

Code of Business Standards

How we do business, including our Health and Safety Statement and Disciplinary and Grievance Procedure

Owner	Version
James Moyies, Director	1.1
Next review	Applies to
12 months after approval, or sooner on material change	All directors, employees and contractors of Lead Ignition Ltd
Classification	Approval
Public	Signed by James Moyies, Director, 11 October 2026

1. Why we have this code

- 1.1 Lead Ignition Ltd is a small business. Our clients trust us with their systems and their customers' data. This code sets out the standards we hold ourselves to, in plain terms. It applies to all our directors and to every contractor working for us.
- 1.2 Where a client's own supplier code asks for more than this code (for example an industry body's or a partner's supplier code), we follow the client's code for that client's work.

2. Integrity

- 2.1 We are honest with clients, suppliers and each other. We do not overstate what we have done, what a system can do, or which certifications we hold.
- 2.2 We comply with the law, including data protection, anti-bribery, anti-money laundering, competition, sanctions and employment law.
- 2.3 We do not tolerate fraud, theft, false accounting or the facilitation of tax evasion by anyone acting for us.

3. Conflicts of interest

- 3.1 Tell the other director as soon as you become aware of anything that could conflict with your duty to Lead Ignition or to a client. Examples are a personal interest in a supplier, a family link to a client, or outside work for a competitor of a client.
- 3.2 Conflicts are recorded and managed, usually by stepping back from the decision. If a conflict cannot be managed, we decline the work.

4. Gifts and hospitality

- 4.1 Our rules are in the Anti-Bribery and Corruption Policy (People and Conduct Policies, section 4) and the Financial Crime Policy (section 5). In short: we never offer, give, ask for or accept anything intended to influence a business decision, and any gifts or hospitality must be modest, occasional and openly given. Section 4 of that policy sets out the detail.
- 4.2 Where a client's code prohibits gifts or hospitality to its staff, or to staff of an organisation it works with, we follow it without exception.

5. Fair competition

- 5.1 We win work on merit. We do not agree prices or divide customers with competitors, and we do not misuse a competitor's confidential information.
- 5.2 Our marketing is accurate. We do not make claims about results, certifications or clients that we cannot support.

6. Confidentiality and data

- 6.1 We keep client information confidential and use it only to deliver the service. Client data is never used for our own purposes, including marketing.
- 6.2 We follow our Data Protection Policy and Breach Procedure, Information Security Policy and Device and Acceptable Use Standard. Contractors sign our Confidentiality and Data Protection Agreement before they have any access.
- 6.3 We notify a client of a personal data breach affecting its data without undue delay and in any event within 24 hours of becoming aware.

7. Fair treatment of people

- 7.1 We treat everyone fairly and with respect, as set out in our Equal Opportunities and Dignity at Work Policy (People and Conduct Policies, section 2). We do not tolerate discrimination, harassment or bullying.
- 7.2 We do not tolerate modern slavery or human trafficking. See our Modern Slavery and Human Trafficking Statement.

8. Paying suppliers fairly

- 8.1 We pay suppliers and contractors on fair, lawful terms that are agreed in writing.
- 8.2 We pay valid, undisputed invoices **within 30 days** of receipt, and sooner where we have agreed to.
- 8.3 We **never** use "pay when paid" terms. A supplier's payment never depends on whether a client has paid us.
- 8.4 If we dispute part of an invoice, we pay the undisputed part on time and raise the dispute promptly.

9. Sanctions

- 9.1 We do not do business with any person, company or country subject to UK financial sanctions where that would breach the sanctions regime.
- 9.2 Before taking on a new client or supplier, we check it against the UK Sanctions List published by the Foreign, Commonwealth and Development Office. We record the check. If there is a match, we do not proceed.

10. Health and safety

Our Health and Safety Statement is in section 13.

11. Speaking up

- 11.1 If you see something that breaks this code, the law or a client's code, tell a director. If the concern is about a director, or you do not feel able to raise it internally, use the Whistleblowing Policy (People and Conduct Policies, section 1), which includes routes outside the business.
- 11.2 Nobody will be treated less favourably for raising a genuine concern.

12. Clients' codes, audits and breaches

- 12.1 Where we sign a client's supplier code, we follow it and keep evidence that we do.
- 12.2 We co-operate with reasonable client audits and questionnaires, in line with the audit terms in our data processing agreements.
- 12.3 We report any breach of a client's supplier code to that client promptly, and immediately where the client's code requires it.
- 12.4 A breach of this code by anyone working for us may lead to action under the Disciplinary and Grievance Procedure (section 14) or, for contractors, ending the engagement.

13. Health and Safety Statement

- 13.1 We work from home and from client sites. We have fewer than five employees, so we are not required to write down our health and safety policy, but we choose to.
- 13.2 **Responsibility.** James Moyies, Director, is responsible for health and safety and for this code. Everyone is responsible for working safely and reporting hazards.
- 13.3 **Home working.** Each person keeps their work area safe: clear walkways, safe electrics, adequate lighting and ventilation, and no trailing cables.
- 13.4 **Display screen equipment.** Everyone who uses a screen for work completes a short display screen equipment self-assessment when they start and when their set-up changes, covering chair, screen height, keyboard, lighting and breaks. Problems are raised with James Moyies and fixed. Anyone who uses a screen daily as a significant part of their work is entitled to an eye test paid for by the company.
- 13.5 **Lone working.** We mostly work alone. When visiting a client site or meeting someone new, tell the other director where you are going and when you expect to finish, and keep your phone with you.
- 13.6 **Wellbeing.** Take regular breaks away from the screen and keep reasonable working hours. Raise stress or workload concerns early.
- 13.7 **Accidents.** Report any work-related accident or near miss to James Moyies. It will be recorded, and reported under RIDDOR where the law requires.
- 13.8 **Insurance.** We hold professional liability insurance of £2 million for any one claim, cyber and data insurance of £1 million, employers' liability insurance of £10 million and public and products liability insurance of £2 million, with Markel (policy P066207).

14. Disciplinary and Grievance Procedure

- 14.1 This procedure applies to employees and follows the ACAS Code of Practice on disciplinary and grievance procedures. Contractors are managed under their contract. Issues are dealt with promptly, fairly and in private. Minor issues are first raised informally.

Disciplinary

- 14.2 **Investigation.** The facts are established before any meeting, without unreasonable delay.
- 14.3 **Notification.** The employee is told in writing what the concern is, given any evidence, and invited to a meeting at a reasonable time.
- 14.4 **Meeting.** The employee can explain their side and may be accompanied by a work colleague or a trade union representative.
- 14.5 **Decision.** The outcome is confirmed in writing. Outcomes may be no action, a written warning, a final written warning or, for gross misconduct or continued misconduct, dismissal. Examples of gross misconduct include theft, fraud, deliberate misuse of client data, and serious breach of security or of this code.

14.6 **Appeal.** The employee may appeal in writing within 5 working days. Where possible the appeal is heard by the director not involved in the original decision.

Grievance

- 14.7 An employee with a concern about their work, colleagues or working conditions should raise it informally with a director first. If that does not resolve it, they should put it in writing.
- 14.8 A meeting is held without unreasonable delay. The employee may be accompanied as above. The decision is confirmed in writing, with a right of appeal within 5 working days.

Small company arrangements

- 14.9 We are a small company. Where both directors are involved in, or are the subject of, a disciplinary or grievance matter, or no impartial director is available for an appeal, we will ask an independent HR adviser to hear it.

Approval

Approved and signed on behalf of Lead Ignition Ltd.

Signed	Name and role	Date
<i>James Moyies</i>	James Moyies, Director	11 October 2026
Signed electronically		Version 1.1