

# Ethics Policy



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# Modern Slavery Policy

## Modern Slavery

Modern Slavery is a term used to encapsulate offences in the Modern Slavery Act 2015 and takes various forms such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Businesses must be alert to the risks of modern slavery not only ensuring there are appropriate working conditions within their own business but also satisfying themselves that there is no modern slavery within its supply chain, plus taking appropriate action where necessary. Zentura Ltd T/A The Hansbury Group (the "Company") has a zero-tolerance approach to modern slavery of any kind within its business and its supply chains. We seek to enforce this ethos within every aspect of the business, including its supply chains, and will take the necessary steps should any member of staff or any of its suppliers act to the contrary.

Through identifying key risk and adopting measure to combat such, we are confident, as far as possible, that there are and will continue to be sufficient steps in place to discourage and deter modern slavery within its own business and that of its suppliers. The Company's policies reflect its commitment to acting ethically and with integrity in all its business relationships. Where necessary the Company will look to further strengthen controls throughout its business and wider supply chain and seek to develop its policies in this area in line with best practice and continuous improvement principles.

This Policy is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Zentura Ltd T/A The Hansbury Group's Modern Slavery Policy for the current financial year.

## Our Organisation

Zentura Ltd T/A The Hansbury Group is an Office Fit-out company who carry out refurbishments, fit-outs and furniture supply in commercial office spaces, primarily in London. For most projects, we are the Principal Contractor and Principal Designer in accordance with CDM regulations. We have strong partnerships with our Customers, Employees, Suppliers, and Investors.

## Risk & Exposure

The Company is exposed to a relatively low level of risk with regards to modern slavery within its own business. However, the Company is committed to identifying such risk and putting in place appropriate control measures.

A greater risk is the potential for modern slavery within the Company's supply chains. Below outlines the risk and exposures identified by us and the mitigation measures put in place in relation to the Company's staff and to its suppliers.

## Our Staff

Zentura Ltd T/A The Hansbury Group promotes a healthy working environment. The health and safety of staff is the Company's top priority. Their wellbeing and commitment is critical to the Company's success. Every member of staff has the right to feel safe at work and to get home safely at the end of each working day.

All staff are paid at least the national minimum wage and the Company complies with its obligations under the Working Time Regulations. All employees must adhere to the Company's

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Code of Conduct which is made up of number of policies including Bullying and Harassment Policy, Disciplinary Policy, Equal Opportunities Policy and Grievance Policy.

The Company operates all sites with competent management teams to ensure optimum control of the work environment. To ensure a high level of understanding of the risks of modern slavery in its business, the Company will be implementing training to all senior members of staff and the Procurement teams.

## Suppliers

We have identified the Company's supply chain as its most significant risk in relation to modern slavery. This includes service providers such as sub-contractors.

Where possible the Company builds long-standing relationships with suppliers and makes clear its expectations of business behaviour. The Company will report any type of supplier to the relevant authorities where it considers necessary to do so.

We expect all suppliers, and suppliers within their own supply chain, to take the same anti-slavery and human trafficking stance as the Company and, where required by law, to produce an Annual Modern Slavery Policy pursuant to section 54(1) of the Modern Slavery Act 2015.

As a minimum, the Company expects its suppliers to apply the following standards within their own business and take reasonable steps to ensure the same is adhered to within their own supply chains:

- Employment is freely chosen.
- Working Conditions are safe and hygienic.
- Child labour is not used.
- Minimum wage is paid (at least).
- No discrimination is practiced.
- No harsh or inhumane treatment.
- No Corporal punishment, withholding of wages of work carried out, mental or physical coercion or verbal abuse.
- Compliance with all applicable laws and respecting human rights.

Where the Company considers a supplier has failed to comply with any of the above, the Company will undertake an automatic review of the supplier's contract with the Company including consideration of action for a potential breach, including termination.

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# Diversity & Inclusion At The Hansbury Group

At The Hansbury Group, we recognise the importance of diversity and inclusion. We operate in increasingly diverse communities both in the UK and internationally and this diversity is evident in our workforce and our customers, suppliers, and other stakeholders.

In our increasingly competitive business environment, we understand that the performance and engagement of our employees is central to business success. We are committed to creating an inclusive working environment, in which each employee is able to fulfil their potential and maximise their contribution. We recognise and value the creative potential that individuals of different backgrounds and abilities bring to their work.

Our employment policies and practices reflect a culture where decisions are made solely on the basis of individual capability and potential in relation to the needs of the business. Protected characteristics covered by legislation are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including ethnic origins, nationality, and colour), religion or belief, sex and sexual orientation. In addition, other personal factors such as part time and fixed term status provide no basis for less favourable treatment. Discrimination, bullying or harassment will not be tolerated.

We also recognise the value of a diverse workforce in helping us understand the needs of our large and diverse customer base and that this can help ensure we tailor our products and services accordingly, support sales growth and customer retention.

All our employees are responsible for ensuring that the diversity policies are actively implemented and should be aware of their personal responsibility to each other, customers, contractors, suppliers, and visitors. The effectiveness of our policies will be monitored and evaluated on a regular basis.

## Our Organisation

Zentura Ltd T/A The Hansbury Group is an office interiors company who carry out office refurbishments, fit outs and furniture supply in commercial office spaces across the UK. For most projects, we are the Principal Contractor and Principal Designer in accordance with CDM regulations. We have strong partnerships with our Customers, Employees, Suppliers, and Investors.

## Policy Scope

This policy applies to all employees of The Hansbury Group.

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# Policy Application

We are committed to a positive policy of promoting equality of opportunity, providing an inclusive workplace, and eliminating any unfair or unlawful discrimination. This applies to all employment policies and practices including those relating to:

- Recruitment and selection.
- Terms and conditions of employment.
- Working environment.
- Training and development.
- Promotion and career progression.
- Redundancy and re-deployment.

We are committed to ensuring diversity and inclusion in the workplace and want to ensure this policy is applied in all areas of our business. This policy is supported by appropriate harassment, disciplinary and grievance procedures.

Within our businesses there are procedures available to any employee who believes that he or she may have been unfairly discriminated against. Our employees will not be victimised in any way for making such a complaint in good faith. We will deal with complaints seriously, in confidence and as soon as possible.

Disciplinary action will be taken against any employee who is found to have committed an act of unlawful discrimination. Serious breaches of the policy will be treated as gross misconduct. [Allegations of discrimination which are not made in good faith will also be treated as a disciplinary matter.] Confidential records of ongoing matters dealt with in accordance with this policy will be kept.

## Diversity Practices

Our employees are made aware of the Diversity & Inclusion policy during their employment, in appropriate ways, including but not limited to:

- During recruitment and induction.
- Training and development programmes.
- Employee communications material.

The Hansbury Group provides an inclusive working environment. We offer:

- Flexible working arrangements.
- Carers leave, career breaks and leave of absences.
- Employee education assistance.
- Flexible Benefits
- Mentoring
- Employee Assistance Programs – including family counselling, and childcare and elder care assistance.

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# Employee's Responsibilities

Our employees are responsible for the practical application of the Diversity & Inclusion Policy, which extends to the treatment of job applicants, employees, customers, contractors, suppliers and visitors.

Our employees have a PERSONAL RESPONSIBILITY to advise their Line Managers, Human Resources Managers or to follow the grievance procedures if there is a belief that any discrimination has occurred. Any act by an employee to encourage a colleague to discriminate against another either in language or behaviour may be deemed to be an act of inciting another to discriminate or aiding and abetting that act of discrimination and we will take this very seriously.

Special responsibility for the practical application of our approach to Diversity & Inclusion falls upon our Managers, Supervisors and Human Resources Managers involved in day-to-day supervision and management of employees and of recruitment, selection, promotion, and training of employees.

Our managers have A PERSONAL RESPONSIBILITY for ensuring that this policy is communicated, understood, and applied within their own areas. Any queries in the application or interpretation of this policy should be discussed with Human Resources, prior to any action being taken.

HR have the responsibility to ensure maintenance, review and updating of this policy. Revisions, amendments, and alterations of this policy will only be implemented following consideration and approval by the Group HR Policy Manager.

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# Anti-Corruption

## Policy Purpose

This anti-bribery policy exists to set out the responsibilities of Zentura Ltd T/a The Hansbury Group and those who work for us in regards to observing and upholding our zero-tolerance position on bribery and corruption.

It also exists to act as a source of information and guidance for those working for Zentura Ltd T/a The Hansbury Group. It helps them recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

## Policy Statement

Zentura Ltd T/a The Hansbury Group is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented. Zentura Ltd T/a The Hansbury Group has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the country we operate.

Zentura Ltd T/a The Hansbury Group will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, in regards to our conduct both at home and abroad.

Zentura Ltd T/a The Hansbury Group recognises that bribery and corruption are punishable by up to ten years of imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business and take our legal responsibilities seriously.

## Policy Coverage

This anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located (within or outside of the UK). The policy also applies to Officers, Trustees, Board, and/or Committee members at any level.

In the context of this policy, third-party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

Any arrangements our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.



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# Bribery Guidelines

## Definition of Bribery

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.

A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.

Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the company's compliance manager.

## What is and is Not Acceptable

This section of the policy refers to 4 areas:

- Gifts and hospitality.
- Facilitation payments.
- Political contributions.
- Charitable contributions.

### Gifts and hospitality

Zentura Ltd T/a The Hansbury Group accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.

1. It is not made with the suggestion that a return favour is expected.
2. It is in compliance with local law.
3. It is given in the name of the company, not in an individual's name.
4. It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
5. It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
6. It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
7. It is given/received openly, not secretly.
8. It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
9. It is not above a certain excessive value, as pre-determined by the company's compliance manager (usually in excess of £100).
10. It is not offer to, or accepted from, a government official or representative or politician or political party, without the prior approval of the company's compliance manager.

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### Cultural Sensitivity

Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the compliance manager, who will assess the circumstances.

Zentura Ltd T/a The Hansbury Group recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.

### Disclosure

As good practice, gifts given and received should always be disclosed to the compliance manager. Gifts from suppliers should always be disclosed.

The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the compliance manager should be sought.

### Facilitation Payments and Kickbacks

Zentura Ltd T/a The Hansbury Group does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We recognise that they tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action.

Zentura Ltd T/a The Hansbury Group does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

Zentura Ltd T/a The Hansbury Group recognises that, despite our strict policy on facilitation payments and kickbacks, employees may face a situation where avoiding a facilitation payment or kickback may put their/their family's personal security at risk. Under these circumstances, the following steps must be taken:

- Keep any amount to the minimum.
- Ask for a receipt, detailing the amount and reason for the payment.
- Create a record concerning the payment.
- Report this incident to your line manager.

### Political Contributions

Zentura Ltd T/a The Hansbury Group will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

### Charitable Contributions

Zentura Ltd T/a The Hansbury Group accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.

Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the compliance manager.

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# Employee Responsibilities

As an employee of Zentura Ltd T/a The Hansbury Group, you must ensure that you read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are given.

All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the compliance manager.

If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. Zentura Ltd T/a The Hansbury Group has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

## Concern Procedure

This section of the policy covers 3 areas:

- How to raise a concern.
- What to do if you are a victim of bribery or corruption.
- Protection.

### How to Raise a Concern

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to Zentura Ltd T/a The Hansbury Group, you are encouraged to raise your concerns at as early a stage as possible. If you're uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to your line manager, the compliance manager, the director, or the Head of Governance and Legal.

Zentura Ltd T/a The Hansbury Group will familiarise all employees with its whistleblowing procedures so employees can vocalise their concerns swiftly and confidentially.

### What to do if You are a Victim of Bribery or Corruption.

You must tell your compliance manager as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.

### Protection

If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, Zentura Ltd T/a The Hansbury Group understands that you may feel

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worried about potential repercussions. Zentura Ltd T/a The Hansbury Group will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

Zentura Ltd T/a The Hansbury Group will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

Detrimental treatment refers to dismissal, disciplinary action, treats, or unfavourable treatment in relation to the concern the individual raised.

If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform your line manager or the compliance manager immediately.

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# Thank You The Hansbury Group

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CREATING WORKSPACES PEOPLE LOVE

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