

Code of Ethical Business Conduct

Positive Smiles C.I.C.

Document control

Published Date:	03/12/2018	Author:	Shabir Siddiq – Director
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Version	Change Detail	Latest Review Date	Date of Next Review	Updated By:
1.0	Annual Review	03/12/2019	03/12/2020	Shabir Siddiq
1.1	Annual Review & Policy Amended	03/12/2020	03/12/2021	Shabir Siddiq
1.2	Annual Review & Policy Amended	07/12/2021	07/12/2022	Shabir Siddiq
1.3	Annual Review & Policy Amended	07/12/2022	07/12/2023	Shabir Siddiq
1.3	Annual Review Changed to Academic Year Start	01/08/2023	31/07/2024	Shabir Siddiq
1.4	Annual Review	01/08/2024	31/07/2025	Shabir Siddiq
1.5	Annual Review & header logo change	01/08/2025	31/07/2026	Shabir Siddiq
1.6	Annual review, Positive Smiles rebrand and realignment to adult services	01/08/2026	31/07/2027	Shabir Siddiq

INTRODUCTION

It is the goal of Positive Smiles to adhere to the highest ethical standards in all that it does. Positive Smiles expects that those who are part of the Positive Smiles community, including directors, staff and volunteers, will adhere to such standards in their dealings with each other and with those beyond the Positive Smiles community. Ethical business conduct calls for all Positive Smiles Personnel to assume responsibility for safeguarding and preserving its assets and resources in the fulfilment of its mission. Positive Smiles will comply fully with all relevant laws and all contract and grant requirements, as well as with its own high standards of integrity and quality. Positive Smiles Personnel are expected to assume personal responsibility and accountability for understanding relevant laws, regulations, and contract and grant requirements. In addition to complying with specific laws or regulations that govern business activities, standards of fairness, honesty, and respect for the rights of others will govern Positive Smiles' conduct at all times.

ETHICAL PRINCIPLES

a. Compliance with Laws

Positive Smiles will transact its business in compliance with the laws of the jurisdictions in which it does business. Positive Smiles Personnel will familiarise themselves with any legal obligations arising out of the work done for Positive Smiles, including but not limited to the obligations to comply with applicable recordkeeping requirements and not to retaliate against anyone who reports a suspected violation of the law. If questions arise regarding compliance with the law, or if it appears that one of Positive Smiles' policies conflicts with the relevant law, the person who becomes aware of that situation should contact a Director.

b. Contractual and Grant Obligations

In addition to its commitment to comply with applicable laws, Positive Smiles recognises its contractual obligations to funders and commissioners, suppliers, employees, and others with whom it contracts. Regardless of the source of funds, Positive Smiles will adhere to its contractual obligations.

c. Integrity and Quality

Positive Smiles Personnel should recognize that Positive Smiles has earned and must maintain a reputation for integrity and quality that goes beyond compliance with laws, regulations, and contractual

obligations. Positive Smiles strives for excellence in administration as well as in the services it delivers. Even the appearance of misconduct or impropriety can cause severe damage to Positive Smiles' reputation. As such, personnel must strive at all times to maintain the highest standards of quality and integrity.

d. Conflict of Interest

Positive Smiles Personnel should avoid situations that create or appear to create conflicts between their personal interests and Positive Smiles' interests. All decisions made by Personnel in the course of their professional responsibilities are to be made

solely on the basis of their desire to promote Positive Smiles' best interests. If an individual's personal interests might lead an independent observer reasonably to question whether the individual's actions or decisions on Positive Smiles' behalf are influenced by those personal interests, the individual should recuse himself or herself from the decision-making process and notify the responsible Positive Smiles officials, as described in more detail in the Conflict of Interest Policy of Positive Smiles.

In addition, it is Positive Smiles' policy to comply in all respects with UK law concerning conflicts of interest.

e. Confidential Information

Positive Smiles Personnel may have access to confidential, proprietary, and / or private information. Those who have access to this information may not make any unauthorised use or disclosures of the information, either during or after employment.

f. Antitrust Considerations

Like other organisations, Positive Smiles is subject to UK competition law, which aims to protect fair competition. For this reason, Positive Smiles Personnel should avoid agreements or exchanges of information with other providers that unfairly affect competition, including when bidding for grants or contracts. Positive Smiles Personnel should never enter into agreements with other providers regarding future fees, bid prices or salary levels, and should not disclose or exchange future plans on these subjects with other providers.

g. Financial Reporting

All Positive Smiles financial information, including financial reports, tax returns, expense reimbursements, time sheets, and other documents, including those submitted to government agencies and funders, must be accurate, clear, and complete. All entries in Positive Smiles' books and records, including project accounts and individual expense reports, must accurately reflect each transaction. Retention of these documents shall conform to Positive Smiles' Data & Record Retention Policy.

h. Authority to Contract

All transactions must be authorised by the appropriate individual. Individuals who enter into contracts on Positive Smiles' behalf should confirm the extent of their authority to do so on a regular basis.

i. Accepting Gifts

Employees representing Positive Smiles are expected to uphold the integrity of the organisation while conducting business with outside organisations, vendors and individuals. All employees are expected not to compromise any business transaction in exchange for personal benefit such as gifts. Promotional items of an advertising nature, an occasional business meeting meal, or items of insignificant value that do not exceed the value of a business meeting meal are acceptable. Gifts outside of these guidelines would be deemed unacceptable and shall be returned.

j. Consequences of Violations of Positive Smiles' Policies

Each person is responsible for ensuring that his or her own conduct and the conduct of

anyone reporting to him or her fully comply with this Code and with Positive Smiles' policies. Violations may result in the taking of appropriate disciplinary action up to and including dismissal. Disciplinary action will be taken in accordance with the procedures applicable to staff. Conduct representing a violation of this Code may, in some circumstances, also subject an individual to civil or criminal charges and penalties.

REPORTING OF SUSPECTED VIOLATIONS

a. Reporting to Management

Positive Smiles Personnel should report suspected violations of applicable laws, government regulations or Positive Smiles policies. This reporting should normally be made first to the employee's line manager. Alternatively, employees may go directly to a Director to report suspected violations or problems.

b. Cooperation

All employees should cooperate fully in the investigation of any misconduct.

QUESTIONS ABOUT THE CODE

Questions about this Code may be directed to a Director or to your line manager.

Signed by the Director



01/08/2026