**1. Purpose**

The purpose of this policy is to outline the ethical standards that guide the behaviour and decision-making of all individuals working for or on behalf of NWF Facilities Ltd. This includes our commitment to legal compliance, integrity, fairness, and sustainability—including active support for climate change mitigation and socially responsible business practices.

**2. Scope**

This policy applies to all employees, directors, contractors, agency workers, suppliers, and third parties associated with NWF Facilities Ltd. It covers all areas of business activity, including client relationships, procurement, marketing, service delivery, recruitment, and environmental performance.

**3. Policy Statement**

NWF Facilities Ltd is committed to conducting business with the highest standards of ethics, professionalism, and accountability. Our core ethical values include:

* **Integrity:** Being honest, transparent, and trustworthy in all dealings
* **Respect:** Valuing diversity, inclusion, and the rights of all stakeholders
* **Responsibility:** Taking ownership of our actions, including their environmental and social impact
* **Sustainability:** Acting in ways that protect people, communities, and the planet
* **Compliance:** Adhering to all relevant legislation, standards, and codes of conduct

**4. Key Principles of Ethical Conduct**

All representatives of NWF Facilities Ltd must:

* Comply with all applicable laws, regulations, and internal policies
* Act honestly and avoid conflicts of interest
* Maintain confidentiality and protect data in accordance with UK GDPR
* Treat colleagues, clients, suppliers, and the public with dignity and fairness
* Avoid bribery, fraud, or corruption in any form
* Promote and uphold the company’s sustainability goals, including our commitment to reduce emissions and mitigate climate change
* Only represent the company with authority and in accordance with internal approval procedures

**5. Ethical Procurement and Supply Chain**

NWF Facilities Ltd is committed to sourcing goods and services ethically. We will:

* Engage with suppliers who demonstrate fair labour practices, diversity, and environmental responsibility
* Reject suppliers or partners who violate human rights, environmental regulations, or anti-bribery standards
* Prioritise sustainable and low-carbon products and services
* Monitor supply chain risks, including climate and social impacts

**6. Climate Change and Ethical Responsibility**

Ethical business conduct includes considering the long-term environmental impact of our decisions. NWF Facilities Ltd:

* Integrates climate change considerations into all business planning and risk management
* Encourages low-carbon practices, waste reduction, and energy efficiency across all operations
* Educates employees on environmental ethics and sustainable decision-making
* Publishes climate and ESG performance transparently where appropriate

**7. Responsibilities**

* **Directors and Senior Management:** Lead by example, promote ethical behaviour, and ensure systems are in place to support compliance
* **Managers and Supervisors:** Guide teams, resolve ethical dilemmas, and address misconduct
* **Employees and Representatives:** Understand and follow the policy, raise concerns, and maintain high ethical standards in all work
* **Relevant Manager/Compliance Officer:** Oversee training, monitor conduct, and investigate breaches

**8. Reporting and Whistleblowing**

Employees are encouraged to report any concerns about unethical behaviour or policy breaches. Reports can be made to:

* The relevant line manager or director
* A designated compliance or HR officer
* Via the company’s formal whistleblowing procedure (confidentially and without retaliation)

All concerns will be taken seriously and investigated promptly.

**9. Training and Awareness**

* All staff will receive induction training on business ethics and expected conduct
* Refresher training will be provided annually
* Additional training will be delivered for staff in high-risk roles (e.g. procurement, finance, compliance)

**10. Monitoring and Review**

This policy will be reviewed annually or:

* Following a significant ethical incident
* In response to changes in legislation, standards, or company operations
* As part of wider ISO or SSIP compliance assessments

**Signed:**  
[Director’s Name]  
Managing Director  
NWF Facilities Ltd  
**Date:** 01.02.2025