

Introduction

Cadogan (and all companies set up under the Cadogan name) is committed to working in accordance with the requirements of our industry, and with the highest standards of ethical conduct, through our policies and procedures. We will conduct business in a responsible and ethical manner, to the highest standards of transparency, integrity and corporate governance.

Our Companies

Cadogan operates in the property management, investor and development sector and is located in London. We only operate within the United Kingdom.

Our supply chains (the people or companies we purchase goods or services from) generally operate in the United Kingdom and Europe primarily and the core of our workforce is UK based.

Relevant Policies

As part of our commitment to embracing and embodying Corporate Social Responsibility, we have implemented this Ethics and Ethical Purchasing Policy and other policies which set out our approach to CSR, and/or are linked to CSR, as follows: -

- Anti-Slavery and Human Trafficking Statement
- Bribery and Corruption and Conflicts of Interest and Anti-Money Laundering Policy
- Code of Conduct
- Confidential Reporting (Whistle-blowing) Policy
- Corporate Social Responsibility Policy
- Equal Opportunities Policy
- Health and Safety Policy
- Working Time

Parameters of this Policy

The purpose of this policy is to:

- be clear as to our responsibilities with regards to ethics, and ethical purchasing;
- ensure that staff understand these responsibilities so that they can act in accordance with and in the spirit of them, and understand that Cadogan as their employer takes these matters seriously;

- clarify the expectations that we have of the suppliers and third parties we have business relationships with (and this policy should be read alongside our Anti-Slavery and Human Trafficking Statement);
- promote good workforce and environmental standards in the supply chain of goods and services both to ourselves and to our clients;
- protect our reputation of honesty and integrity.

Expectations

Staff

Cadogan companies have a Staff Handbook which contain detailed policies and procedures regarding our expectations of employees in terms of having an ethical approach to business. It also explains in more detail how we will treat our employees ethically (see 'Relevant Policies' section above).

Staff are required to act professionally and comply with this policy and Cadogan's other policies and procedures. Failure to comply could result in disciplinary action being taken in line with our disciplinary procedures. If in need of guidance, staff should speak with their Manager in the first instance.

As a summary, staff are expected to:

- Treat others with respect regardless of their age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation, in line with our Equal Opportunities Policy.
- Hold paramount the safety, health and welfare of the public, themselves, their colleagues, and any clients etc. in the performance of professional duties, in line with our Health and Safety Policy.
- Respect confidential and privileged information that they access as part of their duties.
- Adhere to this policy with regards to any decision-making they may be involved in as part of their role, with regards to procurement or the management of staff, suppliers and/or any relevant third party.
- Act in line with the values of Cadogan when carrying out professional duties.

Cadogan and Suppliers/Relevant Third Parties

Cadogan and any suppliers/relevant third parties that are involved in the purchasing/procurement/supply of goods and services, will:

- Require the immediate cessation of serious breaches of this policy and if necessary, terminate the business relationship between them.
- Seek to ensure all employees are aware of their rights and involved in the decisions which affect them.
- Avoid any discriminatory practices against any individuals and against enterprises (in developing countries), in the procurement or supply of employees/agency staff/goods/services etc.
- Recognise official regulation and inspection of workplace standards, and the interests of legitimate trades unions and other representative organisations, where applicable.
- Seek arbitration in the case of unresolved disputes.

Principles

Cadogan will ensure that: -

- Goods and services are purchased which are produced and delivered under conditions that do not abuse or exploit any people, or the environment. These considerations will form part of the procurement process for all goods and services purchased or contracted by Cadogan.
- Employment is freely chosen by giving employees the right to choose work, the freedom of association and the right to collective bargaining where a trade union has been formed or is recognised. Workers have the right to join or form trade unions of their own choosing and to bargain collectively.
- There are safe working conditions for staff and other relevant parties (such as third-party contractors), by providing a safe and hygienic working environment in line with Cadogan's Health and Safety Policy, and any associated policies. This includes nominating senior managers to oversee Health and Safety and taking adequate steps to prevent accidents and injury to health occurring in the course of work by minimising the causes of hazards in the working environment. Employees, workers and all other relevant parties will receive regular and recorded health and safety training, and this will also be made available to all new starters or people newly engaged with Cadogan by some other means i.e. third-party contractors.
- Training that is adequate and relevant will be made available to all staff, based on the nature and responsibilities of their role.
- Cadogan provides clear and easily understood disciplinary, grievance and appeal procedures that are lawful and appropriate, in order to manage disputes or

performance/conduct/absence issues. We also provide a clear contract of employment so that our employees understand the terms of their employment.

- There will be no recruitment or use of child labour, and all recruitment practices will support only employing or engaging individuals who are suitable and legally entitled to fulfil the role/supply the service etc.
- Wages and benefits paid for a standard working week meet national legal standards. Any payments will be made in line with legal regulations including those applied by Her Majesty's Revenue and Customs (HMRC).
- The working hours of staff comply with national laws and will not be excessive. Anyone who wishes to work more than 48 hours per week on a regular basis (including work for other employers) must sign an opt-out to the Working Time Regulations **before** carrying out the additional hours.
- In line with our Equal Opportunities Policy, there is no discrimination practiced on the grounds of age, disability, gender, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. We are committed to providing equal opportunities for all and promoting equality of opportunity in all aspects of employment, including recruitment, pay, promotion, the provision of training and career development, dismissal, retirement etc. We will treat all employees fairly and with dignity and we will provide a working environment free from direct and indirect discrimination, harassment or victimisation.
- No inhumane or derogatory treatment is allowed. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation are prohibited. In line with our policies, Cadogan has a zero-tolerance approach to any form of bullying or harassment within the work environment.

Suppliers/relevant third parties will:

- Accept responsibility for all and any staffing and environmental conditions under which products are made and services provided, in the spirit of the above. This includes all work contracted or sub-contracted out. In particular, suppliers should not seek to deprive employees of their legal or contractual rights.
- Assign responsibility for implementing the policy to a senior manager.

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