



Code of Business Ethics

January 2010

Preamble

In regards to Workforce Wellness Limited (hereinafter called "the Company") in all of our business operations, it is important to retain a set of core values and approaches to the process of doing business. The Company recognises that it has particular obligations to all those with whom it has dealings – customers, employees, contractors, intermediaries, resellers, suppliers, competitors and the wider community. The reputation of the Company and its Directors' and confidence of those with whom it deals are vital. The Company demands and maintains the highest ethical standards in carrying out its business activities. Corrupt practices of any sort will not be tolerated. The Company will monitor ethical performance regularly.

Relations with Customers

The Company believes that integrity in dealings with customers is a prerequisite for a successful and sustained business relationship. This principle governs all aspects of the Company's approach to its customers. The Company will aim to provide products/services which give good value and consistent quality. It will not give deliberately inadequate or misleading descriptions of products/services. In all advertising and other public communications, untruths, concealment and deliberate overstatements will be avoided. The Company will aim to provide a high standard of service in its efforts to maintain customer satisfaction and co-operation. No employee may give money or any gift of significant value to a customer, nor may gift or service be given which could be reasonably construed as being intended as a bribe. The Company policy on gifts and hospitality from contacts is contained in the Staff Handbook. It is designed to preserve the integrity of the relationship between the Company and its business contacts and to safeguard the reputation of the Company. All employees are expected to comply with this policy and to raise with their Team-Leader/Immediate Manager if there is any doubt about the acceptability of a gift or the offer of hospitality. The Company will maintain the confidentiality of customer information.

Relations with Employees

Relations with all employees are based on respect for the dignity of the individual. The Company will recruit and promote employees in accordance with its Equal Opportunities Policy which is set out in the Staff Handbook and available separately upon request. The Company will seek to provide a clean, healthy and safe work environment in line with best practice. The Company and all employees will observe the Health and safety Policy, which is set out in the Staff Handbook and available separately upon request. In recognition of the efforts of the individual in helping to create the success of the Company, the Company will seek to maintain a framework of fair and just remuneration policies and structures. Pay systems will seek to recognise both the contribution of individuals and the performance of the sector of the business in which they work. The Company will seek to encourage and help employees at all levels to develop relevant skills and progress their careers within the Company. The Company will seek to explain the purpose of its activities and individual jobs, foster effective communication and involve employees in improving their

work and that of the Company as a whole. Employees will not use for personal gain or any purpose except that for which it is given information received by them in the course of business dealings and will maintain the confidentiality of confidential information at all times relating to the Company and in respect of which the Company owes an obligation of confidence to any third party. Any personal interest that an employee of the Company or a member of his or her immediate family has in relation to the Company's business must be disclosed to the Company by the employee. The Company will not tolerate any sexual, physical, verbal or mental harassment of its employees. Whilst the Company endeavours to maintain the fullest communication with each employee as an individual, it recognises the need to develop effective processes for communication and consultation with employees in the natural groupings in which they work and, where appropriate, for individuals to be suitably represented in discussions.

Relations with Suppliers, Intermediaries and all other such Third-Parties

The Company will aim to develop professional relationships with its suppliers, intermediaries and all other such third-parties based on mutual trust. The Company will use all reasonable efforts to pay its suppliers, etc on time and according to agreed terms of trade. The purchasing power of the Company will never be used unscrupulously. Employees will observe the Company's on gifts and hospitality from business contacts in relation to suppliers, etc, which is set out in the Staff Handbook and available separately upon request. The Company will maintain the confidentiality of confidential information concerning the professional relationship between the Company and a supplier, etc.

Relations with the Government and the Local Community

The Company will seek to be a good corporate citizen. It will aim to serve the community by providing products/services efficiently and profitably, and by providing good employment opportunities and conditions. Employees are encouraged to participate in community and civic affairs. The Company will support the community by way of charitable donation(s) under its Charitable Pledge and as part of its Corporate Social Responsibility (CSR), and by the voluntary efforts of its people.

Full CSR policy statements are available upon request covering:

- **Community Outreach Programme (COP)**
- **Environment**
- **Environment Management System**
- **Health and Safety**
- **Business Ethical**
- **Equal Opportunities & Diversity**
- **Sustainability**

Signed by Brian Taylor, Managing Director