



Code of Conduct

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# INTRODUCTION

FDM is committed to acting ethically and with integrity in all its business dealings. Our reputation is crucial to our success, and FDM employees are expected to perform with honesty, professionalism and integrity at all times in the course of their work. We believe that “doing the right thing is always the right thing to do” and our core set of values provide the foundations of who we are and what we are committed to as a team.

The Directors regularly consider the impact of the Group and its business on FDM’s stakeholders including employees, contractors, customers, suppliers, investors and the wider community. The Board ensures that the decisions made are responsible and ethical by taking into consideration the wider society external to the organisation. The Group is committed to contributing to a sustainable environment and to enhancing the community in which we operate as a business.



All FDM employees support the Group's purpose, which is creating and inspiring exciting careers that shape our digital future.

## PURPOSE AND VALUES

All FDM employees support the Group's purpose, which is to create and inspire exciting careers that shape our digital future.

**Ambition** – We set ourselves challenging goals and are determined to achieve them

**Collaboration** – We work best when we work together

**Energy** – We thrive on activity and getting things done

**Inclusivity** – We embrace and bring together the best people with diverse backgrounds and experiences

**Professionalism** – We work to high standards

**Growth** – We like to be challenged and have a willingness to learn, innovate and improve

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## EMPLOYEE COMMITMENT

We expect the highest levels of personal conduct from everyone within FDM, regardless of position. Honesty, integrity, respect and fairness form the cornerstones of relationships inside and outside of the Group. In addition all employees are required to avoid any conflicts of interest between their personal activities and the business of FDM Group.

Everyone is required to make proper use of Company assets. Fraud and theft of any sort are unacceptable, and we treat any incidences seriously. Prevention of fraud and theft is the responsibility of all employees; everyone is encouraged to promote an environment that is committed to an anti-fraud culture by our actions.

We recognise that the success of the business is dependent on maintaining a positive corporate culture at all levels of the organisation. Throughout the Group, managers provide guidance, coordination and awareness of key initiatives, enabling colleagues with similar interests or backgrounds to collaborate and take part in workshops, conferences, mentorship and local activities

## DIVERSITY AND INCLUSION IN THE WORKPLACE

## PEOPLE WITH DISABILITIES

## OUR COMMUNITY

The Group's workforce is made up of around 75 nationalities working together and is dedicated to promoting a diverse workforce that reflects wider society. There is zero tolerance towards discrimination throughout all our business activities whether it relates to race, nationality, religion, disability, gender, age, sexual orientation or any other such form of discrimination where an individual may feel marginalised. It is this diversity that forms the foundation of the FDM culture and drives the business forward.

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The Group gives full and fair consideration to the employment of people with disabilities. If a member of our staff becomes disabled, we make every effort to ensure that their employment within the Group can continue, either in their existing role or in a suitable alternative. The Group endeavours to make any reasonable adjustments to enable disabled employees to fulfil the responsibilities of their job role. It is the Group's policy to support disabled employees in all aspects of their training, development and promotion where it benefits the employee and the Group.

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FDM believes that we have a responsibility to contribute towards the local community and wider society and actively encourages individual and collective initiatives to support this. The Group carries out regular fundraising events globally to raise money for charities that tie in with our purpose as well as charities which are chosen by our employees.

## SUPPORTING EX-FORCES PERSONNEL

## GETTING BACK TO BUSINESS

## CHAMPIONING WOMEN IN TECH

The dedicated Ex-Forces Programme operated by FDM in the UK and USA has demonstrated the Group's support of ex-Forces personnel through the offering of IT and business careers. FDM has formed robust partnerships with military organisations and continues to strengthen our affiliations in order to attract the best talent. We are proud to be assisting military personnel transition into civilian careers and believe that this supports both our vision and our inclusive culture.

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FDM's 'Returners to Work' programme runs out of the UK, Hong Kong and Singapore. The programme is designed specifically to provide employment opportunities for high-calibre individuals who have taken an extended break in their career, facilitating their re-entry into the workplace. FDM's programme identifies and re-skills talented people in IT and business specialities, preparing them to work onsite with clients. This assists clients in diversifying their workforce, tapping into a rich pool of talented professionals with existing experience in business.

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FDM's global Women in IT initiative aims to identify role models, break barriers and promote gender parity in the workplace. We host various events to encourage women to consider a career in IT (both in-house and at universities) and FDM Female Champions act as role models to all women in the business. FDM takes part in judging awards, networking events and speaker panels, as well as hosting the annual "FDM Everywoman in Technology Awards", which celebrate and promote outstanding women in the industry.



We are committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards in accordance with our Group Staff Handbook.



## ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

FDM is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of the business. It has considered the degree of risk that modern slavery could arise within the organisation or in supply chains. The nature of FDM's business and the direct relationship it has with applicants to the training programmes means that the risk of modern slavery in our own organisation is low. FDM has reviewed supply chains and taken a number of steps to address the potential risks of modern slavery and human trafficking.

The Group has put in place an Anti-Slavery and Human Trafficking policy to assist it in mitigating this risk, and is undertaking a process of due diligence on key suppliers. There is a pre-contract due diligence process, used with new suppliers to ensure that they confirm their commitment to comply with policies and values, or that they have in place appropriate equivalent policies of their own. FDM has also developed a set of standard contractual clauses for inclusion in supplier contracts which reinforces this approach. The Group aims to promote a high level of understanding of the risks of modern slavery and familiarise all staff with these policies on induction. Additional training may be provided to key staff members where appropriate. The effectiveness of these steps is monitored.

## WHISTLE- BLOWING

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We are committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards in accordance with our Group Staff Handbook. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

FDM has a robust whistle-blowing policy which enables our employees, officers, consultants, contractors, casual workers, agency staff, interns and volunteers to report concerns on matters affecting the Group or their employment/engagement, without fear of recrimination. The policy is reviewed annually by the Audit Committee of the Board to ensure that it remains effective.

## HEALTH AND SAFETY

The health, safety and wellbeing of our employees and visitors is an essential part of who we are. We aim to protect our people through the highest procedural standards, robust management practices, regular Board and H&S Committee review and employee training and awareness. These include providing a safe working environment, preventing accidents and ill health, assessing risks and implementing appropriate controls and consulting with our employees to ensure their equipment is safe and they have the relevant training to carry out their role. The Health and Safety Committee meet regularly throughout the year to discuss any concerns that have arisen and to ensure the correct improvements are implemented.

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## ENVIRONMENTAL IMPACT

Throughout FDM the responsibility to minimise detrimental impact to the environment is recognised. FDM aims to reduce its environmental impact by monitoring and minimising the consumption of energy in its operations and where possible promote the procurement of environmentally-friendly products. The Group complies with all relevant environmental legislation; it aims to reduce waste and, where practicable, re-use and recycle consumables. We monitor our emissions of greenhouse gases and report on them annually. There are recycling facilities in our offices and FDM recycles waste paper and ink cartridges. Computers that are no longer in use are donated to charities. Communication via electronic means, including video conferencing, is encouraged.

## IT AND SECURITY

The Group has developed and introduced its own bespoke Global Standard for Technology Security, which aims to achieve best market practice in the operational, behavioural and technical security measures to protect our IT systems and data. This Global Standard applies across the FDM Group and our consultants on client sites receive training in how to apply it to their day to day work. The Group has a separate IT security policy which complies with ISO 27001. Staff are regularly made aware of the risk of a cyber-attack and the appropriate actions necessary to mitigate the risk of this occurring. The Group's IT policy and security matters are regularly reviewed.

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## DATA PROTECTION

FDM is a people business and, as such, holds a large amount of personal data as part of its working practices. It is of utmost importance to us that this data is dealt with in accordance with global data protection legislation. Compliance in this area is critical to ensuring trust in our relationships with our stakeholders. We have a Data Protection policy which all employees must abide by and procedures in place to fulfil any of the required duties in respect of data protection obligations.

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## CONFIDENTIALITY AND ETHICS

FDM is committed to building strong relationships with all internal and external audiences including potential, current and past employees, clients and investors. Maintaining the highest degree of confidentiality in all our dealings is crucial. Our Global Standard for IT Security is signed by all employees and is showcased on all desktop images worldwide. This serves as a set of rules to adhere to in order to maintain the upmost confidentiality and security. We understand the importance of this and are continually reviewing current processes in order to ensure compliance. We conduct business ethically and with integrity, and expect our clients and suppliers to do the same.



FDM's goal is to ensure that its investment community has a clear understanding of FDM's strategy, business model, competitive position, financial information and strategic progress.

## BRIBERY AND CORRUPTION

## REPORTING ILLEGAL OR NON-COMPLIANT BEHAVIOUR

It is FDM's policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery and corruption. We have in place a published anti-corruption policy under which all our staff understand that we do not tolerate any type of bribery or corruption, and that they may not offer or promise any personal, financial or other advantage, in order to gain/retain business. The same is prohibited for FDM employees accepting preferential treatment or acts of bribery. Our employees are required to refrain from doing anything that could lead to any suspicion of such conduct or the attempt to mislead. Any type of bribery or corruption will lead to disciplinary action and potentially criminal charges.

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As stated above, the Group has a separate whistle-blowing policy, which enables employees to report concerns on matters affecting the Group or their employment, without fear of recrimination.

FDM employees can report any activities or practices that they believe may be inappropriate under this Code to HR, as well as any inappropriate or illegal actions that may not be detailed in this code. HR will investigate complaints and prohibits retaliation against employees for reporting something they believed to be non-compliant.

## FINANCIAL AND REGULATORY COMPLIANCE

As a publicly quoted company with a premium listing on the London Stock exchange we have in place a number of policies and procedures which are implemented by the Board of Directors to ensure that we comply with our financial and regulatory obligations. We operate a strict Share Dealing and Market Abuse policy under which all senior members of staff are required to seek clearance from the Board before trading in FDM's shares. The policy applies to all directors and employees of FDM and its subsidiaries, and has been designed to ensure that they do not misuse, or place themselves under any suspicion of misusing, any information about the Group which they hold and which is not public.

The Board also operates a Disclosure Policy and has appointed a standing Disclosure Committee of the Board whose role is to oversee the Company's compliance with its obligations to make public inside information in accordance with the applicable regulations, and to make other regulatory announcements from time to time. The Disclosure Committee is authorised by the Board to deal with all matters concerning inside information relating to the Company and the obligation of the Company to disclose such inside information via a Regulatory Information Service, and any other public announcements of the Company (whether periodic, necessary or otherwise desirable) pursuant to the Company's obligations under the applicable rules or otherwise.

We also have in place an Anti-Fraud policy which is designed to assist us in taking all reasonable steps to reduce the opportunity for fraud by putting and maintaining in place appropriate technical and organisational security measures and controls, and by such other methods as we consider necessary. FDM's policy is to take prompt action in the case of any suspected fraudulent activity from any employee, customer, supplier or partner.

## INVESTOR RELATIONS

FDM's goal is to ensure that its investment community has a clear understanding of FDM's strategy, business model, competitive position, financial information and strategic progress. FDM aims to meet this goal by engaging in clear and transparent communication to the investment community.

FDM's procedures for communicating with investors aim to ensure that relevant information about the Group's activities is communicated in a professional, disciplined and timely manner, to parties with a legitimate interest (subject to any overriding considerations of business confidentiality). FDM aims to have in place channels to enable effective two-way communication with investors so that the effectiveness of these procedures can be assessed regularly.

Accordingly, FDM has adopted a policy to outline its objectives and processes for effective communications between the Group and its various audiences.



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