

Code of Conduct Policy Statement

As a leading childcare provider, we insist on upholding the highest standards and ethics at every level of our business. We are committed to always acting with integrity and honesty, to maintain and protect our reputation.

The Busy Bees vision is to give every child the best start in life, underpinned by our values of "Care, Quality, Service and Value". Our commitment to these values is reflected in this Code of Conduct (Code), with the Code providing a guide to help us make the right decisions at work. This includes Speaking Up if we observe conduct that is of concern, or that appears to violate the Code or be unethical in some way.

The principles set out in this Code are not exhaustive but set out a minimum standard of behaviour. It is supported by more detailed policies referred to throughout this Code, and periodic training, the frequency of which will depend on your role within our business. It does not matter where we work or what we do for Busy Bees - we all have a responsibility to use good judgment, follow our Code and always do the right thing.

We have an obligation to operate to the highest standards in everything we do. This Code sets out the expectations and behaviours expected from all colleagues. You must always operate fairly and ethically in all areas of the business to maintain our reputation and status as a global leader.

This Code will be reviewed annually and any necessary and appropriate revisions will be made and issued to you.

Our Vision

To give every child the best start in life.

Our Mission

Deliver high quality childcare and exciting opportunities for learning that give every child a head start as they prepare for school.

Our Values

- Care** We take care of children entrusted to us and our dedicated staff. All are appreciated and diversity is valued
- Quality** We maintain the highest standards in care and safety and provide exceptional early years education
- Service** We provide exceptional service and are integral to supporting parents bringing up children
- Value** We provide outstanding value for our families



1. Integrity and Honesty

The reputation of our business can only be maintained if we act with honesty and integrity when representing Busy Bees. All our relationships must be based on mutual trust and respect, and we must demonstrate honesty and a commitment to live by our values in every interaction we have with the children we care for and their families, colleagues, suppliers, other business partners and government departments.

2. Workplace

Respect in the workplace - we are all expected to respect our colleagues in accordance with our applicable People / HR policies. We:

- will not tolerate any form of harassment, bullying or victimisation;
- do not discriminate on the grounds of age, ethnicity, gender, sexual orientation, religion or any other characteristic recognised by law; and
- uphold and promote equality, diversity and inclusion.

Professionalism in the workplace - we are all expected to act professionally and show integrity in the workplace. **We must:**

- strive to provide exceptional service to achieve our mission of delivering high quality childcare to our families;
- aim to continuously improve the care and support of our children through on-going professional development;
- attend work as required and on time, unless absent with reasonable cause in accordance with applicable HR policies;
- ensure our appearance is appropriate for our area of work;
- not attend work or perform any work tasks if we are under the influence of alcohol or drugs;

- not attend work if we have symptoms of or have tested positive for a contagious disease (including a reportable disease) and must comply with all relevant internal policies and applicable laws to protect the health of everyone we work with and care for;
- all be friendly and collaborative at work and communicate in an open and effective way, to create a positive workplace environment and to promote the health, safety and wellbeing of those we work with; and
- follow our Health and Safety policies and procedures in order for us to operate safely and legally.

3. Social Media

Social media can bring significant benefits to Busy Bees for building relationships with current and potential families, but it is imperative that colleagues do not expose themselves to criticism or bring their professionalism, or that of Busy Bees', into question by posting inappropriate comments or photos on any social media platform. Viewing or distributing inappropriate content (such as pornography, sexually explicit content, racial or religious slurs or illegal content) is not acceptable in any circumstances. We must follow the rules set out in our applicable Internet Usage policies, but as a general rule, we must not:

- take part in any activities that could bring Busy Bees into disrepute or damage its reputation;
- share personal, private or confidential information relating to our team members, families or the business;
- create, view, download, distribute or post any inappropriate content; or
- post pictures of other team members, children or parents without the appropriate permission.

4. Protection of Busy Bees Assets

We should treat Busy Bees property and the property of our families, suppliers, and other business partners, whether material or intangible, with respect and care.

Confidential Information – any information acquired whilst performing duties for Busy Bees should be used only for business purposes and should not be disclosed to anyone outside of Busy Bees (including family). Even within Busy Bees, only those individuals who truly need to know the information to carry out their role should have access to confidential information. If you leave Busy Bees, you must return all company materials and property. Confidential information includes things such as child or family information, business and marketing plans, internal company communications, information on proposed acquisitions or developments and financial and legal information about our business.

Busy Bees Property - we should:

- not misuse any Busy Bees property, in particular:
 - for a non-business related activity or for personal gain; or
 - illegal or unethical activity,
- seek permission before using Busy Bees property for personal use, and only seek that permission where the use will be legal and ethical and will not interfere with our role at Busy Bees;
- protect company facilities and equipment from damage and vandalism, whenever possible. We do not lend, sell or give equipment away unless we have express permission to do so; and
- respect all intangible property (often referred to as our Intellectual Property). This includes our branding, trademarks, copyright and other property (information, reports etc.), and we should remember that Busy Bees owns any work product (such as ideas, processes or procedures) that we develop or design in our role with the business.

Record Keeping – where our role involves reporting we will act honestly and with integrity. We will always provide full, fair, accurate and understandable reports in a timely manner and be aware of the legal obligations of accurate reporting where applicable.

Investigations – We will cooperate fully with any authorised internal or external investigation. We must never withhold information that raises ethical questions and/or information that should be brought to the attention of those more senior than us or that should be disclosed to applicable regulatory authorities. Records should be retained in accordance with relevant internal policies and in accordance with all applicable laws. We will not destroy or dispose of information that might be needed for an investigation, an audit or a legal proceeding.

5. Acting Fairly, Legally and Ethically

Compliance with laws and policies – we respect the law and are committed to complying with all laws and regulations applicable to our business in every country in which we operate. We will not knowingly participate in any illegal or unethical activity and will follow this Code and all other global and local policies that are applicable to our role at Busy Bees.

Conflicts of Interest – we must avoid conflicts of interest. A conflict of interest exists when a personal interest or activity interferes or appears to interfere with our role at Busy Bees. Even the appearance of a conflict is inappropriate and can damage our reputation.

A conflict of interest is likely to arise if we:

- or a close family member have an interest in a business that is a competitor, supplier, or otherwise does business with Busy Bees; or
- engage in outside activity that prevents us from performing our role at Busy Bees.

Where any such conflict arises, we must make full disclosure to our line manager, who will then determine the appropriate steps to take together with senior management where necessary.

Bribery and Corruption – we will not accept bribery and corruption in any aspects of our business dealings and relationships, wherever we operate. All forms of bribery and corruption are strictly prohibited as set out in the Group's Anti Bribery and Corruption policy.

Improper Gifts – the giving and receiving of gifts and hospitality is nothing new in business. It is a traditional way to express gratitude and build relationships. An extravagant gift or hospitality can, however, affect or appear to affect the objectivity of the recipient when making business related decisions. We appreciate it can be difficult to tell when a gift or hospitality is inappropriate, with laws and practices differing from country to country. Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers) or be given in secret. We acknowledge that educators may receive gifts from families to show appreciation for the care we have provided. These gifts should be refused if they breach this Code or are excessive.

Fair dealing – we will always compete fairly and ethically for business opportunities. We will not:

- make deals with competitors about how we compete, including arrangements on matters such as pricing;
- discuss or exchange information with competitors (or potential competitors) about topics such as pricing, costs, business plans or marketing strategies;
- seek information on our competitors in an unethical or unlawful way. Whilst seeking information about our competitors is a normal business practice, we will do this properly, using public or other permitted sources; and
- make any false or misleading statements to win business. We will be truthful about our business and will not make claims we cannot substantiate – we will also not make inaccurate remarks about our competitors or misleading comparisons between their services and ours.

Facilitation of tax evasion – we will never knowingly take steps or be involved in the unlawful evasion of tax by another person or the business. We will not:

- provide false information, or include information, in any documents, or structure processes in such a way, so as to facilitate the evasion of tax;
- encourage anyone to commit (or continue to commit) tax evasion; or
- work, or continue to work, with any person or business who we know or suspect of committing tax evasion.

Fraud – Fraud is any activity that relies on deception in order to achieve a gain, avoid an obligation or cause a loss to another person.

We are all responsible for the detection and prevention of fraud. We will not:

- take or misuse company funds or assets for personal benefit including misuse of company credit cards;
- provide false information, or conceal the truth, with a view to personal gain or gain for another (for example by falsely claiming overtime);
- assist others (internally or externally) to commit fraud, such as by enrolling our children or our friends of family without charging the correct fees, or signing false documents; or
- abuse our position of trust.

We will investigate all instances of actual, attempted and suspected fraud committed.

Data Privacy – we take our responsibility and obligations to only collect, use and process the personal information of the children we care for, their families, our colleagues and other relevant business partners for proper and legitimate purposes very seriously.

We understand that many of us will work with personal information (including sensitive personal information) in our roles at Busy Bees and appreciate where we do, we must protect this information from

loss, misuse or unauthorised disclosure. Personal information we work with will include child data (including information on medical and special educational needs), family data, email addresses, staff data, credit card information and financial information. We only use such data for its intended purpose and only share it where it's needed and with those authorised to receive it. We will comply with all applicable data privacy laws and regulations and follow all internal policies and procedures when working with personal information.

Modern Slavery - as set out in our Global Modern Slavery Policy, we will always treat people in our business, and our supply chain, fairly. We will not tolerate slavery, servitude, bonded, forced or compulsory labour in the manufacture of products we use and will not accept products or services from suppliers who employ or utilise slavery in any manner.

Our responsibilities under the Code - We must read, understand and comply with this Code. We are required to avoid any activity that might lead to, or suggest, a breach of this Code. We must notify our line manager or make a report in accordance with our Speak Up policy if we believe or suspect that a conflict with this Code has occurred or may occur in the future. If we suspect that a breach of this Code has occurred or may occur, we must notify our line manager or report it in accordance with our Speak Up policy as soon as possible. As set out in our Speak Up policy, we aim to encourage openness and will support anyone who raises genuine concerns in good faith under this Code, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment because of reporting in good faith their suspicion that an actual or potential breach of this Code has taken place or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.