



BUSINESS ETHICS POLICY

Author: Jo Carlin

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1. Introduction

1.1 This Business Ethics Policy applies to all employees and contractors of The Serious Sweet Co Ltd (the “Company”) and outlines how the Company will carry out its business.

2. Compliance

2.1 The company will comply fully with all relevant national and international laws and will act in accordance with local guidelines and regulations, including those which are industry specific, governing our operations.

2.2 It is the responsibility of all managers to ensure, by taking legal or other expert advice where appropriate, that they are aware of all local laws and regulations which may affect the part of the business in which they are engaged.

2.3 Even where the law does not apply, applicable standards of ethics and morality relate to our activities and require the same diligence and attention to good conduct and citizenship. Employees must avoid situations where appearance of impropriety exists, even though the circumstances might not otherwise specifically violate this code of conduct.

3. Risk Assessment

3.1 The company recognises that there are risks associated with carrying out any business activity.

3.2 The Serious Sweets Management Team is required to carry out due diligence to check the trading relationships wherever the company operates.

3.3 The Serious Sweets Management Team is responsible both for ensuring that policies and procedures are in place to manage risks and for complying with those policies and procedures.

3.4 Employees should ensure that they are aware of the risks associated with their activities and that they comply with policies and procedures in place to manage those risks.

4. Confidential Information

4.1 Employees must not make use of confidential information obtained through their employment for personal gain, nor disclose such information to any third party during or after their employment. ‘Confidential information’ is either information that has been specifically described as being confidential or is otherwise obviously confidential from the surrounding circumstances.

4.2 The term “confidential information” does not include information already in the public domain, information that was already known to the recipient at the time of its disclosure, or information that is required by law to be disclosed.

5. Conflicts of Interest

5.1 Sales of the company’s products and purchases of products and services from suppliers will be made solely on the basis of quality, performance, price and value, and never on the basis of giving or receiving inducements in the form of payments, gifts, entertainment or favours or in any other form.

5.2 Every employee has a duty to avoid business, financial or other direct or indirect interests or relationships which conflict with the interests of the company, or which divides his or her loyalty to the company. Any activity which even appears to present such a conflict must be avoided or terminated unless, after disclosure to the appropriate level of management, it is determined that the activity is not unethical or improper, does not compromise integrity and is not detrimental to the reputation and standing of the company.

6. Bribery & Corruption

6.1 Our company is resolutely opposed to bribery, kickback, extortion and corruption in whatever form it may take. Gifts or entertainment may only be offered to a third party if they are consistent with customary business practice in the relevant territory, are proportionate, modest in value (no greater monetary value than £50) and cannot be interpreted as inducements to trade. Where there is doubt, guidance should be sought from the Managing Director.

6.2 No financial or other inducements should be given to third party organisations or to individuals from such organisations in any circumstances.

6.3 Employees should not accept gifts, money or entertainment from third party organisations or individuals, where these might reasonably be considered likely to influence business transactions or be in breach of the company's own policy. Unsolicited gifts, other than trivial ones with a low value, should be returned and the General Manager notified. In a culture where such an action might cause offence, the gift should be declared to the company and, if practical, donated to an appropriate charity.

7. Accounting Standards and Records

7.1 All accounting documentation must clearly identify the true nature of business transactions, assets and liabilities in conformity with generally accepted accounting principles. No record or entry must be false, distorted, incomplete or suppressed.

8. External Reporting

8.1 Our business may be required to make statements or provide reports to regulatory bodies.

8.2 Care should be taken to ensure that such statements or reports are accurate and timely. Senior management must be made aware of any sensitive disclosure before it is made.

8.3 Care must also be taken when making statements to the media that information given is correct and not misleading. Enquiries from the media should be referred to the CEO and statements should only be made by designated spokespersons.

9. Political Contributions

9.1 The company does not make contributions to political parties.

10. Employees

10.1 Our company supports the principles of the United Nations Universal Declaration of Human Rights and is committed to upholding these principles in its policies, procedures and practices.

10.2 Respect for human rights is and will remain integral to our operations. We will respect freedom of association and the right to collective bargaining in accordance with local legislation and practice.

10.3 Employment will be freely chosen with no use of forced labour or child labour.

10.4 The Company shall only employ workers who are legally authorised to work in our location and we validate the eligibility to work status through appropriate documentation.

10.5 In dealing with our employees, we will act in compliance with national regulatory requirements and government guidelines.

10.6 We will not discriminate on grounds of race, colour, nationality, ethnic or national origin, gender, marital status, disability, religious beliefs, age, sexual orientation or part-time status.

10.7 Employees will be paid and work hours as the terms established by UK legislation

10.8 We value all our employees for their contribution to our business and their opportunities for advancement will be equal and not influenced by considerations other than their performance, ability and aptitude.

10.9 Employers' obligations to employees under labour or social security laws and regulations must be respected. The businesses and their employees will work towards creating permanent longterm relationships. To achieve a working environment in which team spirit and commitment to our goals and values are maintained, the company will ensure that individual employees are treated fairly and with dignity and respect. They will also be provided with the opportunity to develop their potential and, if appropriate, to develop their careers further with the company.

10.10 The company places the highest priority on promoting the health and safety of employees whilst at work .

10.11 The Company is committed to not using any slave, forced, bonded, indentured or involuntary prison labour. It does not engage in human trafficking or exploitation. It does not retain employees' government issued documentation, passports or work permits. The Company recognises the Modern Slavery Act 2015

10.12 The Company working hours are stated in employee contracts and are such that employees are allowed at least one day off every seven days, and overtime is voluntary.

10.14 No underage labour is involved in the production of the Company's products.

10.15 Employees are paid lawful wages and equal pay for equal work without discrimination. There are no disciplinary deductions from pay.

11. Customers

11.1 Mutual trust and confidence between the company and its customers is vital. All employees should strive to consistently deliver service excellence, meeting customers' expectations and anticipating their changing requirements.

12. Suppliers

12.1 All suppliers are entitled to fair treatment and all potential suppliers should have a reasonable opportunity to win company business. It is the company policy to pay suppliers on time in accordance with agreed terms of trade. In turn our company sets high standards for its suppliers in the context of their own ethical policy.

13. Competitors

13.1 Our company will always compete vigorously, but in a fair and ethical way.

13.2 Competitive success is built on providing good value and service excellence. Competitors should not be named, disparaged, or compared with unfavourably. When in contact with competitors, employees will avoid discussing confidential information and no attempt will be made to improperly acquire competitors' trade secrets or any other confidential information.

14. Shareholders

14.1 There are no shareholders of the company.

15. Community

15.1 The company is fully committed to supporting and assisting the community in which the company operates through a variety of means including sponsorship of community projects and charitable donations.

15.2 Our company will also serve the local community by providing good employment opportunities.



16. Environment

16.1 We will conduct our business with respect and consideration for the communities in which we operate and for the environment.

16.2 We will strive to minimise our impact on the environment in each of our operations through reduction of waste, vehicle emissions, greenhouse gas emissions, water usage and energy consumption.

17. Use of the internet

17.1 Employees are permitted to use the internet where appropriate for their job and some limited personal use is also permitted in an employee's own time. Employees should refer to the Communications Policy.

18. Harassment

18.1 Harassment can be defined as unwanted behaviour, which a person finds intimidating, upsetting, embarrassing, humiliating or offensive. Conduct involving the harassment (racial, sexual or of any other kind) of any employee is unacceptable.

18.2 Should an employee believe that he or she has been harassed; the matter should be raised with the line manager or General Manager, who will arrange for it to be investigated without delay, impartially and confidentially.

19. Staff Suggestions, Complaints and Whistleblowing

19.1 Staff can expect that the company will give due consideration to their constructive suggestions and will provide a considered and objective review of genuine concerns and complaints. Such concerns include fraud, misrepresentation, theft, harassment, discrimination and noncompliance with regulations, legislation, policies and procedures.

19.2 Concerns must be investigated impartially so that the employee's rights are protected.

19.3 Employees who have concerns about potential unethical behaviour should advise their line manager in the first instance. Employees may do this anonymously if they so wish. To ensure that confidentiality is maintained, employees should not discuss such concerns with colleagues or other third parties, unless specifically authorised or unless it is a legal requirement.

19.4 If the whistle-blower is dissatisfied with the response to the concern raised, or if the concern relates to a matter of exceptional gravity or sensitivity, then the General Manager should be informed immediately.

Endorsed By:

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Rob Whitehead
Owner

Date: Nov 2025