawstone Consulting, and to all individuals conducting client work on the behalf of Rawstone Consulting. Training on the Code of Conduct is available as needed, with annual mandatory training on GDPR, cyber security and anti-bribery also conducted.

Signed:



Caroline Johnstone, Managing Director

11/3/2024