

Ethics Policy

The Framework

The Company has established a set of core values which under-pins the way it conducts its business. These values are enshrined in an integrated Policy and Procedural framework which endorses and promotes the themes of Partnering, Teamwork, Customer Service, Quality, Safety, Equal Opportunities and Personal Development.

In recognising its obligations to all stakeholders (shareholders, employees, customers, suppliers, competitors and the wider community), the Company demands the highest ethical standards of behaviour and approach from all those who operate in the Company's name and actively encourages the exposure of any practices which may injure the reputation of the Company or any of its employees.

Policies, procedures, documentation and training programmes have been developed to ensure that business activities and personal conduct comply with regulatory and other legal requirements.

As part of formal Induction processes, all Staff are given an outline of the Company's core values and are given the opportunity to examine key policies and procedures geared to the maintenance of an ethical frame of reference for the business. Via the intranet, team briefings and other forms of direct communication, individuals at all levels of the organisation are made aware of the Company's Mission, targets and style of operation and the way it wishes its employees to operate on its behalf, both within the Company and externally.

The Company has created a 'Whistle-Blowing' Policy and Procedural framework and has established an environment where employees may raise genuine concerns about malpractice in connection with the business, without fear of personal penalty. The Procedure is also intended to help in the promotion, throughout the business, of a culture of openness and a shared sense of integrity.

Application Areas

Our Customers

The Company believes that integrity in its dealings with customers is essential for the development of successful and sustained business relationships. This principle governs all aspects of the Company's approach to its customers, whether they be Government agencies, private companies or members of the general public.

The Company shall strive to provide products and services which are of a consistent high quality and reliability, and shall establish customer care processes to ensure the maintenance and development of positive relationships with its customer base.

The Company shall take all reasonable care to ensure that it does not give inadequate or misleading descriptions of the products and services that it provides and in all advertising and other public communications, untruths, concealment and overstatement shall be avoided.

In line with contract of employment conditions, should individuals wish to engage in employment outside of the Company, prior permission must be sought from line management and the permission logged centrally with the Personnel Department. Equally, should staff wish to enter personal business or commercial arrangements with individuals from client or supply chain companies, then again, prior permission must be sought.

The Company shall maintain the due confidentiality of customer data and commercially sensitive information.

The Company shall take reasonable care to safeguard all assets entrusted to it by its customers in anticipation of the provision of services and take appropriate steps in its endeavours to fulfil all contractual commitments to its customers.

The market power of the Company shall not be used for unscrupulous purpose.

Our Employees

Relations with employees are based on the principle of respect for the dignity of the individual.

The Company shall recruit and promote employees on the basis of their suitability for the job without discrimination in terms of race, religion, nationality, ethnic or national origin, colour, gender, sexual orientation, age, marital status or disability.

The Company seeks to provide a reasonable level of job security for its employees and actively encourages individuals to take ownership of their personal development.

Succession, training and development plans are required for all business areas and are personally overseen and reviewed by the Chief Executive and the HR Director.

In line with its well established Health and Safety Policies and Procedures, the Company positively encourages the provision of healthy and safe working environments and encourages personal accountability and responsibility in all matters of Health and Safety, especially in respect of the avoidance of injury to themselves, their colleagues or members of the public.

In recognition of the efforts of individuals in helping to make the Company a success, the Company maintains fair, just and competitive pay and benefits frameworks, supported by policy and procedural guidelines. Pay systems seek to recognise both the contribution of individuals and the performance of the businesses in which they work.

The Company is committed to the principles embodied in the Investors in People (IIP) standard and maintains an effective company-wide, two-way employee communication structure which helps to align the interests of all members of the Miller team with the Company's Mission and core values.

Contracts of employment and procedural documentation expressly address issues which may arise over conflicts of interest, between individuals and the Company. Individuals are required to declare their interests where clashes may occur.

No employee shall give or receive money or hospitality, gift, service, benefit in kind or other favours of significant value to or from a customer or other persons who may influence a customer, which could be construed as being or being intended to be a bribe.

Employees shall ensure that any gifts or entertainments accepted from a client or supplier are disclosed to the employee's Line Manager. Where there is the possibility that a gift or entertainment may be viewed as inappropriate, either in value or in terms of commercial compromise, either for the Company or the individual, sanction must be sought from line management prior to the gift or entertainment being accepted.

Employees shall neither request nor receive products or services from either suppliers or customers unless any such products or services are paid-for by the employee at a commercially fair market value. Where any such transactions take place, line management should be informed, ahead of any commitments being given.

Information received by employees in the course of business dealings shall not be used for personal gain or for any inappropriate purpose except that for which it is expressly provided.

Employees shall treat information relating to the Company as confidential, especially in commercial terms and as required in their Contracts of Employment.

In line with its Policy outlawing Harassment in the Workplace, the Company does not and shall not tolerate any sexual, physical or mental harassment of its employees.

The Group has well defined grievance and disciplinary procedures which require resolution of issues within prescribed and reasonable time-frames.

In providing the facilities to enable employees to perform to the required standards set by the Company in financial, behavioural and ethical terms, the Company demands that employees use such facilities appropriately and a manner which is consistent with those standards. In this respect, the Company permits the reasonable use of phone, e-mail and internet facilities for the private use of its employees, provided that such use is not excessive, does not conflict with business needs, does not result in any infringement of the law and complies with relevant policies and procedures.

Where an employee has adhered to the Company's expected standards of behaviour, the Company shall provide assistance to employees, in the event that they are suspected or accused, by any third party, of a shortfall in the standards of business conduct expected of them in the course of their employment. In so doing, the employee would be expected to assist the Company by providing full explanations and prompt access to all relevant information relating to the situation.

Our Suppliers

The Company continuously strives to develop relationships with its suppliers based on its partnering approach to business and on mutual trust.

The Company endeavours to pay its suppliers promptly and according to agreed terms of trade.

All information concerning the relationship between the Company and its suppliers shall be treated with appropriate confidentiality.

Our Competitors

The Company shall not attempt to acquire information regarding a competitor's business by disreputable means.

Sponsorships and Charitable Giving

Individuals shall not commit company monies to sponsorship or charitable-support activities to organisations in which they have a direct or associate vested interest (involving, for example, a school governorship, directorship or fund-raiser status within the receiving organisation), without declaring same and securing sanction from the Chief Executive.

Company sponsorships and charitable gifts at corporate level shall be determined by the Chief Executive.

Company sponsorships and charitable gifts of £5,000 or more require the specific sanction of the Chief Executive.

Chris Endsor
Chief Executive
1st January 2016