

A group of people, including a child, are lying on a dark blue patterned rug, laughing and playing. The child is holding a red toy. The scene is captured from a high angle, looking down. A large, semi-transparent purple shape is overlaid on the right side of the image, containing the text.

headlam

WORKING THE HEADLAM WAY

Our code of ethics

OUR CODE OF ETHICS

At Headlam we believe in always doing the right thing. It's how we work the Headlam Way.

Of course, most of the time we all know instinctively what's right and what's wrong. Our general rule is, if something doesn't feel right, don't do it. And if you spot something that doesn't look or feel right by someone around you, please speak up about it.

This Code of Ethics:

- Explains how we should all put this way of working into practice
- Reminds us all how and when to raise concerns, either to our line managers, the HR Team or through our Speak Up service
- Helps us make the right choices

Please take the time to read through our Code of Ethics. This Code helps us all to make the right choices, obey the law, act with integrity and support each other respectfully. And please do ask your line manager if you have any questions.



Chris Payne
Chief Executive

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INTRODUCING THE CODE

We are the leading, most trusted experts in flooring and have ambitions to continue to grow. Central to this is doing business the right way. To help us, we have developed this Code of Ethics. This is a set of guidelines that builds on our company values and sets clear expectations for everyone at Headlam, and for those who work with us.

Why do we need a Code of Ethics?

Our Code helps us make the right choices. It helps ensure we always do the right thing to protect each other, our business, our reputation and, ultimately, our future. It cannot cover every situation, but rather it gives guidance. Colleagues can find more details on many of the topics covered by the Code in our policies and procedures, or you can speak with a member of the HR team.

Who is the Code for?

The Code applies to all colleagues at Headlam, from the warehouse to the board room, and covers our trading companies and subsidiaries in the UK and abroad. We expect third parties such as suppliers and agents, as well as partners such as contractors and consultants, to act in a way that is consistent with the principles of our Code.

What does it mean for me?

Doing the right thing is part of our Headlam Way values – the guidance in the Code supports us all achieve this. Following the Code means making the right choices, obeying the law, acting with

integrity and showing respect for each other. We're all responsible for behaving ethically and upholding the company's reputation. That's why it's important we're all familiar with the Code and use it every day. When we see something that isn't right or not clear, we cannot stand by – each of us has a responsibility to ask questions, speak to our line manager or raise a concern via the Speak Up service.

What part do managers play?

Behaving ethically starts at the top. Headlam's leaders, line managers and supervisors must:

- Set a positive example
- Promote the Code to their teams
- Create an open culture that encourages people to speak up
- Protect those who raise concerns

What happens if we don't comply with the Code?

Behaving in an ethical way protects our company, colleagues and partners. It will also avoid costly fines and negative damage to relationships and long term reputational damage.

IF IN DOUBT – SPEAK UP!

Everyone has a responsibility to raise concerns about breaches, or potential breaches of our Code. Colleagues that do will be supported by our Speak Up service.

Reporting concerns is everyone's responsibility and can be done in a number of different ways:

You can talk to your line manager

You can talk to your line manager or a member of the HR team at askhr@headlam.com

You can raise a concern

You can raise a concern, confidentially and anonymously, through the external Speak Up service, either via their website or phone.

Website

headlam.ethicspoint.com

Telephone

- UK and Northern Ireland
0800 046 5406
- France
0800 736 961
- Netherlands
0800 022 8815

The Speak Up service is managed through EthicsPoint, a compliance reporting tool that is operated by NAVEX, an external company specialising in compliance and risk management solutions.

You can also connect

You can also connect with a member of the Speak Up committee via speakup@headlam.com

The Speak Up committee is responsible for reviewing and investigating concerns that are raised via the Speak Up policy at Headlam.

WHAT WE ALL MUST DO



Work the Headlam Way through displaying our values



Keep each other
safe and well



Lead by example,
we are all leaders



Work together,
with everyone



Keep improving,
everywhere



Act sustainably, use less,
waste less, give back



Get it done,
brilliantly

And always, do the right thing!

What we all must do

- **Work** in an ethical manner and take pride in our decisions, behaviour and actions
- **Follow** our Code of Ethics. It's how we do things at Headlam, and includes legal, professional and regulatory obligations
- **Complete** all mandatory training in the timescales set
- **Support** our commitments to health, safety, welfare, security, the environment and our communities
- **Recognise** our Code of Ethics does not cover everything. Use your judgment to make ethical decisions
- **Demonstrate** our shared Headlam Way values. They underpin how we should work together, with health and safety being the top focus for everyone
- **Ask** for help if you are unsure
- **Speak up** if something does not feel right, or if you are not sure how to apply our Code of Ethics

OUR PEOPLE



Keep each other
safe and well



Keep each other
safe and well

HEALTH AND SAFETY

Keep each other safe and well, every day. We must never, under any circumstances, compromise on this shared value. Our approach to health and safety is built on the idea of shared responsibility. We all have a part to play in keeping each other safe and well.

Guidance

Health and safety means more than just following procedures, it means having a mindset that keeps us aware of, and allows us to eliminate or control, the risks we face every day. We're committed to ensuring, as far as reasonably practicable, a safe and healthy working environment for all colleagues, customers, contractors and visitors who visit or use our premises or who may be affected by our activities, products or services.

All our colleagues should:

- Act with due regard for the health and safety of themselves and people around them
- Follow company instructions and procedures, and make use of the safety equipment provided
- Only use equipment in accordance with the information, instruction and training provided by the company
- Report any danger to health or safety of individuals, defective structures or equipment

Importantly, every one of us has both the authority and the responsibility to stop any activity we believe is unsafe, and to report all concerns, incidents, and near misses. If in doubt, please speak up.

We try to support colleagues with their wellbeing. We have trained Mental Health First Aiders in place across our sites and our Employee Assistance Programme Lifeworks available to everyone. More details can be found in our Health & Safety policy and the wellbeing pages on our intranet.

Ethics in action

Q I noticed a defect which would make the equipment I am using potentially unsafe. If I raise my concern, it could affect our work schedule. What should I do?

A Do not use the equipment, inform your manager immediately. Make sure no one uses the equipment until it has been assessed and repaired. No deadline is worth the risk of using potentially unsafe equipment.

Q I was visiting another company's site and felt unsafe. I didn't like to say anything at the time, but should I have done?

A Your safety is essential wherever you are and Headlam will always support you if you walk away from an unsafe situation. We encourage you to raise the issue with the company concerned. If you don't feel you can do that, then speak to your manager, Regional Health and Safety Adviser or our National Health and Safety Manager.

OUR WORKPLACE

We're committed to fostering a work environment characterised by trust, honesty, fair treatment and respect for each other.

Guidance

We strive to create an inclusive culture where everyone can bring their authentic self to work and feel valued. We want to create a workforce that reflects the local communities we serve.

We expect everyone who works for, or with Headlam to commit to these principles:

- We treat all colleagues and partners with respect and we do not tolerate harassment or bullying of any kind
- We embrace inclusive practices so that everyone at feels included and welcomed at work
- We do not discriminate on the basis of age, gender, marital status, pregnancy, disability, race (including colour, nationality, ethnic or national origin), religion, sex or sexual orientation
- We offer pay and benefits at least equal to the relevant legal minimum of the countries in which we work, and make sure that our working hours reflect national and local regulations
- We respect colleagues' rights of freedom of association, for example being members of a union, and do not discriminate against those exercising their rights of association

- We do not use child or forced labour, and are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of its business

If we find any breaches of these principles, we will take action.

For more details, please see the Equal Opportunities Policy and Inclusion and Respect at Work Policy on our intranet, and the Modern Slavery Statement and Human Trafficking Statement on our website.

Ethics in action

Q A colleague is clearly upset by others telling jokes of a sexual nature. They don't bother me, but should I say something anyway?

A Telling joke of a sexual nature at work is inappropriate behaviour. It can cause both male and female colleagues to feel harassed, uncomfortable or threatened. Encourage your colleague to speak up, or talk to your line manager or HR.

Q My line manager is very hostile. My colleagues and I all feel bullied, but aren't sure what to do.

A You should speak up. We do not tolerate bullying and expect all managers to treat colleagues with respect. If necessary, speak directly to HR or consult the Speak Up service.

DRUGS AND ALCOHOL

To perform at our best every day, we report to work free from any substance including alcohol or drugs, that could prevent us from doing our jobs properly or that could create a dangerous situation.

Guidance

We expect all colleagues to follow the following guidance:

- Do not use drugs, alcohol, or solvents during working hours, except for the specific exceptions regarding alcohol as set out in our Drugs and Alcohol Policy, or when prescribed by a medical professional
- The use or presence of drugs or alcohol within a colleague's body will not be tolerated, even in instances where those drugs have been ingested outside of work
- Do not handle, sell, buy or store drugs or alcohol in the workplace, except for medically approved drugs which may be stored as appropriate
- Declare the use of any prescribed treatments, or over-the-counter medication that might affect your capacity to safely and effectively undertake your duties
- Speak up and report colleagues we think might be under the influence of drugs or alcohol

We try to support anyone who you suspect might have a drug or alcohol problem, and encourage people to use our Lifeworks Employee Assistance Programme, which is available to all employees.

Please consult our Drugs and Alcohol Policy for more details.

Ethics in action

Q I am taking medicine that may cause drowsiness. How should I handle this?

A Do not start any work activity before discussing this with your line manager who may need to contact Occupational Health or the HR team for advice.

Q Am I allowed to celebrate the end of the week by having a few alcoholic drinks with colleagues in the office?

A We allow consumption of alcohol on Company premises only in exceptional circumstances, for example a Christmas party or retirement celebration, and only after Site General Manager approval. After consuming alcohol you should not go back to work.

CONFLICTS OF INTEREST

A conflict of interest can occur when the actions or business interests of a colleague, family member or close friend, somehow clashes with the business interests of Headlam.

Guidance

Where competing interests conflict, we may find it difficult to make objective or unbiased decisions. The result can cast doubt on our decision-making or even call into question our personal and professional integrity.

Avoiding a conflict of interest is simple:

- If you suspect a situation may lead to a conflict of interest, speak to a member of the HR team
- Get everything out in the open, so you remove any suspicion of misconduct. Remember, even the appearance of a conflict of interest may make others think we are acting improperly
- Having disclosed a potential conflict, you will need to excuse yourself from any decisions until the conflict has been resolved. In some cases, you may need to withdraw completely from the situation

When family members or close friends are employed by a Headlam supplier or competitor, or when supplier's or competitor's family members or close friends are employed by Headlam, we may have to (re)issue specific terms or conditions in order to protect the interests of all parties involved.

Ethics in action

Q My site is looking for a new supplier. My cousin owns a business that provides exactly what we need. Can I recommend my cousin's business?

A You can recommend your cousin's business, but it is essential that you disclose the relationship to HR. If you personally are responsible for finding this new supplier, after raising the issue you should remove yourself from the decision-making process.

Q My husband works for a competitor. We don't discuss work at home, and I don't feel that Headlam has any right to know about my husband's career. However, some of my colleagues have said that I'm in a compromising situation. What should I do?

A In order to protect both yourself and Headlam, you should disclose all the facts to a member of the HR team. Also, you and your husband should make sure that confidential information belonging to either company is properly protected at home.

COMMUNITY INVOLVEMENT

We are committed to having a positive impact in the communities we work in and support people, places and causes that matter to our colleagues.

Guidance

Headlam is committed to investing in our communities and playing a positive role in society, and we encourage our people to become actively involved in their local communities. We have a programme called MyHeadlam Community, which sets a consistent approach for how each Headlam business donates time, money or services locally.

Whether you take part in activities directly part of this programme or outside of it, it is important to:

- Ensure that your community activities do not interfere with the performance of your job, or create a conflict of interest
- Ensure that any company charitable contributions comply with relevant laws and are in line with our Headlam's policy on corporate giving
- Seek approval before donating company funds or making contributions in Headlam's name

Ethics in action

Q A charity I support is asking local businesses for help. Is this something I can ask my team or Headlam to support?

A You should consult our My Headlam Community Policy which outlines our approach to community involvement and charitable support (donations and services), and the approval process.

Q I regularly volunteer at a local housing charity which provides previously homeless people with household essentials including furniture and flooring. Can I tell them that my service is being provided on behalf of Headlam?

A We are proud of the contribution our colleagues make to their local communities and encourage their involvement in initiatives to help improve people's lives. However, you must seek permission before presenting yourself as a company representative. Please speak to the HR team for advice and support.

OUR BUSINESS



Act sustainably, use less,
waste less, give back

ENVIRONMENTAL SUSTAINABILITY



Act sustainably, use less,
waste less, give back

Headlam is committed to reducing its direct and indirect impact on the environment. By seeking solutions that encourage long-term sustainability, we strive to leave a smaller footprint.

Guidance

We expect all colleagues to actively support good energy behaviours, recycling programs, waste avoidance strategies, and other strategies the company may put in place to reduce its impact on the environment.

For the company as a whole, we are focused on:

- Reducing our contribution to greenhouse gas emissions and climate change
- Becoming a more sustainable business
- Helping to increase the sustainability of our industry as a whole
- Continual improvement across all aspects of our environmental management

In order to achieve environmental sustainability, we need to:

- Constantly evaluate the performance and environmental impact of our buildings and our commercial and non-commercial fleet
- Set goals to improve energy efficiency and lower greenhouse gas emissions

- Work closely with our suppliers on collective emission reductions, improving the availability of sustainable products, and recyclability and end-of-life treatment of sold products

More details can be found in our ESG Strategy available on our Headlam website.

Ethics in action

Q I noticed one of our customers leave their carpet offcuts near our trade counters. How should I handle this?

A Tell your manager immediately. All waste should be disposed of properly, and customers should not leave their waste at our site.

Q I always see one of my colleagues use an under-desk heater as well as have the window open at the same time. I don't want to confront them, but I know it's not environmentally friendly and a waste of electricity, what should I do?

A Please speak to your colleague about not using the heater. Seek support from your line manager if needed. We ask everyone not to use personal under-desk heating as we promote good energy behaviours at work.

SERVING OUR CUSTOMERS

We strive to have a reputation for honesty and integrity by providing, quality and value in our products and services to our customers. We must stand behind what we sell to preserve that trust.

Guidance

In providing our customers with the best possible service, we are committed to:

- Truthful and tasteful advertising, sales and marketing practices
- Accurate representation of our products and services
- Compliance with all laws that promote customer protection

In order to achieve that, we:

- Base our marketing efforts on quality, distinctiveness, brand recognition, fair pricing and promotional programmes, and honest advertising practices
- Do not misrepresent merchandise, service and price attributes nor do we make false claims about competitors' offerings
- State prices accurately
- Accurately describe and illustrate the products Headlam offers for sale, and conform to all applicable rules and regulations
- Ensure all advertisements, packaging, point of purchase displays and promotions are not misleading or deceptive

Ethics in action

Q I noticed that the price for one of our products is wrong on our website. What do I do?

A It is important that we provide up-to-date and accurate information about our products at all times, please speak with your local General Manager.

Q I heard one of my colleagues promising something to a customer that we can't deliver. What should I do?

A Inform your line manager so this can be addressed with the individual.

Q While I was at a customer event, one of my team was making detrimental comments about the transport and warehouse teams to a customer about failed deliveries. What should I do?

A Stop the conversation and coach the individual on the importance of being positive about the organisation, even if we have failed with a delivery. It is up to all of us to be supportive of the organisation at all times.

DEALING WITH SUPPLIERS

We depend on strong relationships with our suppliers, who help us provide the high quality, high value products that our customers demand. We rely on our colleagues to select our partners and manage our partner relationships wisely.

Guidance

We believe in doing business with suppliers who embrace Headlam's standards. That means we expect our suppliers to:

- Demonstrate high standards of ethical behaviour
- Operate in full compliance with all laws and regulations applicable to their operations
- Comply with Headlam's Supplier Ethical Code of Conduct

Headlam will not knowingly do business with suppliers who do not comply with Headlam's Supplier Ethical Code of Conduct, regardless of whether such practices are permitted by applicable law.

Ethics in action

Q I read in the news about one of our suppliers being fined for breaching environmental laws, what should I do?

A You should raise this issue with your line manager or local General Manager immediately.

Q One of our suppliers always submits incomplete or inaccurate documentation with their shipments, should I be concerned?

A Yes, we require all suppliers to maintain transparent and up-to-date records to demonstrate compliance with applicable laws. Please make your line manager or local General Manager aware of any issues.

Q One of our suppliers may be employing children, but their contract won't be reviewed until next year. What should I do?

A Please report this to your local General Manager.

INTERNATIONAL TRADE LAWS

It is essential that we comply with international trade regulations and with the laws and regulations in all the countries where we operate.

Guidance

Anyone who works for, or with Headlam must stay alert and informed when involved in cross-border transactions. That means:

- Arranging all relevant import and export licences, permits and certificates
- Reviewing all third-party documents
- Ensuring correct import and export classification, valuation, and country of origin for all cross-border shipment
- Knowing where Headlam is authorised to operate and not violate trade sanctions against countries, entities, or individuals
- Using only approved customs brokers and freight forwarder, making sure they meet our due diligence requirements
- Reporting requests to boycott entities based on gender, ethnicity, location, or national origin to your local General Manager and HR
- Looking for warning signs that could put Headlam at risk of cross-border shipments to or through a prohibited territory or to a prohibited end-user

Ethics in action

Q Our facility uses a customs broker to file import declarations and maintain necessary records. Is this acceptable?

A It is common to use customs brokers for imports and exports and they can house records. However, in most jurisdictions, importers and exporters are accountable for recordkeeping. So, as well as your customer broker keeping records, you must also maintain them in line with local regulations and our own guidance.

Q Our customs broker is telling us to use a certain tariff classification for an import. Should I agree?

A No. Customs brokers often aren't familiar enough with our products and processes to decide this. Furthermore, Headlam is responsible for providing accurate information, not the broker. Our product and category duty codes are set in our systems, if there are any questions on these, please raise it with your line manager or the local General Manager.



FINANCIAL INTEGRITY

All of us play a part in safeguarding against fraud and ensuring everything we report is accurate and compliant with the relevant laws and regulations.

Guidance

Internally, we rely on the accuracy of financial information reported within the business as the basis on which we make important decisions. Every aspect of our business makes its way into financial information whether it is costs, savings, investments, or revenue.

This means:

- Ensuring all transactions are properly authorised, recorded and reported as required
- Following all Headlam policies and procedures at all times which will ensure we always comply with internal control.

Our internal information is the basis of what we report externally, so for our external reporting to be accurate, our internal information must be too.

Externally, our partners and investors rely on our reporting and our business records to be accurate and complete. We don't need to disclose everything externally because many aspects of our business are commercially sensitive. What we do report must be open and honest about our business and performance – good and bad.

Protecting against fraud

All of us play a part in safeguarding against fraud and ensuring everything we report is accurate and in compliance with the relevant laws and regulations.

Fraud can happen in a number of ways:

- Theft
- Giving false information for personal gain
- Failure to disclose required information
- Distortion, suppression or falsification of records
- Using your position to influence others to do any of the above on your behalf

At an individual level, fraud can include theft through false expense claims or other means. For example overstating hours worked, or stealing company property. It's essential that we all guard against fraud, whatever form it takes.

If you suspect fraud, do not investigate it yourself, but instead report it immediately to your line manager and the HR team,

or consult the Speak Up Policy to ensure it is investigated in the proper way. Please consult our Fraud and Anti-Money Laundering Policy for more details.

Buying and selling Headlam shares

If you buy or sell Headlam shares or encourage others to do so because of confidential information you know about, this is classed as 'insider dealing' which is illegal.

If you are on the 'insider list' because of your role then you will need to get permission before you buy or sell shares, and you may not be able to do so during certain periods, for example around financial results and trading updates – known as a 'closed period'. More information about the share dealing rules can be obtained from the Company Secretary.

Money laundering and tax evasion

We must comply with anti-money laundering laws. This means we will do business with reputable customers involved in legitimate business activities, and will only

accept funds from legitimate sources. We will not do business in a way that helps customers, suppliers or other third parties evade tax. Please consult the Fraud and Anti-Money Laundering Policy for more details.

Ethics in action

Q I suspect that a colleague is misusing the Expenses Policy and buying meals for themselves unconnected to travel or business commitments. Should I be worried about this?

A Yes, you should inform both your line manager and the HR team. Do not, under any circumstances, try to investigate this yourself.

Q It's not public knowledge yet, but I know that now would be a good time to buy Headlam shares because we're about to announce a positive update that is likely to make the share price go up. Can I tell my family and friends?

A No, that is classed as insider dealing and is illegal.

GIFTS AND HOSPITALITY

Giving or receiving meals, gifts, hospitality, travel and other items of value can be part of building a good business relationship.

Guidance

That said, the wrong sort of gifts and hospitality could look like an attempt to influence someone's decision-making, even if the intention is completely innocent.

Use common sense and good judgement when deciding what is and what isn't acceptable around providing or receiving gifts and hospitality:

- Make sure all gifts have a business purpose and do not violate local laws or the ethical policies of the other party
- Consider timing and intention behind a giving or receiving gifts and hospitality
- Consider whether the gifts or hospitality are reasonable and justifiable to give or receive

Prior approval from the Chief Executive is required for any gifts or hospitality involving government officials or representatives.

Seek guidance if you work in procurement and are responsible for selecting vendors and suppliers. Equally you should seek guidance if you work in sales before offering gifts or hospitality to current or prospect customers.

All hospitality or gifts received should be declared to and recorded by the relevant line manager.

Any gifts or hospitality with a value of £250 or above, should be registered in the Hospitality and Gifts Register, which is maintained by the Company Secretary.

For more details, please consult our Gifts and Hospitality section of our Anti-Bribery Corruption Policy.

Ethics in action

Q In recognition of our good working relationship, I'd like to buy a customer some tickets to a sporting event I'm attending. Is this allowed?

A It depends on the circumstances. The value of the tickets, the timing of the event in light of pending or upcoming contract negotiations, and the nature of the relationship with the customer all play a role. Please speak with your line manager before proceeding.

Q A potential new vendor has sent me a bottle of champagne as a holiday gift. However, we are still in the bid process. I've checked, and the value of the champagne is £50. Can I accept it?

A If you weren't in a bid process this would probably be fine, but because of the timing, it could look compromising, so you should politely decline the gift and return it.

BRIBERY AND CORRUPTION

At Headlam, we do not tolerate any form of bribery or corruption. We never offer, give or accept bribes in order to gain a business advantage.

Guidance

Bribery can take many forms – it isn't simply cash in exchange for business. Bribes can take the form of gifts, travel, entertainment, offers of jobs or internships, charitable donations or anything else that has value to the recipient. As well as new contracts, bribes can include offers to speed up approval processes, to obtain licences or permits, or to reduce tax or other liabilities.

It is therefore important to:

- Undertake due diligence on our partners to make sure they uphold our stance against bribery
- Record all transactions accurately to avoid inadvertently facilitating bribery
- Always report any offer or request you feel uncomfortable with to your line manager, a member of the HR Team or the Company Secretary

Ethics in action

Q A customs broker says he can speed up processing times for our goods if we pay a special handling fee. Is this ok?

A Not without a thorough investigation. Any request for extra fees must be reviewed by our Company Secretary.

Q A customer's sales director sits on the board of a local charity and has asked for a contribution as part of the negotiations for our new contract. Can I make the donation?

A No. Either politely decline, or pass the request to the Company Secretary or HR.

Q We have been told that a particular local sales agent is the key to winning business in a new market. Can we appoint them?

A Possibly, but only after you have contacted our Company Secretary to ensure the proper steps are taken.

FAIR COMPETITION

We're committed to free competition based purely on the merits of our products and services, and abide by all relevant anti-trust and competition laws.

Guidance

We don't engage in any kind of understanding with competitors on pricing, market allocation or anything else that could restrict competition and/or distort the market.

To ensure we play our part in fair competition, it is essential to:

- Never engage in any formal or informal agreement or information exchange with competitors or potential competitors about competitively sensitive issues such as pricing, territories, inventory, contract terms or intellectual property
- Gather intelligence about competitors and their customers or suppliers legally and ethically, and only using public sources or publicly available information to obtain such intelligence
- Never access another company's confidential information or encourage anyone to give confidential information, including from competitors' former employees
- Always treat customers in a manner that respects their independence, and never interfere with their freedom to set their resale prices

Ethics in action

Q I received a competitor's price list from one of our customers. Can I use it?

A If a price list has been published and is in the public domain, you can use it. However, it is not permitted to use a customer's confidential terms or conditions.

Q A representative from a competitor began discussing their pricing strategy at a trade association meeting. I told them I thought it was inappropriate and left the meeting. Did I do the right thing?

A Yes. By doing so, you reduced any suspicion that you were trying to fix prices. You should also report the incident to our Company Secretary or Chief Customer Officer and not share the information with anyone else.

Q At an event I met one of our competitor's representatives who enquired about our latest product range. Should I discuss this?

A People from across our industry mix frequently during events. Whilst doing this, we must always be aware of the risks discussing Headlam's business, performance, suppliers ranges, customers with competitors. If these matters are not in the public domain, they should not be discussed.

POLITICAL INVOLVEMENT AND CONTRIBUTIONS

Headlam operates in many different areas across the UK and abroad. This may bring us into contact with politicians on subjects of legitimate concern to our business, our colleagues and the communities in which we operate.

Guidance

It's Headlam's policy not to make any donations for political purposes in the UK or to donate to political parties or incur political expenditure outside of the UK.

Regarding any political engagement, the following guidance applies:

- Headlam supports people's right to take part in political activities, provided their involvement does not conflict with their duties at Headlam. Any political involvement on your part does not suggest Headlam's involvement or approval
- Inform your line manager and the HR team in advance if you plan to seek or accept any kind of public office, or if you plan to hold any business meetings with government officials or politicians
- Never hire a government official or lobbyist to perform services for Headlam unless you have specific authorisation from our Chief Executive

Ethics in action

Q I'm volunteering for a local political campaign and want to print campaign materials at work. Is that, OK?

A No. Never use company resources for outside political activity.

Q A business contact suggested I meet an influential local official who can help with Headlam's business strategy. Should I go?

A No. Either politely decline, or pass the request to the Company Secretary or HR.

COMPANY RESOURCES

All colleagues are responsible for protecting company property and resources from damage, theft or misuse. Similarly, it is essential we all use company equipment and communication systems responsibly, and in a way that does not reflect badly on Headlam.

Guidance

In the course of our work, we use Headlam resources ranging from intellectual property to equipment, company money, facilities, and information. Don't forget that our own time at work is also a company resource. While using company resources responsibly, you should:

- Use company property and resources in a way that is reasonable, responsible and respectful
- Never use company resources in a way that is unlawful, unethical or contrary to any of our policies
- Follow specific, more detailed guidance that may be included in certain policies (for example, our Company Car Policy) or by certain departments (for example, around the use of computers, phone or tablets)

Occasional use of company equipment for personal reasons is permitted, as long as it does not reduce the value of Headlam's assets, incur additional costs, place company information at risk, interfere with productivity or place Headlam at risk of liability.

Ethics in action

Q One of my colleagues seems to be running an outside consulting business during company time and using his Headlam laptop to do so. Should I say something?

A Yes. If you have suspicions about a colleague misusing company time and assets you must raise them to HR, or consult the Speak Up Policy.

Q My printer at home is broken. Can I print out my child's school report on the printer at work?

A Yes. It's fine to use a work printer for occasional personal use so long as long as it doesn't interfere with your job.

Q I want to download a film at home in the evening - can I use my company laptop?

A Although you are at home, by using your Headlam laptop, you are effectively 'inside the company'. For cybersecurity reasons we do not allow unauthorised programs, apps or media to be downloaded or streamed to your work company laptop, phone or tablet.



CONFIDENTIALITY AND PRIVACY

A reputation for honesty, reliability and discretion is hard to win, but easy to lose. That's why Headlam is committed to protecting the confidentiality and privacy of both our own information, and that of organisations or individuals we work with.

Guidance

Confidential information is a broad term that includes information about company plans and strategy, colleagues, customers, suppliers and even competitors. We comply with all applicable laws and regulations protecting confidential information, including laws on the protection of personal data and the protection of the right to privacy. Some examples include personal data, customer information, marketing or sales forecasts, supplier identification, business results and information about potential mergers or acquisitions.

In dealing with confidential information, it is important to:

- Only share such information with colleagues who have a legitimate need to know
- Never share confidential information with anyone outside Headlam unless you have taken the necessary steps to protect. For example, through a non-disclosure agreement or obtaining consent from the owner of the confidential information
- Make sure you do not leave confidential information in places where others may find it
- Avoid discussing or working with confidential information in a public area where a conversation may be overheard or the data accidentally disclosed
- Take particular care, at any time, to safeguard your laptop, phone and/ or tablet

Ethics in action

Q I recently joined Headlam from a competitor who is successful in a market we are looking to enter. I have a copy of my former employer's business plan. Can I use this information in my new position?

A No. All Headlam colleagues are prohibited from using confidential information from their previous employers. Please contact a member of the HR team to let them know you have this information.

Q I recently met a customer for lunch at a busy restaurant. He started talking loudly and in detail about our business. This made me uncomfortable - what should I have done?

A The right thing to do would be to stop the conversation, saying politely that it would be better to have this kind of conversation in a more private place. We should always be aware of our surroundings when discussing Headlam business in public.





headlam

Our code of ethics

Work the Headlam Way through displaying our values



Keep each other
safe and well



Lead by example,
we are all leaders



Work together,
with everyone



Keep improving,
everywhere



Act sustainably, use less,
waste less, give back



Get it done,
brilliantly

And always, do the right thing!