Corporate Ethical Policy – October 2026

1. Purpose and Scope

1.1 In-Form Solutions Ltd, a company registered in England and Wales under number 03961045, whose registered office is at 88 Hill Village Road, Four Oaks, Sutton Coldfield, West Midlands B75 5BE ("the Company"), is committed to responsible, honest and ethical business. This Policy sets out the standards we expect of ourselves and of everyone who works with us.

1.2 It applies to directors, employees, associate consultants, contractors, agents and anyone else acting on the Company's behalf ("associated persons"), and to our dealings with clients, suppliers and partners in England, Wales, Jersey, Gibraltar and anywhere else we work.

1.3 This Policy sets out our principles. More detailed rules are in the related policies listed in Part 12. It is not exhaustive, and all aspects of the Company's business should be carried out in its spirit.

2. Human Rights and Modern Slavery

2.1 The Company is firmly opposed to slavery, servitude, forced or compulsory labour and human trafficking in all forms, and to any cruel, inhuman or degrading treatment. We respect freedom of thought, conscience and religion.

2.2 The Company respects the rights set out in the Human Rights Act 1998 and the Universal Declaration of Human Rights in all its dealings with employees, associates and others affected by its work.

2.3 The Company complies with the Modern Slavery Act 2015. We take proportionate steps to make sure there is no modern slavery or human trafficking in our business or supply chains. We will not knowingly work with any person or organisation that fails to respect the human rights of its workers or of others affected by its activities.

2.4 Concerns about modern slavery should be raised under Part 11. They can also be reported to the Modern Slavery and Exploitation Helpline on 08000 121 700.

3. Equality, Diversity and Inclusion

3.1 The Company will not discriminate against anyone because of any of the characteristics protected by the Equality Act 2010: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

3.2 Everyone will be treated fairly and with respect, and the Company will make reasonable adjustments for disabled people. Employees doing equal work will receive equal pay.

3.3 The Company does not tolerate harassment, bullying or victimisation of any kind. It takes reasonable steps to prevent sexual harassment of its employees, including harassment by third parties such as clients, as the law requires.

4. Employees and Associates

4.1 The Company complies with all relevant employment law and regards it as the minimum standard, not the target.

4.2 Employees receive written terms of employment from the start, setting out their pay, when and how it is paid, their hours, any overtime arrangements, and their entitlement to annual leave, sick leave, family leave and other leave required by law.

4.3 No employee will be prevented from joining or forming a trade union or staff association, or suffer any detriment for joining or not joining one.

4.4 Associate consultants and contractors are independent businesses engaged on their own written terms. The Company treats them fairly, pays them on time and expects them to meet the standards in this Policy.

5. Environment and Sustainability

5.1 The Company is committed to keeping the environmental impact of its work to a minimum. It holds ISO 14001 certification, and its approach is set out in its Environmental Policy Statement and Carbon Reduction Plan, both available on request.

5.2 As a minimum, the Company meets all environmental laws wherever it works, and supports the NHS commitment to reaching net zero.

6. Conflicts of Interest

6.1 The Company depends on the trust and confidence of its clients, suppliers and staff. Conflicts of interest can undermine that trust.

6.2 Associated persons must declare any actual or potential conflict of interest to the Managing Director before starting work and as soon as it arises. Conflicts are recorded in the Conflicts of Interest Register and, where a client requires it, declared to the client. Full details are in the Anti-Bribery and Corruption Policy.

6.3 All officers, employees and representatives of the Company are expected to act honestly and within the law.

7. Information, Confidentiality and Use of AI

7.1 Information received by associated persons will not be used for personal gain, or for any purpose other than the one for which it was given.

7.2 The Company complies with the Data Protection Legislation, meaning the UK GDPR, the Data Protection Act 2018 and related law, as amended from time to time (including by the Data (Use and Access) Act 2025). It holds Cyber Essentials Plus certification and meets NHS information governance requirements.

7.3 The Company uses artificial intelligence tools responsibly, in line with its Generative AI Usage Policy. No patient-identifiable data is entered into AI tools unless the client's contract allows it and the safeguards in that Policy are met, and all AI-assisted work is checked by our consultants.

8. Honesty with Clients and Investors

8.1 Much of the Company's work is paid for with public money. We are honest and accurate in our proposals, invoices, timesheets and reports, and we never knowingly mislead a client.

8.2 No associated person will do, or fail to do, anything within their control that would deliberately, negligently or recklessly mislead the Company's shareholders, creditors or investors.

9. Suppliers and Partners

9.1 The Company expects its suppliers and partners to work towards and uphold similar ethical standards.

9.2 Before entering into an agreement, the Company carries out checks on new suppliers and partners in proportion to the risk, and may ask for information about how their goods and services are produced and sourced.

9.3 The Company pays its suppliers promptly and fairly, in line with the Prompt Payment Code.

9.4 The Company reserves the right to withdraw from any agreement or arrangement with a supplier or partner found to have acted against the spirit or principles of this Policy.

10. Bribery and Corruption

10.1 The Company takes a zero-tolerance approach to bribery, corruption and fraud, including facilitation payments as defined by the Bribery Act 2010. No associated person may offer, give, ask for or accept a bribe.

10.2 The full rules, including those on gifts and hospitality, are set out in the Anti-Bribery and Corruption Policy and the Gifts and Hospitality Policy.

11. Raising Concerns

11.1 Anyone with a concern about a breach of this Policy should raise it with the Managing Director, with the Chairman if the concern involves the Managing Director, or under the Whistleblowing Policy. No one will suffer any detriment for raising a concern honestly, even if it turns out to be mistaken.

11.2 A breach of this Policy may lead to disciplinary action for employees, or to the ending of the engagement for associates, contractors and suppliers.

12. Related Policies and Review

12.1 This Policy should be read with the Company's Anti-Bribery and Corruption Policy, Gifts and Hospitality Policy, Whistleblowing Policy, Generative AI Usage Policy, Equality, Diversity and Inclusion Policy, Data Protection Policy Statement, Information Governance Policy Suite (including the information security policies), Environmental Policy Statement and Carbon Reduction Plan.

12.2 This Policy is owned by the Managing Director and will be reviewed every 12 months, or sooner if the law, a client requirement or the Company's work changes.

This Policy has been approved and authorised by:

Name:	David Poynton
Position:	Chairman
Date:	29th October 2026
Signature:	
Issue:	Issue 4 (replaces Issue 3, 26 May 2023)

Next review:	October 2027