

1. THE PURPOSE AND SCOPE OF THIS POLICY

The purpose of this policy is to set out the Company's approach to ethical business and provide a guide to proper business conduct for all employees. The policy seeks to ensure that all employees are aware of their responsibilities, both individually and collectively with regard to the Company's ethics and to detail the expectations of employees and customers to being treated fairly and in accordance with good business practices.

All employees are responsible for reading this policy and complying with the same

2. EMPLOYEE'S COMMITMENT TO ETHICS

All employees are expected to comply with all laws and rules affecting the business of the Company and to act with fairness, honesty and respect.

The Company expects each employee to:

- Disclose any potential conflicts of interest;
- Assist the Company in providing a safe, drug-free and alcohol-free working environment;
- Act in accordance with the Company's Equal Opportunities Policy and treat everyone with respect and consideration, regardless of age, disability, gender, race, religion etc;
- Demonstrate appropriate standards of integrity, truthfulness and honesty;
- Conduct themselves professionally and with fairness and impartiality;
- Comply with the Company's Anti-Corruption & Bribery Policy and never solicit or receive favours, gifts, loans or other benefits;
- Adhere to the Company's Health and Safety Statement at all times;
- Not misuse the Company's confidential information and not disclose confidential information without authorisation; and
- Use the Company's resources for business purposes only.

3. COMPANY'S COMMITMENT TO ETHICS

The Company is committed to ensuring:

- Professional reputations are built on merit and the Company's capabilities;
- The health and safety of employees;
- An environment and culture of openness, trust and integrity;
- A customer's needs and objectives are determined and met;
- It conducts business with respect and consideration for the environment; and
- Its confidential information is not misused or disclosed without authorisation.

4. RAISING A CONCERN OR A COMPLAINT

Any employee who wishes to raise a concern or complaint under this policy should in the first instance discuss the matter with their line manager. If this is not appropriate an employee should speak to Human Resources or a Director.

Employees are also referred to the Company's Grievance Procedure.

5. BREACHES OF THIS POLICY

We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Procedure.