Halo Benefits

POLICY

Code of Conduct and Business Ethics

The standards of behaviour we expect from everyone who works here.

UPDATED	VERSION	NEXT REVIEW
23 November 2026	2.0	November 2027

Halo Benefits Ltd · Owner: Dionne Clarke, Head of People & Partnerships · Classification: Internal & Public

Document control

Policy owner	Dionne Clarke, Head of People & Partnerships
Approved by	Board of Directors
Date approved	23rd November 2026
Next Review Date	23th November 2027
Review frequency	Annually
Applies to	All directors, employees, contractors and consultants of Halo Benefits Ltd
Related policies	Anti-Bribery and Corruption Policy, Conflicts of Interest Policy, Whistleblowing Policy, Supplier Code of Conduct

Version history

Version	Date	Summary of changes	Author
1.0	30 Oct 2026	First issue	Dionne Clarke
2.0	23 Nov 2026	Rebranded and restructured for clarity and readability	Dionne Clarke

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1. Purpose of the Code

This Code sets out the standards of behaviour we expect from everyone who works for Halo Benefits Ltd, and is the foundation for our more detailed policies. Our customers trust us with their employee benefit arrangements and their people's personal data, and this Code explains how we keep that trust.

2. Scope

This Code applies to **Halo Benefits Ltd** (company number 17577358) and to all directors, employees, contractors and consultants, wherever they work. We expect our suppliers and partners to meet equivalent standards, as set out in our Supplier Code of Conduct.

3. Integrity and honesty

- Be honest and accurate in everything you say and write, including sales materials, proposals, timesheets and expense claims.
- Never make claims about our products, certifications or performance that we cannot support.
- Keep accurate records, and never falsify or hide information.
- Comply with the law wherever we operate.

4. Confidentiality and data protection

- Protect confidential information belonging to us, our customers and our suppliers. Use it only for its intended purpose and share it only with people who need it and are entitled to see it.
- Confidentiality obligations continue after you leave, and you must never bring confidential information from a previous employer.
- Handle personal data in line with UK GDPR, the Data Protection Act 2018 and our data protection and security policies: collect only what is needed, keep it only as long as necessary and store it only in approved systems.
- Use multi-factor authentication, keep devices updated and encrypted, and never share passwords.
- Report any suspected data breach or security incident immediately to security@halobenefits.co.uk.

5. Fair dealing and competition

- Deal fairly with customers, suppliers and competitors, and never mislead or take unfair advantage of anyone.
- Choose suppliers on merit, value and ethical standards.
- We compete fairly and comply with the Competition Act 1998. Never agree or discuss prices, bids, salaries, customers or territories with competitors, agree with other employers not to recruit each other's staff or to fix pay, or share commercially sensitive information with competitors.
- If a competitor raises any of these topics, stop the conversation, make clear you will not take part and report it to a director.

6. Bribery, fraud, conflicts and sanctions

- Never offer, give, request or accept a bribe, and follow the gifts and hospitality limits in our Anti-Bribery and Corruption Policy.
- Follow our Anti-Fraud, Anti-Money Laundering, Sanctions and Tax Evasion Prevention Policy, including our payment controls.
- Declare any conflict of interest under our Conflicts of Interest Policy.
- Comply with UK sanctions and never deal with any sanctioned person or country.

7. Respect, equality and safety

- Treat everyone with dignity and respect. Harassment, bullying and discrimination are not tolerated.
- Follow our Equality, Diversity and Inclusion Policy and our Health and Safety Policy.
- Look after your own wellbeing and that of your colleagues, and raise concerns early.

8. Public statements and company assets

- Only authorised people may speak on behalf of Halo Benefits to the media or in public.
- When posting personally, make clear your views are your own, and never share confidential information, customer names (unless publicly agreed) or personal data.
- Never enter confidential or personal data into AI tools that have not been approved for that purpose.

- Use company equipment, systems, accounts and money responsibly and for legitimate business purposes. Limited personal use of equipment is acceptable if it does not affect work, breach policy or create a security risk.
- Help us reduce our environmental impact in line with our Environmental Policy, for example by avoiding unnecessary travel and disposing of equipment responsibly.

9. Roles and acknowledgement

- **Board of Directors:** sets the tone from the top and monitors compliance with this Code.
- **Ethics Director:** a designated director who answers questions about the Code and handles concerns.
- **Managers:** lead by example, make sure their teams understand the Code and act on concerns.
- **Everyone:** reads, follows and upholds the Code, and speaks up.

Everyone confirms that they have read, understood and will follow this Code when they join and again every year. Completion is tracked and reported to the Board.

10. Speaking up and breaches

If you are unsure what to do, ask yourself whether the action is legal, consistent with this Code and something you would be comfortable seeing reported publicly. If in doubt, ask the Ethics Director or email **compliance@halobenefits.co.uk**.

Concerns can be raised with your manager, the Ethics Director, compliance@halobenefits.co.uk or under our Whistleblowing Policy. We will not tolerate retaliation against anyone who raises a concern in good faith.

Breaches of this Code may lead to disciplinary action up to and including dismissal, the ending of contracts and, where appropriate, referral to the authorities.

11. Review

This Code is reviewed annually, and sooner after any significant change in the law or our business. The Head of People & Partnerships proposes changes and the Board of Directors approves them.

> **QUESTIONS ABOUT THIS POLICY?**
> Contact Dionne Clarke, Head of People & Partnerships, at dionne@halobenefits.co.uk.