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# MPS Code of Ethical Conduct

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## Introduction from the Chair of Council

Our Medical Protection Society (MPS) Purpose is to protect the careers, reputations and financial security of doctors, dentists, healthcare professionals and organisations around the world.

By protecting them, standing up for them and advising them we enable healthcare professionals around the world to carry out their vital work on behalf of patients. Members can practise with confidence in the knowledge that we are here for them when they need us most.

We are a mutual organisation and so we are owned by our members. As such, we are not only the custodians of our members' subscriptions to ensure that future claims can be paid but we also represent their collective voice.

This Code of Ethical Conduct (the Code) sets out the expectations MPS has of all colleagues, including any individuals or organisations acting on our behalf, and to demonstrate our commitment as individuals, and as a business, to operating responsibly and to living by our MPS Values.

We require all colleagues to live up to this Code and any non-compliance will be taken very seriously. The Council all agree on this point, which is why we ask that you read, understand and sign your acceptance to this Code every year.

We acknowledge there will be occasions when we get it wrong, but when this happens, we will put things right as quickly as possible.

Ultimately, we are here to provide the best defence for our members and their reputation, and we should all take pride in what we do and the vital part we play within healthcare delivery - no matter what role we perform at MPS.

This Code must therefore guide our decision-making and help us put into practice our commitment to strive to always do the right thing.

Please read this Code carefully and if you have any questions, speak with your line manager.

**Ian Eardley**

**Chair of Council**

**September 2021**

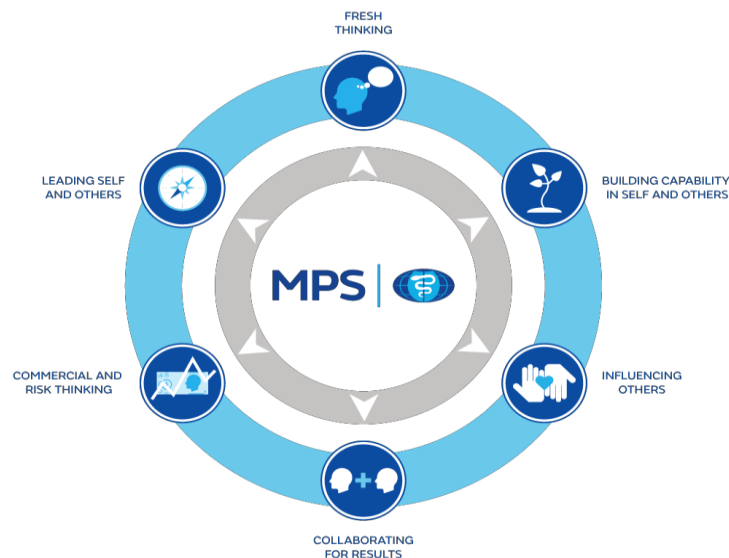
## Applying the Code

This Code applies to every individual employed by MPS, whether on a permanent or temporary basis and in addition to any external contractors, agency workers or third parties.

It exists to ensure MPS operates in a fair, open and honest manner always, and in full compliance with its legal obligations, avoiding corrupt or exploitative practices.

All colleagues are responsible, both individually and collectively, for maintaining high standards of legal and ethical business conduct within MPS, which means everyone must commit to:

- ✓ Comply with this Code and MPS Group Policies and Procedures.
- ✓ Never use position, opportunities discovered through that position and/or company resources for personal gain.
- ✓ Protect MPS resources because they are ultimately held on behalf of MPS members
- ✓ Role model the MPS Values at all times
- ✓ Take responsibility for leading selves in accordance with the **MPS Leadership Framework** (below) which provides a clearly illustrated set of performance expectations and core competencies.



Colleagues must read and sign acceptance to abide by this Code every year.

Colleagues must understand that failure to do so will result in the automatic withholding of any bonus they may otherwise have been awarded.

Any breaches of the Code may itself result in disciplinary action.

Additionally, MPS operates a [Third Party Code of Conduct](#) which must be given, with a clear expectation for compliance with, to all suppliers who provide services to and on behalf of MPS.

## Living the MPS Values

Values are an internal reflection of how we conduct business and ourselves.

It is important that colleagues live by our Values to help protect MPS members, each other and MPS. By living the Values, colleagues actively seek out and address what is wrong, and create a climate where everyone feels able to speak out about any genuinely held concerns regarding actions or decisions, they think are wrong. The MPS Values are:



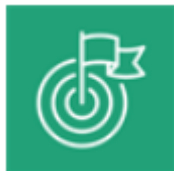
### Member First

*We passionately care about our members. We are dedicated to treating them fairly and placing them at the heart of everything we do*



### Ambitious

*We look to the future, keeping our minds open to embrace new ideas. We welcome feedback and seek out opportunities to grow and learn to be our best self*



### Determined

*We make things happen. We work together and at pace to deliver the best outcomes for our members*



### Empowered

*We respect and trust each other to carry out our work with skill, expertise and integrity. We have the freedom and confidence to make decisions and own the choices we make*

## Acting Ethically: Core Principles

We must all lead by example, encouraging responsible and ethical behaviour. Everyone is encouraged to do the right thing to protect our members, assets, reputations and each other.

### Loyalty and Diligence

*Colleagues, directors and Council members, whenever involved in MPS business, are expected to put the interests of MPS ahead of their own personal interests. All business conducted on behalf of MPS should be performed in a diligent and loyal manner. To do this, colleagues should avoid conflicts and outside interests in potential conflict with those of MPS, and all conflicts should be declared.*

### Compliance with the Law

*MPS is committed to conducting its business in compliance with the laws and legal requirements in each of the jurisdictions in which MPS operates.*

*MPS will not tolerate any kind of fraudulent or corrupt business practice, or practice which in any way promotes or supports slavery, servitude, forced and compulsory labour or human trafficking.*

### Transparency of Activities

*MPS is committed to conducting our business in a straightforward, honest and open manner. All colleagues, directors and Council members are expected to adhere to this requirement.*

### Respect for Human Dignity

*MPS is committed to providing a safe and healthy working environment. An environment which is free from discrimination, harassment, violence and the impact of alcohol or illegal drugs.*

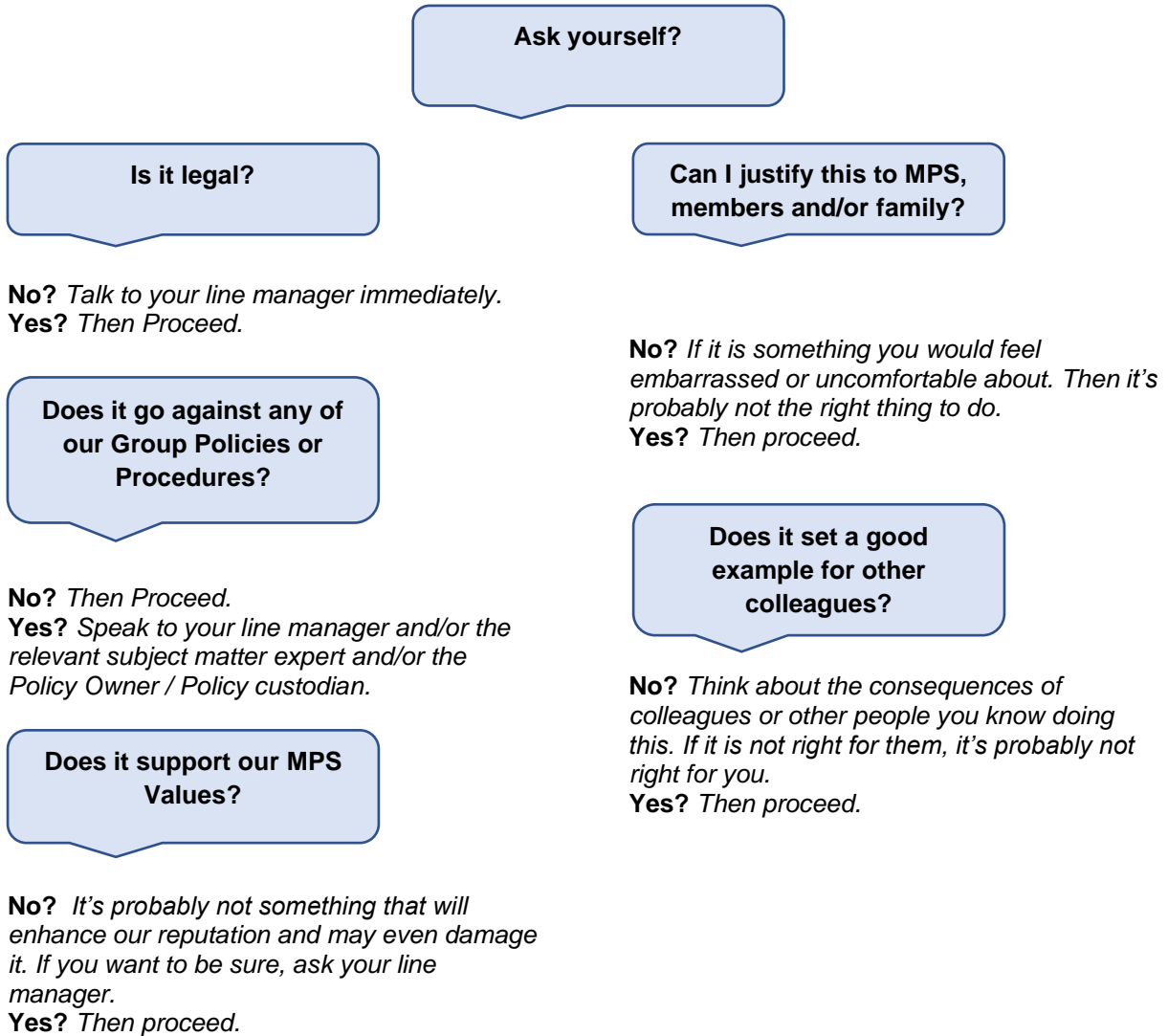
Colleagues must read, understand, and adhere to all MPS Group policies and procedures applicable to their role, including:

- Bullying and Harassment Policy
- Conduct at Work Policy
- Equality and Diversity Policy
- Health and Safety Policy

## Making the Right Decision

Policies and Guidance cannot cover every conceivable circumstance. The decision guide below should be used to help colleagues make decisions about appropriate business conduct.

If in doubt, colleagues should test a decision to make sure it is appropriate.



### How to Raise a Concern

MPS is committed to promoting and ensuring a working environment where colleagues are treated with respect and courtesy.

Colleagues can raise concerns in the following ways:

- Ask their line manager for guidance
- Talk to a senior leader in their business area
- Raise a concern confidentially or anonymously, via the Whistleblowing function

MPS operates a **Group Whistleblowing Policy** to help promote and make clear that colleagues can raise any concerns they may have about illegal or improper behaviour without fear of victimisation, discrimination or disadvantage.

Whistleblowing is about raising concerns relating to wrongdoing risk or malpractice witnessed in the workplace. These concerns should be in the public interest. If the concern is about a grievance in respect to a personal position, colleagues should refer to the **MPS Grievance Policy**.

MPS has a culture of openness and the Policy provides colleagues with a clear understanding of when and how whistleblowing can and should be used.

Colleagues must reasonably believe that the disclosure tends to show past, present or likely future wrongdoing falling into one or more of the following categories:

- A criminal offence, for example fraud
- Someone's health and safety is in danger, risk or actual damage to the environment
- A miscarriage of justice
- A law is being broke, for example the company does not have the right insurance
- Believing someone is covering up wrongdoing

Colleagues can follow the following procedure where they have a concern:

In the first instance, colleagues should discuss any suspected wrongdoing with their line manager. Where a colleague feels more comfortable reporting outside their line management structure, they can report their concern to the below dedicated email mailbox or phone number with voicemail mailbox: [Whistleblowing@medicalprotection.org](mailto:Whistleblowing@medicalprotection.org) or call +44 (0)113 8438210 (Internal 8210)

Where a colleague does not consider the mailboxes to be appropriate, concerns can be raised directly with the Chair of the MPS Audit & Risk Committee at the following email address:

Stuart Purdy, Chair of Audit & Risk Committee – [Stuart.Purdy@Medicalprotection.org](mailto:Stuart.Purdy@Medicalprotection.org) or alternatively [purdy.stuart@gmail.com](mailto:purdy.stuart@gmail.com)

Colleagues also have access to the whistleblowing advice line externally managed by [Protect](#). The advice line provides safe and confidential advice to colleagues globally, should they ever find themselves in a dilemma about what to do if they witness a wrongdoing in the workplace.

The hotline can be accessed by calling +44 (0) 20 31172520, alternatively they can email [whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk).

The **Group Whistleblowing Policy** can be accessed by all colleagues on the MPS intranet and provides further detail of how to raise a concern.



### Combatting Financial Crime

MPS always seeks to comply with relevant financial crime legislation and regulation and work proactively to help protect the organisation, colleagues, and members from financial crime.

MPS operates a **Group Anti-Financial Crime Policy** which sets out MPS's required system and controls to detect and prevent financial crime.

There are specific anti-financial crime requirements which our MPS subsidiaries MPSUW Ltd and MPS Claims Services Ltd, must adhere to because they operate in a regulated environment. Colleagues performing duties for these businesses must also comply with the **MPSUW Ltd and MPS Claims Services Ltd Anti-Financial Crime Policy**

**Responsibility for controlling the risks of fraud and illegal practice rests with all MPS colleagues.**

To report a concern or suspicious activity in relation to any financial crime, colleagues should first inform their line manager and then notify Group Risk & Compliance via [fraud@medicalprotection.org](mailto:fraud@medicalprotection.org)

**Remember:** colleagues should not inform their line manager if the line manager is the subject of the concern or suspicious activity to avoid the risk of tipping off. If in doubt, ask Group Risk & Compliance in the first instance.

MPS response to a colleague committing an act of fraud or illegality will be disciplinary and could result in dismissal.

There are seven key areas of financial crime which colleagues need to be aware of:

- Bribery
- Money Laundering
- Fraud
- Modern Slavery
- Facilitation of Tax Evasion
- Insider Dealing
- Sanctions

#### Bribery

A bribe is an inducement or reward offered, promised or provided (in cash or kind) in order to gain any commercial, contractual, regulatory or personal advantage.

Offering or accepting a bribe is a criminal offence. This includes active bribery (the offering of, promising or giving of a bribe/inducement); passive bribery (the requesting of, agreeing to receive, or acceptance of a bribe/inducement); facilitation payments or inducements to public officials (the giving of a small bribe/inducement to facilitate routine government action). Paying or offering a bribe while acting on behalf of MPS can also expose the organisation to criminal action.

MPS operates in various countries around the world. Colleagues must note there are numerous laws which address appropriate interactions with government officials and employees. These laws cover such areas as political contributions, providing gifts or entertainment to government officials and employees, and lobbying.

The rules for these activities are complex and the penalties for their violation stringent, so colleagues must seek advice from their line manager in the first instance.

**If a colleague has any doubts over appropriate action or other queries, they should contact Group Risk & Compliance.**

### Money Laundering

Money laundering is the process used to convert illegal funds obtained from criminal activities into other assets in such a way as to conceal their true origin so that it appears the money has come from a legitimate or lawful source.

To protect against the crime of money laundering, all colleagues must comply with the following requirements at all times:

- If they know or suspect a source of funds is a consequence of the third party having benefitted from criminal conduct, the colleague must report this suspicion immediately to their line manager (but only if their line manager is not involved or the subject of their suspicions). A suspicious activity report (SAR) must then be raised with Group Risk & Compliance via the dedicated mailbox [fraud@medicalprotection.org](mailto:fraud@medicalprotection.org)
- The colleague must not enter into or become concerned in an arrangement which they know or suspect will facilitate the acquisition, retention, use or control of criminal property by or on behalf of another person.
- The colleague must not inform anyone over and above their line manager and/or Group Risk & Compliance that a suspicious transaction has been reported; or if there is a law enforcement investigation intended or underway. To do so would be likely to prejudice any investigation that may be conducted following the disclosure having been made. This may be considered as Tipping Off, which could be considered a criminal offence.
- Tipping Off is to inform a person suspected of money laundering that they have made a lawful disclosure, i.e., a SAR, or there is a money laundering investigation taking place, where the tipping off is likely either to prejudice any investigation arising from the disclosure or to prejudice the investigation disclosure to the person suspected of money laundering.

**If a colleague has any doubts over appropriate action or other queries, they should contact Group Risk & Compliance in the first instance.**

### Fraud

Fraud is a wilful act committed by an individual or entity by deception, misrepresentation, suppression, cheating or any other fraudulent or other illegal means, thereby causing wrongful loss to someone and wrongful gain to someone. MPS will not tolerate any kind of fraudulent or corrupt business practise, or practise which in any way promotes or supports slavery, servitude, forced and compulsory labour or human trafficking. We will usually pursue all appropriate legal remedies against employees or outside parties involved in fraudulent, corrupt or illegal business practises.

**Responsibility for controlling the risks of fraud and illegal practise rests with all employees.**

**To report a concern or suspicious activity in relation to any financial crime, colleagues must first inform their line manager and then notify Group Risk & Compliance via [fraud@medicalprotection.org](mailto:fraud@medicalprotection.org)**

### Modern Slavery

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

MPS has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains.

MPS is also committed to ensuring that there is transparency in our business dealings, consistent with our disclosure obligations under the Modern Slavery Act 2015.

MPS expects the same high standards from all our contractors, suppliers and other business partners, and as part of our contracting processes must ensure that compliance with law provisions is included and/or there are specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. MPS expects its suppliers will hold their own suppliers to the same high standards.

**If colleagues believe or suspect slavery, forced labour or human trafficking has occurred or that it may occur colleagues must notify their line manager as soon as possible.**

### Facilitation of Tax Evasion

Tax evasion is the illegal non-payment or under-payment by a taxpayer of taxes due to the relevant authorities. As individuals, it is also illegal for us to help anyone evade tax.

It is a criminal offence if a person associated with MPS (such as a colleague or contractor) facilitates the evasion of tax by a third party.

An example of the offence would be if an MPS colleague agreed to misrepresent the amount paid on an invoice, leading to a supplier evading corporate income taxes.

**If colleagues have any suspicions that tax evasion could be occurring, they must notify their line manager as soon as possible.**

**If colleagues would feel more comfortable reporting outside their line management because line management is the subject of the suspicion, concerns should be directed to Group Risk & Compliance.**

### Insider Dealing

Colleagues must not engage in insider dealing, which is a criminal offence.

Insider dealing can be broadly defined as dealing in securities (e.g. shares) based on inside information, that is information that is not yet publicly known, and which would affect the price of securities if it were made public.

It also includes encouraging others to deal based on such information, and disseminating inside information other than in the proper course of employment

An example of insider dealing is, but not limited to, a listed company approaches MPS to amend its indemnity arrangements because it is about to take over another large company, massively expanding its operations. The proposed takeover is not yet public. This is inside information.

### Sanctions

International sanctions (restrictions) are political and economic decisions that are part of diplomatic efforts against states or organisations to bring about a change in those parties' activities or policies. Sanctions are often in response to needing to protect national security interests, in response to breaches of international law or human rights or where democracy is deemed under threat. The restrictions can be lifted when the motivating security concern no longer applies, or when no new threats have arisen.

MPS must only accept payments via a reputable bank, in order to reduce the risk of dealing with sanctioned parties.

All colleagues must:

- Disclose any knowledge or suspicion of a sanctioned activity to Group Risk & Compliance promptly via the [fraud@medicalprotection.org](mailto:fraud@medicalprotection.org) mailbox; and
- Ensure that funds, economic resources and financial services are not made available to a person if there is any knowledge or suspicions that a person or entity has financial sanctions against.

For further information on prevention of Financial Crime, colleagues can access the **Group Anti-Financial Crime Policy** on the intranet or contact Group Risk & Compliance via [fraud@medicalprotection.org](mailto:fraud@medicalprotection.org)

### Conflicts of Interest

A conflict of interest arises when a colleague's personal interests, contacts or outside activities have the potential to impair their ability to perform their work or make objective decisions on behalf of MPS. Even the perception of a conflict of interest may be a problem; in such cases the good reputation of MPS is potentially at risk.

Colleagues must not use their position at MPS, influence, or any company assets or resources in a way that will benefit them personally. This includes their family, friends or the organisations they work with, which could lead to a conflict of interest with MPS or our members. Colleagues must always make sure any perceived, potential, or actual conflict of interest is appropriately managed and disclosed on People First.

MPS operates a **Group Conflicts of Interest Policy** which provides instruction to colleagues on what to do when a conflict arises and clarifies how to declare a conflict.

Note: MPS recognises that colleagues who work together may form close personal relationships. Where this occurs, colleagues should refer specifically to the **MPS Conduct at Work Policy** for details of how and to whom this should be declared.

All colleagues involved in decision-making processes have a duty to identify and disclose actual or potential conflicts of interest. On an annual basis, all colleagues and contractors should routinely declare all private, personal and financial interests relevant to their jobs in relation to:

- Decision-making
- Management of contracts
- Working on a case or claim
- Providing a service to members

All colleagues must complete the Declaration of Extraneous Work and Conflicts of Interests form to declare any known conflicts of interests (actual or potential) as they arise and review on an annual basis.

The Council, the Executive and all directors of MPS group companies are required to register interests outside their employment or engagement with MPS by notifying the Company Secretary direct in writing (by post or email) of any outside interests (including, but not limited to, actual or potential conflicts of interest).

### Supplier Relationships and Third-Party Relationships

MPS expects suppliers to conduct their business lawfully and in accordance with the principles set out in our Third Party Code of Conduct, which summarises the values that apply to supplier third parties, providing a set of governing principles for ethical behaviour when interacting with MPS or when acting on its behalf.

If colleagues buy goods or services on behalf of MPS, they must disclose any commercial or personal conflict of interest, giving details of any ownership or other financial interest that might appear to reduce their ability to make objective decisions.

Colleagues must declare any conflicts of interest (actual or potential) at the outset of any procurement activity in relation to the procurement.

### **Personal Remuneration for Opportunities arising through a Colleague's position with MPS**

Colleagues must never exploit their position with MPS for personal gain, and company resources must only be used for company purposes.

### **Secondary Employment and Other Outside Activities**

MPS encourages and supports participation in public duties, such as membership of voluntary and representative work as members of professional committees. Colleagues must make sure that these or other outside activities do not create a real or perceived conflict of interest.

In the case of paid employment outside MPS, colleagues must get the permission of their head of department, confirmed in writing by the Executive Director – People and Culture BEFORE entering such employment.

Approval will only be given if:

- It will not cause a real or apparent conflict of interest
- It will not impact upon other obligations under any other applicable laws e.g. work time directive
- It does not interfere with the colleague's ability to do their job, conflict with their responsibilities, or compromise their objectivity in making decisions for MPS
- Approval will not be given for paid employment with any competitor or any organisation, or which has a link with a competitor

For further information on identifying, declaring and managing actual or potential conflicts, colleagues should consult the **Group Conflicts of Interest Policy**.

### Managing Claims and Cases

Colleagues must always act with integrity, considering what impact the decisions taken will have on our members and the membership fund.

MPS seeks to be ethical in its core activity of managing claims and cases on behalf of members. In the jurisdictions in which it operates, the civil courts and medical/dental councils are run on adversarial lines.

It is MPS role within that system “to protect, support and safeguard the character and interests” of members and we will do this to our utmost for individual members, provided there are enough merits to the member’s case. However, Council always retains discretion and the ability to consider the individual circumstances of a case.

Claims handlers should be alert to the ethical issues arising in managing claims and be ready to seek advice, when presented with difficult dilemmas from their line manager or head of department.

MPS believes in fairness as an expression of what members collectively want from MPS. Fairness also means that members should receive broadly equivalent treatment within the overall discretionary framework. To this end, MPS issues policies setting out its general position on support in certain areas that are frequently controversial.

In all types of cases, conflicts of interest may arise between members. If case handlers are in doubt as to how to deal with these, they should refer to their line manager to guide as required, or for further escalation to Head of/Escalation Team as appropriate. Colleagues should be aware of and are required to follow the requirements of their regulating body regarding conflicts of interests and ethical issues.

### Fair Competition

MPS supports free and fair competition and strives to deal with all parties fairly and equitably. MPS will not make untrue or misleading statements about competitors.

Laws dealing with competitive practice prohibit anti-competitive behaviour and behaviour that gives an unfair advantage to MPS. They include rules regarding the sharing of information (about price but also about other matters) with outside parties.

All colleagues must ensure they understand what information can or cannot be shared, and with whom, before sharing any information with others. These are very sensitive and complex areas of the law and colleagues are encouraged to seek advice from General Counsel if they have any questions about what is and is not permissible.

Examples of potentially unlawful anti-competitive behaviour include, but are not limited to:

- Warning a competitor or potential competitor to “stay off our patch”.
- Agreeing not to compete in a territory in return for another organisation not competing with us elsewhere.
- Having any discussions with our competitors about subscriptions or pricing, possible subscription or pricing changes, discounts, marketing plans or terms of business.
- Discussing pricing of our suppliers’ services with others in the same market as us.
- Discussing our products or marketing plans with competitors.
- Agreeing with competitors to boycott members or suppliers.

### Gifts & Hospitality

Gifts, incentives and hospitality received from and offered to suppliers, members or any external parties with whom MPS does business may seem harmless, but they can create a real or perceived sense of obligation. They can also breach anti-bribery and corruption laws.

MPS operates a **Group Gifts & Hospitality Policy** which provides instruction on what to do where offered, or offering, gifts, incentives or hospitality and clarifies the approvals process for the giving or receiving of gifts, incentives and hospitality.

The offer and acceptance of gifts, incentives and hospitality could leave MPS open to accusations of unfairness, partiality or bias and colleagues/MPS to criminal prosecution. It can also place MPS ethical reputation at risk. Gift giving and receiving is actively discouraged.

Gifts, Hospitality and incentives must never be offered or accepted where they are made with the intention of influencing a third party to obtain or retain business or a business advantages, do not comply with local law or inappropriate considering the reason for the gift, type, value and timing.

For further detail on unacceptable gifts, colleagues should consult the **Group Gifts & Hospitality Policy**. Before accepting or offering a gift or invitation, colleagues must ensure they are complying with the Policy and understand any restrictions which may apply to them or the potential recipient.

All gift &/or incentive received over £30 (or local currency) must be passed to the MPS Corporate Social Responsibility (CSR) Committee to be used in future events for the purposes of raising charitable donations. Gifts and incentives received valued under £30 may still be kept, however colleagues may choose to donate to the CSR Committee.

There may be limited exceptions where the gift is perishable – by this it is meant the item needs to be consumed within a limited time as it will spoil quickly. This includes for example the contents of a fresh fruit basket or fresh flowers. It does not include for example a bottle of wine as this ordinarily would not perish quickly.

Gifts, Hospitality and incentives **must never be offered** or accepted where they are given during any **contract review or tender process** and if given during a **claim or case** before its outcome is decided.

Colleagues should refer to the **Group Gifts & Hospitality Policy** which sets out in detail the criteria for the giving, accepting and recording of gifts, incentives or hospitality.

If colleagues are still unclear, they should consult their line manager, or Group Risk & Compliance.



### Data Privacy

MPS handles a significant amount of personal data about our members, staff, and a range of third parties we interact with or receive information about, such as claimants, complainants, experts and contractors. All colleagues are responsible for protection all such information from deliberate, unintentional or unauthorised access, modification, destruction and disclosure.

MPS operates a **Group Data Protection Policy** which sets out the basis upon which MPS will process and protect any personal data we collect, or that is provided to us by other sources.

To ensure compliance with this, colleagues must abide by the following **6 principles**:

1. Personal Data must be processed fairly, lawfully and in a transparent manner
2. Personal data must be obtained only for specified, explicit and legitimate purposes, and not processed in any manner incompatible with those purposes
3. Personal data must be adequate, relevant and limited to what is necessary for in relation to the purposes for which it is processed
4. Personal data must be accurate and kept up to date
5. Personal data must not be kept longer than in necessary for the purposes for which it was obtained
6. Personal data must be processed in a manner that ensures the appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

For further information on Data Privacy, colleagues can access the **Group Data Protection Policy** on the intranet or discuss with General Counsel.

### Security of Information and Records Management

Safeguarding the integrity of company records is important. Regulators, auditors and members rely on the accuracy of company accounting and other records. MPS operates a **Group Information Security Policy** which describes how MPS protects information from a wide range of threats.

In playing their part in managing information security, all colleagues must:

- Exercise great care in creating and maintaining complete, accurate and timely records. Information contained in company records must accurately reflect the underlying activity or transaction.
- Ensure that information and records that are created are kept safe from loss or damage, while secured from unauthorised access, and are retained in accordance with our document retention policy.
- Safeguard the integrity of MPS information and records, including all forms of written and computerised information.

MPS company's financial and accounting records must be accurate. Compliance with MPS accounting and internal control procedures is essential. The following is prohibited:

- Deliberately or recklessly making, or causing someone else to make, false, misleading or incomplete entries in any company account, expense statement, purchase order or other record.
- Deliberately or recklessly omitting, or causing someone else to omit, any material information required to ensure that a company account, expense statement, purchase order or other record is accurate and not misleading.
- Altering, hiding or destroying, or causing someone else to alter, hide or destroy any information to produce false or misleading records or reports or to impede an internal or external investigation.
- Interfering, or causing someone else to interfere, with the performance of an internal or external audit.

It is critical to MPS's reputation that the information held about members is used only for MPS purposes. Colleagues must not under any circumstances reference member information for any personal purpose on your own behalf or for others. There are various public sources to which colleagues can legitimately refer anyone seeking information about a health professional. For example, the website of the health professionals' regulator, the usual search engines and [specialistinfo.com](http://specialistinfo.com).

For further information on Information Security, colleagues can access the **Group Information Security Policy** on the intranet.

### Corporate Social Responsibility (CSR)

MPS is a member focused, responsible business which always aims to meet the highest standards of ethical and professional behaviour. Our CSR Vision is to operate in an ethical and sustainable way; deal with our environmental and social impact; and encourage colleague sense of belonging.

The **MPS CSR Strategy** is designed to create longevity and stability for our members, colleagues and MPS.

#### People

The MPS Council and Executive recognise the moral case for change as well as the business benefits a diverse workforce can bring for MPS and the wider diverse healthcare profession. Our commitment is articulated through the **MPS Diversity & Inclusion (D&I) Strategy**.

We treat all people with respect. We ensure access to employment, development and promotion within MPS is free from discrimination on the grounds of gender, gender reassignment, sexual orientation, pregnancy and maternity, marital status, creed, colour, race, religion, age, ethnic origin, nationality or disability (which can include both physical and mental conditions).

We always aim to get a diverse pool of candidates for any recruitment that we undertake and seek to achieve a balanced shortlist of candidates. We use agencies who specialise in putting forward a diverse range of candidates to shortlist.

We operate various colleague networks to promote and support diversity and inclusion including our Diversity & Inclusion Forum, Women's Inspirational Network and LGBTQIA+.

We seek to ensure our reward across MPS is fair, equitable, measurable and transparent. We publish our gender pay report annually.

We support the development of colleagues through initiatives such as coaching and

#### Environment

MPS seeks to demonstrate leadership in our efforts to reduce our adverse impact on the

upward mentoring and offer an Emerging Senior Leaders Development Programme to build a strong commercial, technical and leadership capability in readiness for future senior leadership roles; and a Leadership Fundamentals programme designed to develop leadership capability across all levels of the organisation.

#### Health & Safety

MPS seeks to provide a secure, safe and healthy environment for all employees, as well as managing risks to members, contractors and members of the public whilst on MPS premises.

We encourage high standards of health and safety and remind colleagues through training how they must co-operate with MPS requirements so as we are compliant with our statutory duties.

#### Community and Charity

MPS aims to be a positive contributor in our communities and regarded as a great place to work.

We nominate charities to be the focus for our fundraising efforts and donations. We hold charity events and activities to encourage colleagues to participate in fundraising events which are connected with the nominated charities.

We offer organisational support into our local communities, sharing our time and skills, by offering all colleagues the opportunity to volunteer one day per year to local causes that matter to us and support Our Purpose.

MPS does not authorise charitable partnerships or donations with or for individuals; political organisations; or projects which favour the propagation of a religious belief or where participants/beneficiaries are required to belong to a particular religion.

environment, both in terms of our operations and through our role as an investor on behalf of members.

### Operations

MPS is committed to minimising the environmental impact of our day-to-day operations and continually improve our energy efficiencies and waste management. We recognise the need to protect the natural environment and believe that keeping our environment clean and unpolluted is a benefit to us all.

MPS seeks to follow best practice when disposing of waste and to protect the environment in accordance with our legal obligations.

MPS encourages our people to consider the environment at all times, by actively encouraging colleagues to minimise the use of natural resources (such as paper and water) and energy use, including business travel and to recycle waste wherever possible.

### Investments

MPS duty is to secure the funds members entrust to MPS so it can meet its obligations to

them and they, in turn, are able to compensate their patients.

MPS has an **Environmental, Social and Governance (ESG) Investing Policy** which defines MPS requirements for ensuring ESG investing is incorporated into the investment strategy and continuous monitoring and reporting of ESG is carried on throughout the duration of each of the investments within the portfolio.

In the event colleagues receive a query from a member about MPS Investment Policy, please direct this to the Executive Director – Finance to arrange a response.

## Further Assistance on this Code

If any general advice or guidance is needed as to the application of this Code, colleagues should in the first instance speak with their line manager or where they are unable to help speak to Group Risk & Compliance.

## Appendix 1 – Additional guidance to applying the Code

### Conflicts of Interests

My partner is the CEO of a software company that is bidding for a contract with MPS. Do I need to disclose this connection?

**Yes. This could create a conflict of interest and should be reported to your line manager who will determine how the conflict should be managed.**

I have been asked to serve on the board of directors of a non-MPS corporation that supplies services to MPS. Do I need to disclose this?

**Yes, this is an external engagement and approval is required from your line manager.**

### Gifts & Hospitality

I have been invited for lunch by a member before the case the outcome has been decided. What should I do?

**Reject the hospitality and report to your line manager as it is inappropriate given the timing.**

I have been offered a bottle of wine valued at £50 by a current supplier. Can I accept it and keep it?

**You may accept the wine, if it is not during a tender process. The wine must be gifted to the Corporate Social Responsibility Committee as it valued at more than £30.**

### Whistleblowing

Colleagues can raise any concerns they may have about illegal or improper behaviour without fear of victimisation, discrimination, or disadvantage.

### Financial Crime

A current MPS Supplier is offering me a cash payment if I extend their contract. What should I do?

**This is bribery. You must reject this and report this to your line manager.**

A major company which MPS invests in is being driven to bankruptcy, you learn this because of your position at MPS. You know that your friend has shares in this company. Can I tell my friend?

**No, you cannot do this, as this would be insider dealing. This information must remain confidential.**

### Diversity and Inclusion

My manager makes jokes about other ethnic groups on a regular basis, and I feel uncomfortable. What can I do?

If you feel able to do so, address it with your manager directly in a private setting; explaining how the jokes make you feel, how their words are perceived and request they stop. If you don't feel comfortable, or the feedback has not had the desired impact, you can provide feedback to your managers' manager or alternative appropriate divisional senior manager. In situations where there is not appropriate you can contact a People & Culture representative who can explore further options with you such as raising a Grievance. If you prefer to raise confidentially for advice, you can contact the Include Me advice email address [IncludeMe@medicalprotection.org](mailto:IncludeMe@medicalprotection.org)

### **Fair Competition**

A competitor's representative suggests MPS sell indemnity only in certain regions of a country, whereas the competitor would sell its insurance products in other regions of the same country. Is this arrangement acceptable?

**No. This is not permissible as it would violate laws prohibiting market diversion. You should seek advice from General Counsel.**

### **Security of Information and Records Management**

A member during a case has asked for information on a fellow member. Can I add provide this information?

**No. This is strictly prohibited and should be reported to your line manager.**