



The Employee Owned Biostatistics CRO

## PLUS-PROJECT CODE OF CONDUCT

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Version Control Table

Version	Date of Version	Signed	Reason for Change	Areas Changed
1.0	25 March 2024		Initial version	N/A
2.0	15 May 2025		Review cycle	Added section on Reporting Suspected Misconduct

The Plus-Project Code of Conduct will be reviewed every two years at a minimum.

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## Foreword

Here at Plus-Project we embrace a unique model of shared ownership for all employees. With ownership comes accountability, opportunity, and responsibility; responsibility to each other, responsibility to our clients and responsibility to conduct ourselves in a manner becoming of a business owner. The impact of shared ownership permeates all our business dealings fostering a culture of excellence.

This Code of Conduct outlines commitments to the way we approach our work at Plus-Project but as the adage goes “Actions speak louder than words”.

## Introduction

Plus-Project is a Contract Research Organisation (CRO) supplying biometrics services from its head office at Booth's Park, Knutsford, England. Founded by Michael Wall, Alison Wall, and Philip Rowe in April 2014 the Plus-Project ethos is to recruit the most talented individuals and invest heavily in core skills.

On 18 December 2019, Plus-Project adopted an employee ownership model and sold a majority shareholding to an Employee Ownership Trust (EOT), becoming the first in our market. Delivering high returns to employees, this unique offering is attractive to new recruits, helps keep staff attrition low and helps maintain stable teams for our clients. Our reputation for excellence and our commitment to our team through Employee Ownership, is becoming increasingly known across the industry.

At Plus-Project, we care about our people (employees, clients, suppliers, and communities), our planet (the impact that we have directly or indirectly through our operations and partnerships) and places (the locations where our offices are based and the wider impact through our operations). These are incorporated into our core values.

## Our Core Values

Plus-Project is the first employee-owned CRO in the pharmaceutical industry. By providing a significant and meaningful stake in Plus-Project for all employees, Plus-Project attracts and retains the best talent, creating stable teams and happy employees, while delivering excellent quality services to our clients.

### **We are committed to:**

- Excellence in all that we do
- Taking a client centric approach
- Sustainability across our business
- Employee well-being and inclusivity
- Valuing our supply chain partners
- An ownership mentality and pursuing continuous improvement
- Operating fairly, transparently, honestly, and ethically

## Anti-Corruption and Preventing Bribery

Plus-Project is committed to ethical and honest business practices. We ensure our employees are trained in preventing bribery and corruption practices and implement these in our policies and processes where applicable. We operate fairly and transparently with employees, clients and suppliers.

**Insider trading** - Due to the nature of our core business, biostatistics support for clinical trials, Plus-Project employees access client “material non-public information” daily. Plus-Project employees must not trade

in stocks whilst possessing “material non-public information” or encourage such trading by others. We will take part honestly, openly and promptly during any financial regulatory authority investigations.

**Conflict of interest** – we expect transparency in our contractual relationships, including any conflict of interest where a supplier is involved in multiple interests, financial or otherwise.

**Gifts and entertainment** - we have an anti-corruption policy (Section Q of Employee Handbook) which prohibits actions that can amount to bribery and corruption. This includes soliciting, accepting, or receiving any benefit as an incentive, favour, or inducement for inappropriately performing a function or activity. We also prohibit offering, promising, or giving any benefit (such as money, gifts, or hospitality) or an advantage to another entity as an incentive, favour, or inducement for improper performance of a function or activity.

**Money laundering** – Supporting or facilitating any form of money laundering is strictly prohibited. Plus-Project employees must take reasonable care not to (deliberately or otherwise) communicate or engage with any persons suspected of money laundering.

**Whistleblowing** - Plus-Project operates with the highest standards of honesty and integrity, and we encourage all employees to report any suspected wrongdoing. Plus-Project does not allow any form of retaliation for participation in a good faith report or investigation and has procedures (Section W of Employee Handbook) in place for the handling and investigation of any such reports.

## Confidentiality

Confidentiality of information and data are fundamental to our business. Employees are expected to treat all communications as confidential.

Plus-Project will control and process data in compliance with GDPR (General Data Protection Regulation) and any other relevant data protection laws (see also SOP-IT-003 Data Protection Policy).

## Environment

We are committed to NetZero and are listed as a [Company Taking Action](#) on the globally recognised SBTi (Science Based Targets Initiative) website. As a service-based Small and Medium-sized Enterprise in the life-sciences sector, we recognise that working with our suppliers to reduce our scope 3 emissions is a priority. Our scope 3 emissions are mainly made up of IT waste, business travel, and emissions in our supply chain.

We are working with <https://www.nationalitidisposal.co.uk/> to ensure that we reduce-reuse-recycle our IT Kit, a free service available to registered UK businesses and organisations.

## Financial Integrity

Plus-Project accounts will be based on a fair representation of facts, and will be accurate, complete, honest, and timely.

Plus-Project complies with all applicable tax laws and regulations of each country and region where we conduct business. In the interests of transparency, Plus-Project posts publicly their Tax Strategy.

We formalise all financial agreements with suppliers in a contract or written agreement which includes a description of the services being provided and the associated fees.

## Health, Safety, and Well-being

We work hard to ensure the safety of our employees, both at home and in our offices, with policies and procedures in place covering physical and mental well-being. Plus-Project offers flexible working to all employees (where contractual agreements allow), a range of benefits included in contracts of employment and other employee benefits to support individual circumstances.

We have the relevant insurances in place to cover our business, employees, and our clients.

## Human Rights

Plus-Project is committed to protecting human rights, adopting a zero-tolerance policy to slavery, child labour, and human trafficking. Further details can be found in Plus-Project's Human Rights Statement publicly available on our website.

## Respect and Inclusivity

Plus-Project strives to promote an inclusive culture. Plus-Project will not discriminate based on age, disability, sex, or sexual orientation, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or beliefs.

Plus-Project deplores all forms of harassment or bullying and seeks to ensure that all employees are always treated with respect and dignity. Further details can be found in Plus-Project's Inclusion & Diversity Policy.

## Teamwork

Here at Plus-Project we always aspire to the following "We are not a team because we work together. We are a team because we respect, trust and care for each other" and our clients.

## Supplier Selection

Our supplier relationships are formed with excellent business service in mind, whilst reflecting the need for diversity to provide opportunities in our industry. We actively seek suppliers who will uphold our ethics and ethos. We welcome organisations and individuals from underrepresented groups who wish to work for or with Plus-Project. We assess suppliers based on their client experience, sustainability, and modern slavery commitments.

## Reporting Suspected Misconduct

### Who Must Follow The Code of Conduct?

Put simply, all Plus-Project employees are accountable for upholding this Code of Conduct.

### How Does The Code of Conduct Help?

The Code of Conduct does not cover every situation or serve to replace good and sound judgment. It merely acts as a guide. If you are having difficulty or uncertainty with a decision, ask yourself:

- Why am I making this decision?
- Does it appear aligned with Plus-Project's core values and principles?

If you have a question about our Code of Conduct, please ask your Head of Function or Chief Executive Officer/Chief Operating Officer.

### **What If Something Goes Wrong?**

To make a report, talk with your Line Manager first. If you feel uncomfortable with that, please contact Human Resources, Head of Function or Chief Executive Officer/Chief Operating Officer. This can be done in person, via email or via instant message.