

The IEPL believes that it is important for the IEPL and its employees to maintain high ethical standards in order to preserve its reputation in the marketplace.

Good ethics are important to ensure that the IEPL meets not only its objectives in a fair and equitable manner but its wider social responsibilities externally. In addition, the IEPL is committed to ensuring high ethical standards within the workplace.

The procedure that follows provides general guidance on ethics and refers to other policies of the IEPL where necessary. The procedure will be closely monitored and will be developed as necessary to ensure that it meets the needs of the IEPL, its employees and its stakeholders.

Environmental audits will ensure that the IEPL is meeting its aims with regard to environmental impact and ethical behaviour and that its stakeholders perceive the IEPL in a positive light.

### Procedure

1. All employees will be provided with ethics training as part of the induction programme. Ongoing ethics training, as the ethics policy and procedure develops, will be cascaded to employees via Management.
2. All employees are required to adhere to the IEPL's policy and procedure on business ethics. Employees who breach the IEPL's policy on business ethics will be subject to disciplinary action up to and including dismissal.
3. Employees who are faced with a potential breach of the business ethics code or have doubts about an ethical choice they are facing should, in the first instance, speak to their reporting manager.
4. The IEPL has a [Code of Conduct](#) which employees are expected to abide by. A copy of the Code of Conduct and other policies relevant to this procedure are available on the IEPL's Intranet/in the HR Manual.
5. The following areas are included in this procedure. However, this list is not exhaustive and will be developed as required.
  - a. Data protection / Access to employee data.
  - b. Whistleblowing.
  - c. The giving and receiving of gifts.
  - d. Confidentiality.
  - e. Relationships with competitors, suppliers, advertisers, etc.
  - f. Equal opportunities, discrimination and harassment.
  - g. Moonlighting.
  - h. The environment.
6. This IEPL endorses fully and adheres to the principles of data protection. These data protection principles are set out in the IEPL's Data Protection / Access to Employee Data policy and all employees are expected to familiarise themselves with its requirements. Employees should ensure that they understand how data protection impacts on their particular role, in particular with regard

to external suppliers and customers. Employees who have any questions on the IEPL's Data Protection/Access to Employee Data policy should speak to their reporting manager in the first instance.

7. The IEPL encourages a free and open culture in its dealings between its officers, employees and all people with whom it engages in business and legal relations. The IEPL recognises that effective and honest communication is essential if malpractice is to be effectively dealt with and the IEPL's success ensured. Employees should refer to the IEPL's Whistle-blower Policy and procedure which provides guidance to employees who feel that they need to raise issues relating to the IEPL with someone in confidence.
8. The IEPL does not believe that the giving and receiving of gifts from suppliers and customers is appropriate. In certain circumstances gifts may constitute a bribe. An employee who receives a gift from a customer or supplier, regardless of its value, must inform his or her manager who will decide whether the gift may be kept by the employee or whether it should be returned.
9. A confidentiality clause forms part of all employees' statement of particulars/contracts of employment. During the course of employment employees will have access to information of a confidential and sensitive nature. Employees must not disclose to a third party any IEPL confidential information, either during their employment or after their employment has ended. Confidential information includes information on the IEPL's present or potential customers or suppliers and any information relating to the IEPL's business, including marketing, corporate or financial plans.
10. IEPL recognises that work may result in friendships and closer relationships developing. Relationships may develop not only with colleagues but suppliers and customers. It is natural for relationships to develop in a working environment. While the IEPL has every respect for the privacy of its employees, it asks that all employees consider the impact that personal relationships can have on the IEPL.
11. IEPL is committed to equality of opportunity and diversity in the workplace. It is the IEPL's policy to treat all job applicants and employees fairly and equitably, regardless of their sex, transgender status, pregnancy, maternity leave, age, sexual orientation, religion or belief, marital status, civil partnership status, race, colour, nationality, national origins, ethnic origin or disability. Furthermore, the IEPL will monitor the composition of the workforce and introduce positive action if it appears that this policy is not fully effective. Employees are required to conduct themselves in a way that promotes equal opportunities at all times. Good practice will be promoted by senior management and employees will be provided with relevant training. Employees who feel they have been discriminated against or suffered harassment should speak to a member of Management immediately.

12. *Employees may seek to take up separate employment with another employer or pursue outside business interests while still remaining employed by the IEPL. Although the IEPL has no desire to unreasonably restrict an employee's external activities, it must seek to protect its own interests and those of all its employees. Employees will not be permitted to undertake business activities or other work where the IEPL considers that this is incompatible with its interests or with the employee's health or safety and, in any event, unless employees have obtained prior written authorisation from senior management.*
13. The IEPL is committed to conserving the Earth's resources and to do what it can to reduce any negative effects it has on the environment. Employees are required to use the IEPL's equipment and materials wisely and reduce wastage where possible. Employees can play a positive role in helping the environment by recycling all non-confidential waste, using printers and photocopiers with care and switching off electrical equipment which is not in use.