

<p>MurphyCobb &amp; Associates Limited Ethical Policy 2020</p>
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## 1. Purpose

- 1.1 MurphyCobb & Associates Limited of 1 Lyric Square, Hammersmith, London W6 0NB and its subsidiaries ("MurphyCobb") are committed to the practice of responsible corporate behaviour.
- 1.2 Through its business practices MurphyCobb seeks to protect and promote the human rights and basic freedoms of all its employees and agents.
- 1.3 Further MurphyCobb is committed to protecting the rights of all of those whose work contributes to the success of MurphyCobb, including those employees and agents of suppliers to MurphyCobb.
- 1.4 MurphyCobb is also committed to eliminating bribery and corruption. It is essential that all employees and persons associated with MurphyCobb adhere to this policy and abstain from giving or receiving bribes of any form.
- 1.5 This policy is non-exhaustive, and all aspects of MurphyCobb's business should be considered in the spirit of this policy.

## 2. Human Rights

- 2.1 MurphyCobb is vehemently opposed to the use of slavery in all forms; cruel, inhuman or degrading punishments; and any attempt to control or reduce freedom of thought, conscience and religion.
- 2.2 MurphyCobb will ensure that all of its employees, agents and contractors are entitled to their human rights as set out in the Universal Declaration of Human Rights and the Human Rights Act 1998.
- 2.3 MurphyCobb will not enter into any business arrangement with any person, or organisation which fails to uphold the human rights of its workers or who breach the human rights of those affected by the organisation's activities.
- 2.4 MurphyCobb are committed to inclusion and diversity across race, gender, age, religion, identity and experience in all countries in which we operate or seek to operate in the future.

## 3. Employees' and Consultants' ("Workers'") Rights

- 3.1 MurphyCobb is committed to complying with all relevant employment legislation and regulations. MurphyCobb regards such regulations and legislation as the minimum rather than the recommended standard.
- 3.2 No worker should be discriminated against on the basis of age, gender, race, sexual orientation, religion or beliefs, gender reassignment, marital status or pregnancy. All workers should be treated equally. Workers operating in the same territories with the same experience and qualifications should receive equal pay for equal work.
- 3.3 No worker should be prevented from joining or forming a staff association or trade union, nor should any worker suffer any detriment as a result of joining, or failing to join, any such organisation.
- 3.4 Workers should be aware of the terms and conditions of their employment or engagement from the outset. In particular workers must be made aware of the salary or fees that they receive, when and how it is to be paid, the hours that

they must work and any legal limit which exists for their protection. Workers should also be allowed such time off as is granted by legislation.

- 3.5 MurphyCobb does not accept any physical punishment, harassment in any form, or bullying in any form.

#### **4. Environmental Issues**

- 4.1 MurphyCobb is committed to keeping the environmental impact of its activities to a minimum.
- 4.2 As an absolute minimum, MurphyCobb will ensure that it meets all applicable environmental laws in whichever jurisdiction it may be operating.

#### **5. Conflicts of Interest**

- 5.1 MurphyCobb holds as fundamental to its success the trust and confidence of those with whom it deals, including clients, suppliers, employees and consultants. Conflicts of interest potentially undermine the relationship of MurphyCobb with its partners.
- 5.2 All officers, employees, consultants and other representatives of MurphyCobb are expected to act honestly and within the law.

#### **6. Information and Confidentiality**

- 6.1. Information received by employees, or consultants of MurphyCobb will not be used for any personal gain, nor will it be used for any purpose beyond that for which it was given.
- 6.2 MurphyCobb will at all times ensure that it complies with all applicable requirements of the Data Protection Legislation, including the General Data Protection Regulation (Regulation (EU) 2016/679) ("GDPR") any legislation which succeeds the GDPR.

#### **7. Suppliers and Partners**

- 7.1 MurphyCobb expects all suppliers and partners to work towards and uphold similar ethical and moral standards.
- 7.2 MurphyCobb reserves the right to request information from suppliers regarding the production and sources of goods supplied.
- 7.3 MurphyCobb reserves the right to withdraw from any agreement or other arrangement with any supplier or partner who is found to have acted in contravention of the spirit or principles of this Ethical Policy.

#### **8. Bribery and Corruption**

- 8.1 MurphyCobb is fundamentally opposed to acts of bribery or corruption and has formulated an Anti-Bribery and Anti-Corruption Policy, which may be obtained from Selwyn Pye, Director of Operations <selwyn.pye@murphycobb.com>).

This policy has been approved & authorised by:

**Name: Pat Murphy**

**Position: Founder**

