



# *Code of Ethics*

## ***Introduction***

At Black Sun Global, we believe that ethical conduct is fundamental to achieving the goal of successful stakeholder engagement. This Code of Ethics outlines the principles that govern our decision-making and actions, both internally and in our interactions with our stakeholders. We expect all Black Sun Global employees to uphold these standards and contribute to a culture of integrity, professionalism, and environmental and social stewardship.

Black Sun is committed to upholding the law. We comply with all applicable laws and regulations in the countries where we operate, including those related to labour practices, environmental protection, anti-corruption and data privacy.



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## ***CEO Foreword***

At Black Sun, we have a long history of advocating for ethical practice – both internally and for our stakeholders. I am determined to ensure that this is something we begin to formalise in the public domain. To help achieve this, we have launched our Code of Ethics as we bring to life what has been at the crux of our business for the past three decades.

Aligning with this Code is essential. While this document provides guidance, we rely on your responsible judgement in line with our Ethics policies. If you are unsure about what the right decision is or have concerns, please reach out to a trusted leader, or ask for help.

Alongside the Executive Leadership team, I provide a personal commitment to uphold the values of this Code and to personally always support our employees, clients and partners, allowing our business to be the best it can be.

**David Christopherson,**  
CEO

**Black Sun Global**



## ***The Changemaker Way***

Our Group brings together an incredibly diverse range of skills and experience, drawn from teams around the world working across many disciplines and sectors. However, we're deeply connected by two powerful forces: our purpose and our values.

As changemakers, we're guided by five core values that define how we work, lead, and create positive change together:

### **Learn and grow**

We're curious and we're pioneers, always moving forward

### **Be courageous**

To do the right thing, to strive for more and build something better

### **Deliver excellence**

By driving positive change and lasting impact for our clients

### **Show respect**

To each other, our clients, our communities and the resources we rely on

### **Go together**

We're collaborative and transparent, always in true partnership



## ***Our Stakeholders***

Black Sun understands that our stakeholders (clients, partners and suppliers, people) want to do business with a company they trust, and that people want to work for a company they respect. This anchors our thinking.

### **Our Clients**

We prioritise our clients' needs and work diligently to exceed their expectations. We aim to deliver high-quality services with integrity and transparency.

**Confidentiality:** We respect the confidentiality of client information and handle it with discretion. We only disclose information as authorised.

**Objectivity and Fairness:** We provide objective and unbiased advice based on sound principles and best practices. We treat all clients with fairness and avoid any conflicts of interest.

**Continuous Improvement:** We strive to continually improve our service offerings to deliver the most effective and impactful solutions for our clients.

### **Our Suppliers**

We are committed to monitoring and managing the social, environmental and ethical impacts of our business. This approach is integral to the way we work with supplier partners across day-to-day operations. When engaging with our suppliers:

- We ask them, where possible, to match our own policies and practices.
- We are careful to assess not only their costs, ability to meet deadlines, quality and service levels, but also their environmental and ethical credentials.

### **Our People**

Black Sun is committed to fostering a workplace environment that is respectful, inclusive, and free from discrimination, harassment, and bullying. We believe in equal opportunity and fair treatment, where we provide equal opportunities for all employees regardless of race, ethnicity, religion, gender, sexual orientation, age, disability, or any other protected characteristic. We encourage open communication, and a culture of respect where diverse viewpoints are valued and heard. We are committed to providing a safe and healthy work environment for all employees.

- **Respect and Dignity:** We treat all colleagues with respect and dignity, regardless of their background, beliefs, or any other factor. We foster a workplace free from harassment, discrimination, and bullying.
- **Collaboration:** We value teamwork and collaboration. We openly share information, listen actively to different perspectives, and work together to achieve our goals.
- **Professionalism:** We maintain a professional demeanour in all interactions with colleagues. We conduct ourselves with honesty, integrity, and ethical behaviour.
- **Education and Training:** Our people are the key to our success and our business has grown and developed over the years because of the people who work here. Motivating and nurturing our employees is vital. We invest in this through continual education, support and training.



## ***Advocating for Sustainability***

As of 2024, Black Sun Global is a member of the United Nations Global Compact (UNGC), marking a significant milestone in Black Sun's commitment to sustainability. This membership is a key step in its recently announced sustainability strategy and reinforces the dedication of the Company to responsible business practices across all its operations around the world.

The UNGC is the world's largest corporate sustainability initiative, advocating for sustainable and socially responsible policies. By joining, Black Sun Global is committed to its principles in human rights, labour, the environment, and anti-corruption. The affiliation also offers a platform to collaborate with global leaders in sustainability, ensuring Black Sun stays at the forefront of responsible business practices.

- Environmental Responsibility: We are committed to minimising our own environmental impact and actively seek opportunities to promote sustainable practices within our operations. We encourage our clients and partners to do the same.
- Community Engagement: We strive to be a positive force in the communities where we operate. We engage in responsible practices and support initiatives that benefit the well-being of our communities.
- Advocacy: We advocate for sound environmental policies and promote sustainable practices in the broader community.
- Resource Stewardship: We use Black Sun's resources responsibly and avoid any wasteful practices.
- Protecting our Reputation: We should also always ask ourselves what is the possible impact of our actions on Black Sun's reputation. Our reputation depends on the behaviour of each and every one of us.

As of 2024, Black Sun Global is also a signatory to the United Nations Women's Empowerment Principles (WEPs) which are a set of Principles offering guidance to business on how to advance gender equality and women's empowerment in the workplace, marketplace and community.

## ***Data protection and cyber security***

Black Sun is committed to working safely and securely with data and supports the data protection rights of all those with whom it works. This policy sets out the accountability and responsibilities of the Company, and its employees, to comply fully with the provisions of the UK General Data Protection Regulation ('the UK GDPR') and the Data Protection Act 2018 ('the DPA'). We recognise that handling personal data appropriately and in compliance with data protection legislation enhances trust, is a critical business requirement, the right thing to do and protects Black Sun's relationship with all its stakeholders.

Black Sun takes information security very seriously and as such, every single member of staff plays a vital role in keeping Black Sun and client data secure at all times.

- All members of staff are enrolled onto the Cybsafe online Cyber Security Training and awareness platform which consists of multiple modules that cover different areas of information security and is mandatory to complete.
- Black Sun has an ISO27001 certification and is subject to an external audit to provide a review of all its information security controls.



## ***Health and safety***

Under existing Health and Safety at Work legislation, Black Sun has a duty to ensure the health and safety and welfare at work of all its employees and other persons under its control. As far as is reasonably practicable, we aim to conduct our activities in such a way as to minimise any possible risk to these individuals.

Black Sun is committed to ensuring the health, safety and welfare of all employees and to maintaining the best possible standards in this respect.

This commitment to health and safety is a management responsibility of equal importance to other management functions. It will be the duty of Black Sun's leadership team to ensure this policy is upheld at all times and to provide the necessary funds and staff required to implement any necessary changes.

We will comply with our responsibilities in such a way as to ensure that employees and visitors are not exposed to risks to their health and safety. Where such risks exist, all reasonable steps will be taken to bring this to the attention of Black Sun employees and we will minimise the risks as appropriate.

## ***Mental health and wellbeing***

We aim to support the mental health and wellbeing of our employees whilst maintaining a healthy, productive, and collaborative workplace. Our focus is to ensure that everyone feels appreciated and are treated fairly within the workplace. We are committed to protecting the health, safety and wellbeing of our staff. We recognise the importance of identifying and tackling the causes of work-related stress and also recognise that personal stress, where unrelated to the workplace, can adversely affect the wellbeing of staff at work.

We have a legal duty to take reasonable care to ensure that your health is not put at risk by excessive pressures or demands arising from the way work is organised.

Our mental health policy takes account of our obligations under the Health and Safety at Work Act 1974, Management of Health and Safety at Work Regulations 1999, Employment Rights Act 1996, Protection from Harassment Act 1997, Working Time Regulations 1998 and Equality Act 2010.

## ***Responsible drinking***

As a responsible employer, our employees' safety and welfare at work is a top priority. That is why we have a policy regarding drinking at work.

This policy outlines the responsibilities of the Company as well as those of the employee, and it gives clear guidelines about what is expected of both.

- Our employees are ambassadors of the Company and are encouraged to exercise personal responsibility whenever they consume alcohol.
- No level of impairment due to alcohol during working hours is tolerated.
- Despite our policy, moderate consumption of alcohol in a working context can apply, but only if complying with guidelines as defined in the local policy.
- There is clear disciplinary action for anyone who breaches Company policy, which may affect employment prospects with the Company.



## ***Human rights and labour standards***

At Black Sun, we conduct our business in a manner that respects the rights and dignity of all people, complying with all legal requirements. We respect internationally recognised human rights as set out in the International Bill of Human Rights and the core labour standards recognised by the International Labour Organization (ILO), as set out in the ILO Declaration on Fundamental Principles and Rights at Work.

In meeting our responsibility to respect human rights, we consider relevant international human rights standards, including UN instruments establishing or elaborating on the rights of specific groups. We respect the rights of individuals belonging to groups or populations which may be particularly vulnerable to adverse impacts, including: indigenous people; women; national or ethnic, religious and linguistic minorities; children; LGBTQ+ people, people with disabilities; and migrant workers and their families.

Consistent with our commitment to respect ILO core labour standards, we respect freedom of association and collective bargaining. We support the elimination of all forms of forced or compulsory labour, the effective abolition of child labour and the elimination of discrimination in respect of employment and occupation.

## ***Insider trading***

The nature of our work gives us access to confidential client information that is not available to the public. If disclosed, this information could be useful to our clients' competitors or damaging to us or our clients.

At Black Sun Global, we prohibit the purchase or sale of a company's securities by individuals who possess material non-public information about that company.

Our policy applies to the leadership team, officers, employees and Independent Contractors who are subject to Black Sun's policies, either through an engagement, non-disclosure, or other agreement related to the services provided or who are reasonably expected to be exposed to material non-public information through their relationship with Black Sun.

## ***Whistleblowing***

Black Sun aims to conduct its business at all times with the highest standards of integrity and honesty. We expect all workers to maintain the same standards in everything they do. All those who work for us are therefore strongly encouraged to report any perceived wrongdoing by the business or its employees, contractors or agents that falls short of these principles.

We recognise that workers may not always feel comfortable about discussing their concerns internally, especially if they believe that the business itself is responsible for the wrongdoing. The aim of this policy is to ensure that they feel confident to raise any concern about our business activities in the knowledge that it will be taken seriously, and that no action will be taken against them.

This policy applies to any protected disclosure made during the employment and also after this has ended. This policy is not contractual but sets out the way in which we plan to manage such issues.





## ***Equal Opportunities***

Black Sun is committed to fostering a workplace environment that is respectful, inclusive, and free from discrimination, harassment, and bullying. We believe in equal opportunity and fair treatment, where we provide equal opportunities for all employees regardless of race, ethnicity, religion, gender, sexual orientation, age, disability, or any other protected characteristic. We encourage open communication, and a culture of respect where diverse viewpoints are valued and heard. We are committed to providing a safe and healthy work environment for all employees.

We are also committed to the principle of equality of pay for men and women. In this context, pay includes not only remuneration but also such benefits as promotion and training opportunities and other benefits provided to employees from time to time.

## ***Bribery and Corruption***

Black Sun prohibits bribery and corruption in all business dealings, in every country around the world, with both government and private sector parties. It is our 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.

We will not request, accept, offer, provide or authorise bribes of any kind, including facilitation payments (defined below). Nor do we contribute to any political campaign, party, candidate, or their affiliated organisations. Bribes can take the form of gifts, entertainment, rebates, donations or favours. This summary provides an overview of the rules that must be followed to avoid behaviour that may be seen as bribery.



## ***Anti-harassment***

We oppose the exploitation of workers and we will not tolerate physical, verbal or psychological harassment, or intimidation of any kind. Harassment or discrimination on the grounds of sex, race or disability includes inappropriate physical or verbal conduct or behaviour, unwelcome physical contact, any inappropriate comments about appearance, inappropriate questions about sexual or racial matters, requesting sexual favours and making lewd or offensive remarks, gestures or other behaviour.

Sexual harassment shouldn't be tolerated, but it can and does happen, including in the workplace. It can damage lives, poison the workplace environment and result in lasting psychological and social trauma. Black Sun Global policies and procedures aim to combat this and are based on internationally recognised instruments including:

- ILO Convention 111 on non-discrimination in employment – The ILO considers sexual harassment to constitute a serious form of sex discrimination and distinguishes two forms of sexual harassment that should be prevented and prohibited:
  - Conduct of a sexual nature which is unwelcome and offensive for the recipient and used as a condition for employment or access to benefits
  - Conduct that creates an intimidating, hostile or humiliating working environment for the recipient.
- The OECD Guidelines for multinational enterprises – The Guidelines require companies to continuously carry out human rights due diligence to prevent and to redress any actual or potential adverse impacts on the human rights of workers resulting from the actions, or omissions, of their management. The Guidelines define human rights with reference to, among other instruments:
  - The ILO core Conventions
  - The Universal Declaration of Human Rights
  - The International Covenant on Economic, Social and Cultural Rights
  - The Convention on the Elimination of all forms of Discrimination against Women, CEDAW.

The full range of sanctions of the Company's disciplinary procedure will apply to any cases of harassment or bullying, including dismissal where justified. You may be asked to participate in a disciplinary hearing arising from your report, but this is not always necessary.