

Business Ethics and Responsible Supply Chain Policy

for Subcontractors and Employees

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INTEGRITY AND PROFESSIONAL INDEPENDENCE

PURPOSE AND RESPONSIBILITY

Changing Footprint will conduct business honestly, respect human rights and maintain proportionate ethical controls over its work and supply chain. This policy applies to Changing Footprint's Directors, employees and anyone acting on our behalf. Changing Footprint's Director is accountable for due diligence, registers, action tracking and truthful external statements. Associates, agents and subcontractors must accept relevant requirements through their engagement terms.

BRIBERY AND IMPROPER INFLUENCE

Never offer, request, give or accept bribes, kickbacks, secret commissions or facilitation payments, directly or through another person. Do not use charitable donations, sponsorship or political contributions to obtain improper advantage. If there is an immediate threat to personal safety, prioritise safety and report any payment and circumstances as soon as safe. Record it accurately and obtain advice.

GIFTS HOSPITALITY AND EXPENSES

Cash and cash equivalents are prohibited. Decline gifts or hospitality connected to an active procurement decision or intended to influence judgement. Other offers must be modest, infrequent, lawful and consistent with the recipient's rules. Record all offered or received gifts and hospitality, including refusals, with value, parties and purpose. Obtain approval from Changing Footprint's Director in advance wherever practicable. Expenses must be genuine, supported and accurately described.

CONFLICTS AND OBJECTIVITY

Declare actual, potential or perceived conflicts before appointment and whenever they arise, including personal relationships with client staff, financial interests, referral fees and competing engagements. Record the conflict, assess independence and agree safeguards such as disclosure, recusal or separate review. Obtain informed client agreement where appropriate. Decline or end work where the conflict cannot be managed. Commercial interests must not alter findings or recommendations.

FAIR COMPETITION AND TRUTHFUL CLAIMS

Do not fix prices, rig bids, share competitively sensitive information unlawfully or allocate markets with competitors. Provide accurate tender, financial, qualification and performance information; do not conceal material facts or overstate achievements. Verify evidence before signing declarations and correct material inaccuracies promptly. Do not claim certification, accreditation, audit completion or legal compliance without a supportable basis.

HUMAN RIGHTS AND ETHICAL PROCUREMENT

LABOUR STANDARDS

We oppose forced labour, trafficking, debt bondage, child labour and exploitation. Workers must be free to leave employment on lawful terms and must not surrender identity documents or pay recruitment fees to obtain work. Respect association and collective bargaining, safe working conditions, fair wages, reasonable working hours, regular employment, equal treatment and humane treatment. Apply the ETI Base Code principles and applicable law, using the more protective standard where lawful.

SUPPLIER CHECKS

Before appointment, assess supplier identity, service, location, labour model, subcontracting, adverse information and relevant policy evidence. Give greater scrutiny to labour-intensive services, recruitment, opaque subcontracting and higher-risk goods or regions. Ask about pay, working hours, recruitment fees, worker voice, grievance access and remedial action. Check competence, insurance, confidentiality and conflicts alongside labour and environmental risks.

CONTRACTS AND MONITORING

Include proportionate ethical requirements, reporting duties, approval for onward subcontracting, access to relevant evidence and cooperation with reviews. Require relevant standards to flow down the supply chain. Review higher-risk suppliers at least annually and when concerns arise; review lower-risk suppliers on renewal or material change. CF POL 02 covers environmental and sustainable procurement.

ETHICAL AUDITS

Maintain a risk-based audit programme. Use documented questionnaires and evidence reviews for low-risk services; use deeper checks, confidential worker engagement or competent independent audits where risk or contractual requirements justify them. Record scope, date, evidence, limitations, findings and corrective actions. Distinguish a self-assessment from an independent ethical audit. No audit may be described as completed until evidence exists.

OTHER PROHIBITED ACTIVITY

Changing Footprint will not host arms fairs or knowingly develop, produce or trade indiscriminate weapons used in human rights violations. Investigate credible links in relevant procurement and avoid contributing to conflict or abuse. Assess concerns proportionately and record decisions rather than making unsupported blanket assurances.

SPEAKING UP AND CORRECTIVE ACTION

REPORTING CONCERNS

Report suspected bribery, fraud, exploitation, unlawful conduct, concealment or serious malpractice to Changing Footprint's Director. Verbal, written and anonymous reports are accepted. Preserve evidence safely, avoid confrontation that puts anyone at risk and call emergency services if someone is in immediate danger.

PROTECTION AND HANDLING

No retaliation is permitted for honestly held concerns, participation in an investigation or lawful protected disclosures. Restrict information to those who need it and explain confidentiality limits. Acknowledge normally within five working days, assess immediate risk, appoint an impartial reviewer and agree updates. Individuals may seek union, legal or Protect advice and use appropriate external reporting routes; statutory protection depends on the applicable legal criteria.

REMEDIATION

Protect affected people first. Do not respond to suspected exploitation in a way that exposes workers to retaliation or sudden loss of support. Seek competent advice, consider lawful referral routes and engage suppliers on corrective action where safe. Set owners, deadlines and evidence requirements. Suspend or terminate activity for serious or unremedied breaches in line with legal and contractual duties; verify that remediation is effective.

TRANSPARENCY STATEMENT

At least annually, assess whether statutory modern slavery reporting duties apply, including the qualifying turnover and business conditions. Where applicable, publish an approved, signed statement meeting the legal requirements. Otherwise, provide a proportionate voluntary account when needed. Describe only the actual reporting period, business and supply chain, checks, training, findings, actions and next steps. This policy is not a retrospective annual transparency statement.

EVIDENCE AND REVIEW

Maintain conflicts, gifts and hospitality, supplier risk, audit, concern and corrective action records, restricting sensitive information. Changing Footprint's Director reviews this policy and ethical performance annually, including overdue actions and repeat issues. Record the legal applicability assessment and verify all public ethical claims before issue.

REFERENCE GUIDANCE

ETI Base Code — <https://www.ethicaltrade.org/eti-base-code>

Government modern slavery statement guidance — <https://www.gov.uk/guidance/publish-an-annual-modern-slavery-statement>

Protect advice — <https://protect-advice.org.uk/>

Reviewed and approved by: Mark Taylor, Changing Footprint Director

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