

# Ethical Code of Conduct Policy Statement

Behaving ethically is essential to the way we operate and the success of the business with the overarching value of “Integrity” guiding our behaviours and standards. We are committed to complying with legislative and other requirements in particular our customers’ ethical code of conducts.

This commitment will include:

- making decisions based on this commitment aligned to our values
- promoting awareness and understanding of ethical issues
- promoting moral standards and behaviour
- prohibiting the use of black lists in the selection of potential personnel
- ensuring employees understand their duties and obligations without harassment, victimisation or assault
- ensuring subcontractors demonstrate compliance with our ethical code of conduct policy and that of our customers

## **Anti-Bribery, Corruption, Fraud and Malpractice**

We will not engage in bribery or any form of unethical inducement or payment. All employees are required to avoid any activities that might lead to, or suggest, a conflict of interest with the business of the Company.

## **Gifts and Hospitality**

We will raffle and/or donate to charity all gifts received (e.g. Christmas, etc.)

## **Respect for Human Rights**

We will adhere to the principles of human rights and ensure that everyone is protected and treated fairly.

## **Anti-Harassment and Bullying**

We are committed to promoting a harmonious working environment. All members of staff have the right to be treated with respect and dignity and are entitled to work in an environment free from harassment, victimisation and bullying. We prohibit all forms of harassment and bullying whether amounting to unlawful conduct or not and this includes harassment, bullying or discrimination.

## **Reporting, Disclosure and Whistleblowing**

We encourage people to raise genuine concerns about malpractice directly with the Managing Director. Similarly, all other concerns including conflicts of information in handling customer information should also be reported directly to the Managing Director, or alternatively to the Board via the Company Secretary or to one of the Non-Executive Board Directors.

## **Managing and Monitoring Risk**

The Managing Director will lead monitoring and reviews of the business risk register which will include bribery risks. The business risk register is a key component of our certified ISO 9001 certification. Appropriate measures will be introduced as appropriate to mitigate risk and respond to any instances arising.

## **Training and Communication**

Workers are prioritised for formal training based on their level of authority and interaction with customers and suppliers. This policy is communicated to all workers and the supply chain through induction and contracts, and available to all other interested parties through our website and intranet.

The Managing Director will establish appropriate steps if any instance of bribery or corruption is identified. Appropriate resources will continually be made available to ensure that this policy is implemented in full through annual objectives, managerial vigilance and regular auditing and review.

This policy statement may be amended, monitored and added to from time to time and a copy will be available to all employees, contracted staff on site and interested parties through our website.

*Malcolm McDermott*