

Code of Conduct

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1. **Our ethics principles**

Behaving ethically is an essential part of working for Speedy. It is fundamental to how we do business and is vitally important to the reputation and success of our company. Our three principles of ethical business conduct are:

We:

- are honest, transparent and trustworthy in all our dealings both within Speedy and in all our external business relationships;
- respect the privacy of individuals and other organisations with whom we work; and
- investigate reports of potential breaches of the Code of Conduct.

2 **Code of Conduct**

- 2.1 This Code of Conduct sets out what each of these ethics principles means in more detail and how they link to our key policies.
- 2.2 Our Code of Conduct makes it clear that we obey national laws and regulations in all countries in which we operate, but we will not tolerate local customs which are illegal if carried out in the UK, or unethical.
- 2.3 This Code of Conduct forms part of each employee's contract of employment.
- 2.4 All employees will receive a hard copy of our guide to business ethics, which summarises Speedy's key policies and processes across the business, including this Code of Conduct.
- 2.5 Every employee will be required to complete Speedy's formal on-line Code of Conduct training after joining Speedy and on an annual basis thereafter.

3 **Our commitment to you**

- 3.1 Our directors and managers will lead by example and we will expect and recognise ethical conduct at all levels and in all areas of our business.
- 3.2 We will ensure that the Code of Conduct applies to all our staff and third parties working for us. In particular all contractors, including consultants, casual or agency staff, all sub-contractors, partners and suppliers with whom we deal must follow our Code of Conduct.
- 3.3 We prohibit retaliation against anyone because they have reported a suspected breach of the Code of Conduct or assisted in any investigation of a suspected breach, so long as they have done so in good faith.
- 3.4 We will review our Code of Conduct and measure compliance with it on an ongoing basis. Our business practices will be changed if they are not in line with the Code.

4 **Principle 1: we are honest, transparent and trustworthy in all dealings**

What does this mean?

- 4.1 You must not be dishonest or deceitful. This covers any type of deception or dishonesty. It includes any abuse of your position to gain a material advantage for yourself or the business.
- 4.2 We believe in free and competitive markets.
- 4.3 We comply with the laws of the UK and those of other countries where we do business.
- 4.4 We require all of our employees to operate to the highest ethical standards in their business dealings.

What must I do?

- 4.5 You must ensure that:
- our appointment of any supplier, partner or contractor with our business provides for their compliance with this Code of Conduct;
 - where operating overseas and where local law is less restrictive than this Code of Conduct, the Code must be followed;
 - you make certain that all written or oral representations concerning Speedy's products and services are factual;
 - you make a good faith effort to identify where any competitor information held in Speedy's records has come from;
 - you comply with our Anti-Bribery Policy; the Hospitality, Gifts & Sponsorship Policy; the Competition Law Policy and the Anti-Slavery and Human Trafficking Policy (each are available on the Hub);
 - you report any actual or suspected conduct that breaches this Code of Conduct (see further below).

Which behaviours are not permitted?

- 4.6 We do not permit:
- conflicts between an individual's private interests and the interests of the business (which includes working, without prior approval, for another organisation whilst working at Speedy). If there is a possible conflict you must report it to ;
 - payment of bribes or inducements. Bribes may include gifts or hospitality that do not fall within the Hospitality, Gifts & Sponsorship Policy. Any permitted payments must always be registered in Speedy's Hospitality, Gifts & Sponsorship register on the intranet;
 - receipt by us, or any of our business associates, of bribes or inducements;
 - involvement in situations that might suggest we have an illegal agreement with a competitor including in relation to:
 - the prices of our products or services;

- the allocation of customers or territories between us and competitors;
- the distribution of our products and services;
- the scope of product or service research and development;
- our promotional or marketing strategies; or
- tenders to third parties;
- any communications with competitors without first seeking clearance from your Manager;
- the taking of illegal or unethical action to drive a competitor out of a market;
- the taking of any action to induce a customer to establish a certain resale price for Speedy's products or services; or
- false or malicious reporting of unethical conduct.

4.7 If you suspect a third party or one of our people to be involved in conduct that breaches this Code of Conduct you should report it to your line manager or alternatively, report it through the other whistleblowing channels (see our Speak Up Whistleblowing Policy on the Hub for further information). There will be no retaliation against you for making a report in good faith (even if it turns out that you are mistaken). All reports of possible breaches will be reviewed/investigated in line with our policy..

Which policies provide more information?

The Anti-Bribery Policy
The Hospitality, Gifts & Sponsorship Policy
The Competition Law Policy
Anti-Slavery and Human Trafficking Policy

Are there any specialists I can talk to?

The Legal Department
The Risk and Assurance Department

5 Principle 2: we respect the privacy of individuals and other organisations with whom we work

What does this mean?

- 5.1 We handle and store all personal and confidential data appropriately. We comply with all relevant data protection and privacy laws.
- 5.2 We protect others' confidential business and proprietary information.

What must I do?

5.3 You must:

- process all personal data fairly, lawfully and transparently;
- only obtain personal data for a specified lawful purpose in accordance with our Privacy Notices which can be found at:
 - Privacy Notice (see the Speedy website): and
 - Internal Privacy Notice (see the Legal pages on the Speedy Hub):
- ensure the personal data you use is not excessive or irrelevant to the lawful purpose you are using it for;
- ensure the personal data is both accurate and up to date;
- only keep the personal data for as long as is necessary and in accordance with our Personal Data Retention Policy;
- handle personal data in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage; and
- report any personal data security breach in accordance with the Personal Data Security Breach Policy (available on the Hub for further guidance).

Which behaviours are not permitted?

5.4 You must not:

- share the personal data with other organisations where such sharing is not in accordance with our Privacy Notices or provided for in an agreement with that party;
- keep information longer than is necessary or in breach of our Personal Data Retention Policy;
- provide copies of personal data in response to a subject access request, without first referring such request to the relevant Data Manager who will deal with such request, in accordance with our Individual Rights Policy; or
- disclose personal data to anyone over the telephone without first having verified their identity.

Which policies provide more information?

Privacy Notice (Speedy website)
Internal Privacy Notice (Speedy Hub)
Personal Data Retention Policy
Personal Data Security Breach Policy
Individual Rights Policy

Are there any specialists I can talk to?

Relevant Data Managers for: Customers; Suppliers and Employees
The Legal Department
The Risk and Assurance Department

6 Principle 3: we will investigate reports of potential breaches of this Code of Conduct

What does this mean?

- 6.1 We will take seriously any allegations of breaches of this Code of Conduct and undertake investigations to ascertain the extent of any breach.
- 6.2 We will prohibit retaliation against anyone or less favourable treatment of anyone because they have reported a suspected breach of this Code of Conduct or assisted in any investigation of a suspected breach, so long as they have done so in good faith.

What must I do?

- 6.3 You should report any concern you have about possible breaches of our Code of Conduct.
- 6.4 There are three ways of doing this:
 - speak to your Manager. Your Manager will investigate, and if you request, keep the matter confidential where possible. For example, there may be a legal reason for disclosure or in small departments it may be difficult for to investigate thoroughly whilst protecting your identity;
 - contact the Head of Risk and Assurance, the General Counsel and Company Secretary or the Chief People Officer; or
 - alternatively see our Speak Up Whistleblowing Policy on the Legal Hub or our website for more details on how to submit a whistleblowing report which you can also do anonymously.

How will we handle the matter?

- 6.5 Once you have told us of your concern, we will assess it and consider what action may be appropriate. This may involve an informal review, an internal inquiry or a more formal investigation. We will tell you who will be handling the matter, how you can contact them, and what further assistance we may need from you. If you ask, we will write to you summarising your concern and setting out how we propose to handle it. If we have misunderstood the concern or there is any information missing please let us know.
- 6.6 When you raise the concern it will be helpful to know how you think the matter might best be resolved. If you have any personal interest in the matter, we do ask that you tell us at the outset. If we think your concern falls more properly within our Grievance Policy, Anti-Harassment Policy or other relevant procedure, we will let you know.



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- 6.7 Where appropriate, we will give you feedback on the outcome of any investigation. Please note, however, that we may not be able to tell you about the precise actions we take where this would infringe a duty of confidence we owe to another person.
- 6.8 While we cannot guarantee that we will respond to all matters in the way that you might wish, we will strive to handle the matter fairly and properly. By using this policy you will help us to achieve this.

Which policies provide more information?

Speak Up Whistleblowing Policy

Are there any specialists I can talk to?

The Legal Department
The Risk and Assurance Department
The People Department