

Code of Ethics Policy and Guidelines

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1. About this Policy

This policy applies to all Avant Home employees including temporary or agency staff, consultants and any other third parties and formalises the ethical standards we expect of all our employees.

2. Business relationships

All employees should behave with integrity in all business relationships. We do not engage in business practices which may be considered unethical or corrupt including any form of bribery. The direct or indirect offer, payment, soliciting and acceptance of bribes in any form is unacceptable (see Anti-Bribery Policy for further details). In support of this, we are committed to take into account in our actions the laws of every jurisdiction in which we operate.

3. Objectivity

An employee should strive for objectivity in all professional and business judgements. An employee should recognise problems which may be created by financial involvement or personal relationships which, whether sanctioned by the employee's contract of employment or not, could by reason of their nature or degree threaten the employee's objectivity. Where any doubt exists, the involvement or relationship must be disclosed to the Group. It is not acceptable for any employee (or a family member) to make or seek any personal gain from the purchase of goods or services by or from the Group.

4. Confidentiality

An employee must not use, exploit, disclose or attempt to use any information relating to the Group's business which is not in the public domain or disclose information to any person who is not a member of staff or professional advisor. This applies both during and after employment with the Group. An employee must not use information obtained in the course of their employment with the Group for personal financial profit.

5. Conflicts of interest

Employees must not take or influence any decision regarding the Group's business or transactions if they or their family have any financial, personal or other interest in the other party to the transaction. For the avoidance of doubt employees must disclose to their line manager a situation where a family member is involved with a business the Avant Group is, or intends to, trade with. Employees must notify their line manager if they or their family acquire any personal interest which conflicts with the interests of the Avant Group and may be required to dispose of any such personal interest.

6. Compliance

All employees should behave with integrity in all business relationships. We do not engage in business practices which may be considered unethical or corrupt including any form of bribery. The direct or indirect offer, payment, soliciting and acceptance of bribes in any form is unacceptable (see Anti-Bribery Policy for further details). In support of this, we are committed to take into account in our actions the laws of every jurisdiction in which we operate.