



## **MNJV Code of Ethics**

The purpose of this policy is to promote honest, ethical 'conduct' which will maintain the trust of our clients and contractors. This 'Code of Ethics' encompasses all employees of the Morson Group Plc and all of its overseas employees.

HR Manager Becki Ross Will be in charge of monitoring any complaints against

- individual employees
- departments
- the company as a whole.

Becki Ross is authorised to formulate and implement rules, procedures and educational programmes designed to promote the effectiveness of this code. Becki Ross will be supported by MNJV Quality Manager Maria Heath who will aid in the production of related policies and procedures and will ensure rules are being adhered to when conducting Group Quality Audits. Becki will report to the MNJV Contract Sponsor Dr. Kevin Gorton who approve all policies and procedures and become involved with disciplinary action when necessary.

### **Principles of the Code:**

- All personnel are expected, as Professionals, to comply with this code of conduct
- All clients, contractors, competitors and suppliers shall be treated fairly
- The Morson Group Plc will comply with all laws, regulations and legislation that applies to each of its offices both within the UK and internationally
- All employees will at all times act with propriety and decorum fitting to the image of MNJV.

### **No Conflicts of Interest:**

ALL conflicts of interest **MUST** be disclosed where any may be perceived to exist. A conflict of interest occurs when an employee's private interests interfere in anyway – or appear to interfere – with the company as a whole. This may include:

- Actions or interests of an employee that may make it difficult to perform his/her work efficiently and objectively.
- Ownership or substantial management control by an employee or a member of their family, of an outside concern that does a material amount of business with any part of MNJV
- Indebtedness to a competitor company

**Law Abiding:**

The activities of MNJV must always be in full compliance with all laws, rules and regulations of the jurisdiction in which MNJV conducts its business. Any uncertainties as to whether a contract, transaction or course of conduct complies with the laws, rules and regulations to which MNJV is subject should be discussed with relevant management personnel and the employee should act in accordance with this advice.

**Fair Treatment:**

MNJV will at all times:

- Show no preference or advantage
- Behave without prejudice
- Intend to be clear, honest and realistic and never intentionally induce misperception
- Have open communication with its clients and contracts and swift response times
- Expect its employees to deal fairly with the Morson Group's customers, suppliers and competitors and will win or award business based in excellence of service and competitive pricing

**Integrity**

Employees are expected to perform their duties in a manner that advances the company's legitimate interests. Employees are prohibited from:

- Using Company property or information or their position in the company for their own personal gain
- Competing with the company

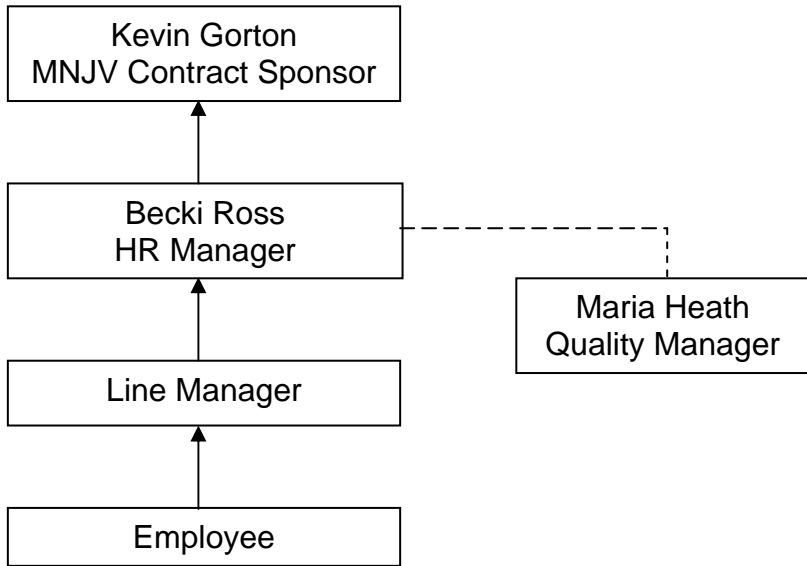
**Reporting Violations**

MNJV is committed to supporting employees in meeting and maintaining the ethical standards presented in this code of conduct. To this end, Employees are encouraged to talk to line managers, the HR Manager or the Quality Manager when in doubt about the best course of action in any given situation.

If an employee becomes aware of anything that occurs which could in any way be construed as a fraudulent or illegal act, or an act that in any way violates this code, the employee is responsible for reporting this to the HR Manager who shall be able to take the necessary course of action.

Any violations of this code or failure to co-operate with an internal investigation of an actual or apparent violation of this code may constitute grounds for corrective action. This may include immediate dismissal.


### Reporting Structure



Signed.... 

Date 05.06.2009

Dr. Kevin Gorton: MNJV Director

Signed.....   
Mike Barbe

Date 05.06.2009