

WILLIAM TURNER

**Business
Ethics Policy
Statement**

June 2025

Introduction

At William Turner Ltd., we are committed to conducting our business with integrity, transparency, and respect for people, society, and the environment. We expect all employees, managers, and directors to uphold the highest standards of ethical behaviour, comply with all applicable laws, and promote a culture of accountability and fairness across every aspect of our operations.

This policy outlines the principles that guide our conduct and relationships with key stakeholders.

1. Our People

We believe that our people are our most valuable asset. We are committed to:

- Treating all employees with dignity, fairness, and respect.
- Providing equal opportunities for employment, development, and advancement—regardless of race, religion, gender, sexual orientation, gender identity, age, disability, marital or parental status, or national origin.
- Fostering a diverse, inclusive, and supportive workplace that promotes wellbeing and collaboration.
- Ensuring a safe and healthy work environment that complies with all relevant health and safety laws and best practices.
- Maintaining a zero-tolerance policy on discrimination, harassment, bullying, and any form of intimidation.

2. Our Customers

Our reputation is built on trust, quality, and long-term partnerships. We are committed to:

- Providing products and services that meet or exceed customer expectations.
- Communicating honestly and transparently, avoiding misleading claims or omissions.
- Handling all customer information with strict confidentiality and data protection standards.
- Addressing feedback and complaints with efficiency, fairness, and respect.

3. Our Suppliers & Partners

We aim to build mutually beneficial, ethical, and sustainable relationships. We are committed to:

- Selecting suppliers and partners based on integrity, quality, reliability, cost-effectiveness, and alignment with our values.
- Conducting due diligence to ensure compliance with our standards on labour rights, environmental impact, and health & safety.
- Maintaining openness and honesty in all commercial dealings, avoiding conflicts of interest, bribery, or unfair advantage.
- Supporting suppliers who demonstrate commitment to ethical sourcing and responsible business conduct.

4. Legal and Regulatory Compliance

We uphold the rule of law and regulatory integrity in every market we operate in. All employees and representatives must:

- Comply with all applicable local, national, and international laws and regulations.
- Avoid involvement in any activity that could result in corruption, fraud, bribery, tax evasion, or anti-competitive behaviour.
- Report any known or suspected legal or ethical violations to the Managing Director or through the appropriate internal reporting channels.

5. Accountability and Continuous Improvement

Ethical conduct is everyone's responsibility. We are committed to:

- Empowering employees through training, communication, and leadership example.
- Reviewing and improving our ethics policies and procedures regularly.
- Encouraging openness and providing a safe and confidential way to report concerns or unethical behaviour, without fear of retaliation.

This statement forms a core part of William Turner Ltd.'s Code of Conduct and company culture. It applies to all employees, directors, contractors, and representatives, and is supported by complementary policies such as our Anti-Bribery, Modern Slavery, Data Protection, and Sustainability policies.

Signed:

Position: Managing Director

Print Name: Bruce Freeland

Date of Issue:

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