



Lancaster Fastener Co Ltd
Threadforming Screw Specialists

Code of Business Conduct



PEOPLE



ENVIRONMENT



ETHICS

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Company Overview



Lancaster Fastener; a brand synonymous with exceptional standards of quality and customer service to fastener distributors across the globe.

Lancaster Fastener is recognised throughout the international distribution trade as a specialist importer and stockist of small diameter (12mm and below) industrial threaded fasteners. Trading within the fastener industry for over 30 years, Lancaster Fastener has successfully developed a brand that is synonymous with exceptional standards of quality and customer service.

Product ranges are sourced from quality assured manufacturers and subsequently supplied to a network of fastener distributors in 43 countries worldwide.

Lancaster Fastener supplies many of the leading fastener distribution groups as well as offering support to many of the smaller distribution companies throughout the world. Lancaster's position in the market forms an essential supporting stock interface between the distributor and the Asian manufacturer, reacting largely to the infill demands of the global fastener industry.



Mission Statement

To be respected as a leading international importer and distributor of industrial fasteners.

This will be achieved through continuing to develop the quality of the 'Lancaster' brand, expanding product ranges, increasing efficiency and elevating the superior level of customer service already offered to customers.



Introduction to the Code

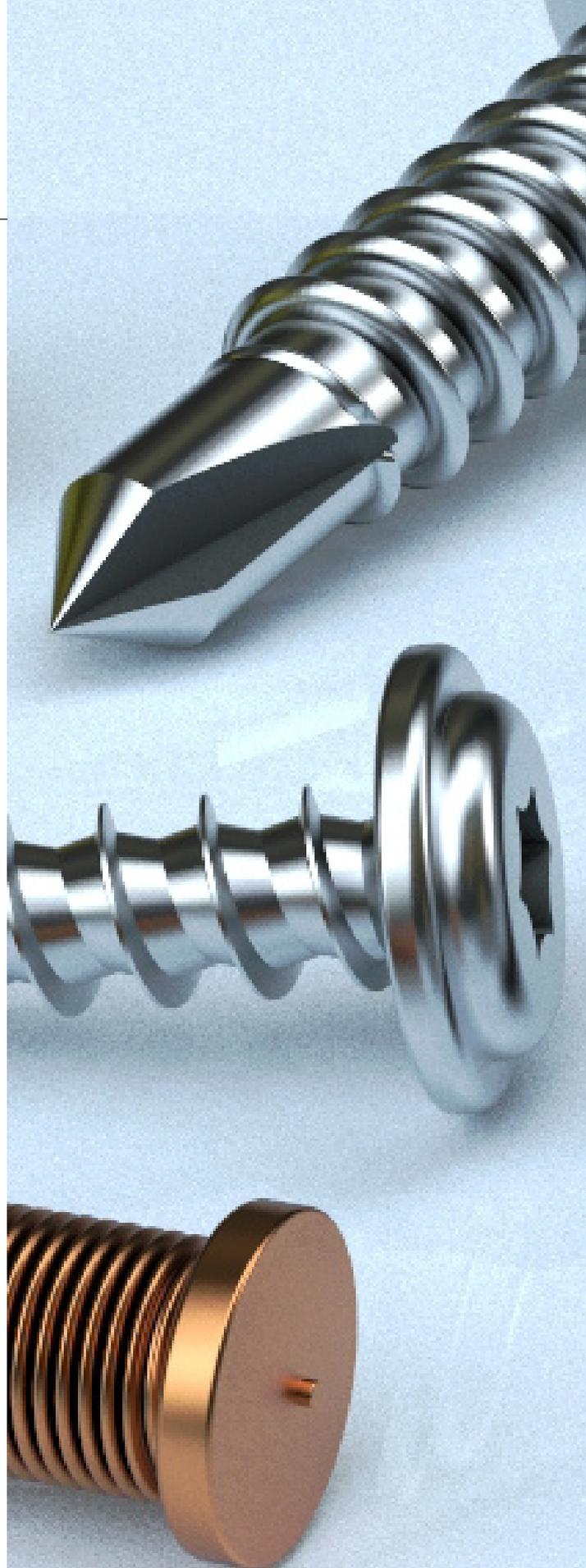
This Code is a summary of the principles and standards of business conduct that we expect from all of our employees, wherever they might be based. In addition the Company has a Business Ethics and Responsible Behaviour Policy which should also be referred to.

The Code should be read by all employees and should be used as the basis for dealing with fellow employees, customers, suppliers, contractors and stakeholders. When appropriate, a copy of this Code can be provided to outside organisations to ask that they comply with our standards and principles.

Lancaster Fastener is committed to complying with the laws and regulations of all the countries in which we operate, and each employee is responsible for understanding and following the applicable laws.

All employees have a responsibility to:

- Conduct business fairly, honestly and with respect and integrity
- Prevent compliance violations and protect the Company's reputation by acting in an ethical manner
- Commit to eradicating unethical business practices including bribery, fraud, corruption and human rights abuses, such as modern slavery and child labour
- Continually enhance knowledge of and comply with all laws, regulations and policies applicable under the Code and the locations where we operate
- Actively support and promote corporate social responsibility
- Report any violations or potential violations of the Code without fear of retaliation



Compliance with Laws and Regulations

As an international company with relationships in many countries around the world, Lancaster Fastener is committed to maintaining high standards of business conduct.

We expect all of our employees to conduct our business in an ethical manner and within applicable laws, rules and regulations. You must respect and abide by the laws of the cities, states and countries in which our Companies operate. All transactions between our Group Companies must meet all applicable legal requirements. Failure to abide by the laws can result in substantial fines, imprisonment and restrictions on the Company's ability to carry out its business.

Working Hours

Lancaster Fastener will ensure that all of its employees work in compliance with all applicable laws and industry standards with regard to working hours, rest breaks, holidays and statutory leave.

Child Labour

Lancaster Fastener prohibits the use of child labour and all minimum age regulations in all of the countries in which we operate will be strictly observed.

Forced Labour

Lancaster Fastener will only employ workers who are legally authorised to work within their operations. All work is voluntary and all employees are free to leave work or terminate their employment upon reasonable notice.



Anti-Bribery

Lancaster Fastener does not tolerate any form of bribery.

Anyone associated with the Company must not offer, give or receive bribes or any form of corrupt payments.



Modern Slavery

Lancaster Fastener is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring, as far as we are able, that our supply chains are free from slavery and human trafficking.

We undertake due diligence when evaluating new suppliers and regularly review our existing suppliers.



Environment

Lancaster Fastener is committed to complying with all applicable environmental legal requirements and to protecting the environment. Employees and business partners are expected to comply with all requirements and to report any incidents or conditions that might result in a violation of a law or Company policy.

All employees have a personal and collective responsibility to use resources efficiently and to minimise the impact of our operations on the environment.

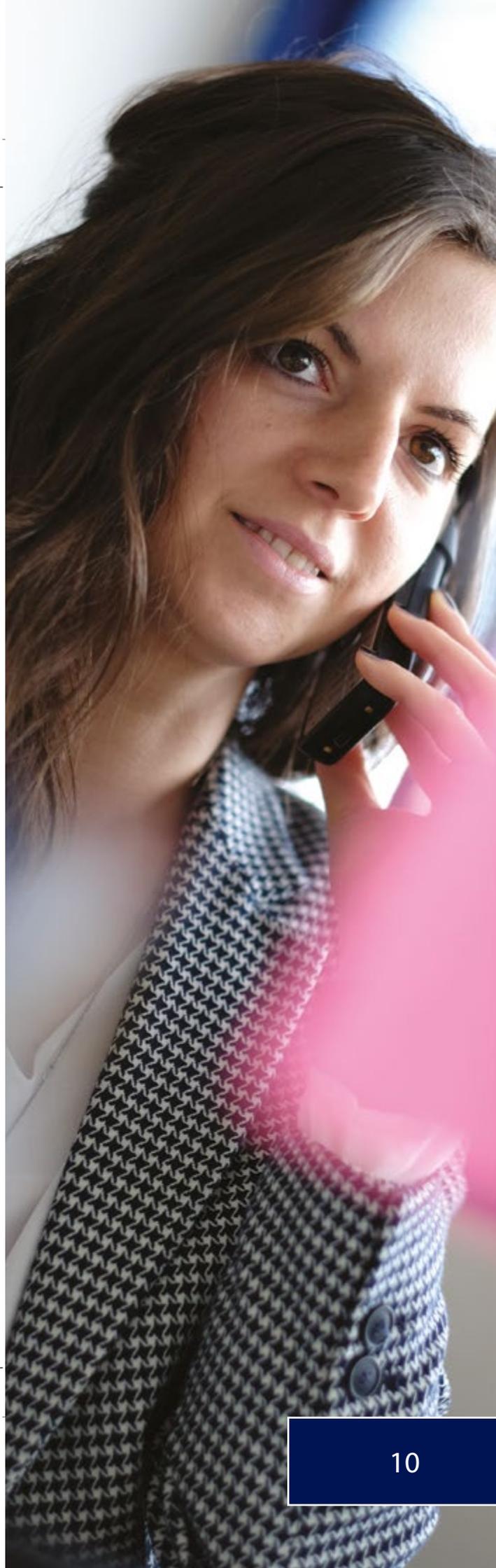


Health and Safety

Lancaster Fastener is also committed to providing a safe and healthy working environment.

Complying with safety rules and procedures is an essential part of our working practices and we aim to prevent accidents by understanding the risks within our business. Once these risks are identified and understood, every effort is made to minimise them through effective and robust management systems.

Every employee has responsibility for maintaining a safe and healthy workplace for all employees by following health and safety rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions as stated in the Company's Health and Safety Policy.



Product Quality

Lancaster Fastener is committed to providing safe and innovative products to its customers.

The Company also carries out extensive product testing and quality assurance processes to ensure that any non-compliant products are identified at the earliest possible stage. We test product under the Restriction of Hazardous Substances Regulations (RoHS).

Under the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) legislation that came into force in 2007, we communicate with our suppliers and our customers to ensure that any legislated chemicals are registered and monitored as required. As the chemicals list is updated frequently, we are in regular correspondence with our supply chain to remain compliant with this legislation.



Diversity, Equal Opportunities and Respect

In accordance with our Equal Opportunities Policy the Company is committed to providing and maintaining a working environment that is fair, tolerant and respectful.

These values help to create a strong, diverse team all working together in a mutually beneficial environment.

The Company is firmly committed to providing equal opportunities in all aspects of employment and will not tolerate any discrimination or harassment of any kind, as stated in the Harassment Policy, the Equal Pay Policy and the Dignity at Work Policy.



Reporting Concerns

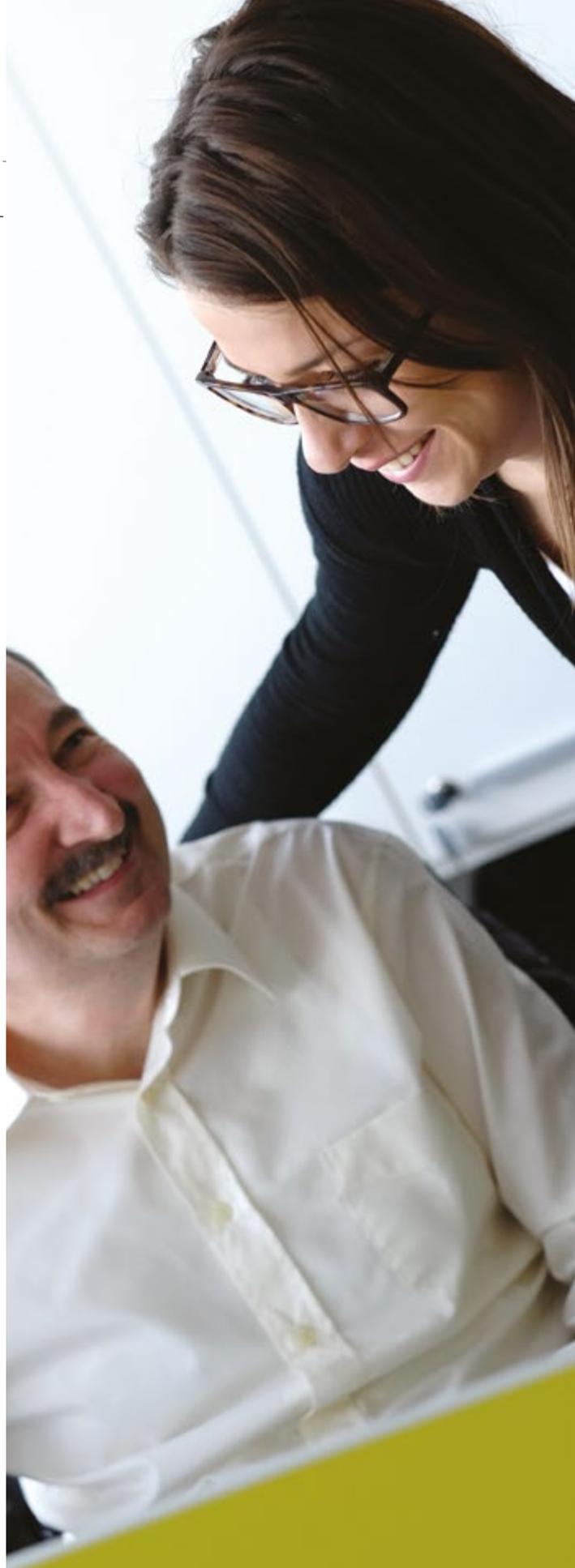
All employees have an obligation to report any potential or suspected violation of this Code.

The Code cannot cover every situation that may occur but there are a number of ways that you can seek advice and support including:

- Your manager
- An alternative manager
- The Human Resources Department
- The Whistle-blowing Service - Safecall

The Company does not tolerate any sort of retaliation against any employee who reports a complaint in good faith.

The Company's Whistle-blowing Policy should be referred to in order to understand the procedures and processes that are available. The service is fully confidential.



Anti-Bribery Policy

Introduction

The Company is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. This policy outlines the Company's position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010. The Company will not tolerate any form of bribery by, or of, its employees, agents or consultants or any person or body acting on its behalf. Senior management is committed to implementing effective measures to prevent, monitor and eliminate bribery.

Scope Of This Policy

The policy applies to all employees and officers of the Company, and to temporary workers, consultants, contractors, agents and subsidiaries acting for, or on behalf of, the Company ('associated persons') within the UK and overseas. Every employee and associated person acting for, or on behalf of the Company is responsible for maintaining the highest standards of business conduct. Any breach of this policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of the Company.

The Company may also face criminal liability for unlawful actions taken by its employees or associated persons under the Bribery Act 2010. All employees and associated persons are required to familiarise themselves and comply with this policy, including any future updates that may be issued from time to time by the Company.

The Bribery Act is in force from 1 July 2010. This policy covers:

- The main areas of liability under the Bribery Act 2010
- The responsibilities of employees and associated persons acting for, or on behalf of the Company
- The consequences of any breaches of this policy

Bribery Act 2010

Under the Bribery Act 2010, a bribe is a financial or other type of advantage that is offered or requested with the:

- Intention of inducing or rewarding improper performance of a function or activity
- Knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.

A relevant function or activity includes public, state or business activities or any activity performed in the course of a person's employment, or on behalf of another company or individual, where the person performing that activity is expected to perform it in good faith, impartially, or in accordance with a position of trust.

A criminal offence will be committed under the Bribery Act 2010 if:

- An employee or associated person acting for, or on behalf of, the Company, offers, promises, gives, requests, receives or agrees to receive bribes
- An employee or associated person acting for, or on behalf of, the Company offers, promises or gives a bribe to a foreign public official with the intention of influencing that official in the performance of his/her duties (where local law does not permit or require such influence)
- The Company does not have the defence that it has adequate procedures in place to prevent bribery by its employees or associated persons

All employees and associated persons are required to comply with this policy, in accordance with the Bribery Act 2010.



Anti-Bribery Policy Continued

What Is Prohibited

The Company prohibits employees or associated persons from offering, promising, giving, soliciting or accepting any bribe. The bribe might be cash, a gift or other inducement to, or from, any person or company, whether a public or government official, official of a state-controlled industry, political party or a private person or company, regardless of whether the employee or associated person is situated in the UK or overseas. The bribe might be made to ensure that a person or company improperly performs duties or functions to gain any commercial, contractual or regulatory advantage for the Company in either obtaining or maintaining Company business, or to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

This prohibition also applies to indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance, for example, through consultants, contractors or sub-contractors, agents or sub-agents, sponsors or sub-sponsors, joint-venture partners, advisors, customers, suppliers or third parties.

Records

Employees and, where applicable, associated persons, are required to take particular care to ensure that all company records are accurately maintained in relation to any contracts or business activities, including financial invoices and all payment transactions with clients, suppliers and public officials.

Due diligence should be undertaken by employees and associated persons prior to entering into any contract, arrangement or relationship with a potential supplier of services, agent, consultant or representative.

Employees and associated persons are required to keep accurate, detailed and up-to-date records of all corporate hospitality, entertainment or gifts accepted or offered.

Working Overseas

Employees and associated persons owe a duty to the Company to be extra vigilant when conducting international business.

Procedure

Employees and associated persons are required to cooperate with the Company's risk management procedures and to report suspicions of bribery to a Company Director. While any suspicious circumstances should be reported, employees and associated persons are required particularly to report:

- Close family, personal or business ties that a prospective agent, representative or joint-venture partner may have with government or corporate officials, directors or employees
- A history of corruption in the country in which the business is being undertaken
- Requests for cash payments
- Requests for unusual payment arrangements, for example, through a third party
- Requests for reimbursements of unsubstantiated or unusual expenses
- A lack of standard invoices and proper financial practices

If an employee or associated person is in any doubt as to whether or not a potential act constitutes bribery, the matter should be referred to a Company Director.



Anti-Bribery Policy Continued

Facilitation Payments

The Company prohibits its employees or associated persons from making or accepting any facilitation payments. These are payments made to government officials for carrying out or speeding up routine procedures. They are more common overseas. Facilitation payments are distinct from an official, publicly available fast-track process. Facilitation payments, or offers of such payments, will constitute a criminal offence by both the individual concerned and the Company under the Bribery Act 2010, even where such payments are made or requested overseas. Employees and associated persons are required to act with greater vigilance when dealing with government procedures overseas.

Procedure

Where a public official has requested payment, employees or associated persons should ask for further details of the purpose and nature of the payment in writing. If the public official refuses to give these, this should be reported immediately to a Company Director.

If the public official provides written details, a Company Director will consider the nature of the payment. Local legal advice may be sought by the Company.

If it is concluded that the payment is a legitimate fee or is permitted locally, the Company will authorise the employee to make the payment. Where the Company Director considers that the request is for a facilitation payment, the employee or associated person will be instructed to refuse to make the payment and notify the public official that the employee or associated person is required to report the matter to the Company and the UK embassy.

The Company will seek the assistance of the relevant employee in its investigation and may determine that the matter should be referred to the prosecution authorities.

If an employee or associated person has any other concerns about the nature of a request for payment, he/she should report it to a Company Director using the reporting procedure set out in this policy, and in accordance with the Company's whistle-blowing policy.

Corporate Entertainment, Gifts, Hospitality and Promotional Expenditure

The Company permits corporate entertainment, gifts, hospitality and promotional expenditure that is undertaken:

- For the purpose of establishing or maintaining good business relationships
- To improve the image and reputation of the Company
- To present the Company's services effectively

Provided that it is:

- Arranged in good faith
- Not offered, promised or accepted to secure an advantage for the Company or any of its employees or associated persons or to influence the impartiality of the recipient

The Company will authorise only reasonable, appropriate and proportionate entertainment and promotional expenditure.

This principle applies to employees and associated persons, whether based in the UK or overseas.



Anti-Bribery Policy Continued

Procedure

Employees and, where relevant, associated persons should submit requests for proposed hospitality and promotional expenditure well in advance of proposed dates to a Company Director.

Employees are required to set out in writing:

- The objective of the proposed client entertainment or expenditure
- The identity of those who will be attending
- The organisation that they represent
- Details and rationale of the proposed activity

The Company will approve business entertainment proposals only if they demonstrate a clear business objective and are appropriate for the nature of the business relationship. The Company will not approve business entertainment where it considers that a conflict of interest may arise or where it could be perceived that undue influence or a particular business benefit was being sought.

Any gifts, rewards or entertainment received or offered from clients, public officials, suppliers or other business contacts should be reported immediately to a Company Director. In certain circumstances, it may not be appropriate to retain such gifts or be provided with the entertainment and employees and associated persons may be asked to return the gifts to the sender or refuse the entertainment, for example, where there could be a real or perceived conflict of interest. As a general rule, small tokens of appreciation, such as flowers or a bottle of wine, may be retained by employees.

If an employee or associated person wishes to provide gifts to suppliers, clients or other business contacts, prior written approval from a Company Director is required, together with details of the intended recipients, reasons for the gift and business objective.

Employees and, where applicable, associated persons must supply records and receipts, in accordance with the Company's expenses policy.

Charitable and Political Donations

The Company considers that charitable giving can form part of its wider commitment and responsibility to the community. The Company supports a number of charities that are selected in accordance with objective criteria, following a risk assessment. The Company may also support fundraising events involving employees.

Risk Management

The Company has established detailed risk management procedures to prevent, detect and prohibit bribery. The Company will conduct risk assessments for each of its key business activities on a regular basis and, where relevant, will identify employees or officers of the Company who are in positions where they may be exposed to bribery.

Procedure

The Company will identify high-risk areas, for example projects undertaken in high-risk countries, tenders for work and those working on high-value projects.

The Company will:

- Regularly monitor 'at risk' employees and associated persons
- Regularly communicate with 'at risk' employees and associated persons
- Undertake extensive due diligence of third parties and associated persons
- Communicate its zero-tolerance approach to bribery to third parties, including actual and prospective customers, suppliers and joint-venture partners



Anti-Bribery Policy Continued

Reporting Suspected Bribery

The Company depends on its employees and associated persons to ensure that the highest standards of ethical conduct are maintained in all its business dealings. Employees and associated persons are requested to assist the Company and to remain vigilant in preventing, detecting and reporting bribery.

Employees and associated persons are encouraged to report any concerns that they may have to a Director as soon as possible. Issues that should be reported include:

- Any suspected or actual attempts at bribery
- Concerns that the other employees or associated persons may be being bribed
- Concerns that other employees or associated persons may be bribing third parties, such as clients or government officials

Employees or associated persons who report instances of bribery in good faith will be supported by the Company. The Company will ensure that the individual is not subjected to detrimental treatment as a consequence of his/her report. Any instances of detrimental treatment by a fellow employee because an employee has made a report will be treated as a disciplinary offence. An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, employees and associated persons should not agree to remain silent. They should report the matter to a Director.

Action By The Company

The Company will fully investigate any instances of alleged or suspected bribery. Employees suspected of bribery may be suspended from their duties while the investigation is being carried out. The Company will invoke its disciplinary procedures where any employee is suspected of bribery, and proven allegations may result in a finding of gross misconduct and immediate dismissal. The Company may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of, the Company who are found to have breached this policy.

The Company may also report any matter to the relevant authorities, including the Director of Public Prosecutions, Serious Fraud Office, Revenue and Customs Prosecutions Office and the Police. The Company will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

The Company reserves the right to amend and update this policy as required.



Business Ethics and Responsible Behaviour Policy

Lancaster Fastener, from here on in 'the Company', is a business founded on mutual trust and confidence. These attributes have to be earned and sustained over a long period by the successive generation of people who work in the business and can be lost overnight by irresponsible or unethical behaviour. The purpose of this code is to set out in some detail the principles which must be observed throughout the Company. They fall under three general principles – integrity, loyalty and self-respect – basic qualities that we expect from every employee from the Board to the newest employee. They also include certain corporate values to which we subscribe and which must govern our business ethics. We all must take responsibility to ensure that these behaviours and ethics are upheld, deliberate failure to do so may result in disciplinary action and the result of which, in serious circumstances, may lead to the dismissal of a member of staff. It is therefore important that everybody reads and understands this Policy.

Integrity - Integrity implies being fully worthy of the trust placed in us by our customers, suppliers and employer by being honest, impartial and truthful. This means:

- Acting at all times in an honest and upright manner both in our corporate and personal dealings, recognising that our personal conduct may reflect on the Company
- Scrupulously refraining from illegal, fraudulent, dishonest or unethical behaviour, particularly in relation to business dealings
- Never using confidential information for personal gain or abusing the trust placed in us by the Company
- Avoiding conflict between self-interest and the interest of the employer, and being ready and willing to disclose any potentially compromising or conflicting business relationships or shareholdings
- Where husbands, wives, partners or other relatives are employed in the same or related areas; never allowing personal and/or domestic circumstances to impinge upon or affect either working relationships or the breaching of the Company's employment regulations regarding confidentiality and fidelity
- Avoiding gifts, services or hospitality on a scale which could be interpreted as affecting integrity or the ability to exercise independent judgement

Fidelity - Fidelity embraces duties of loyalty, confidentiality and citizenship in relation to the affairs of our Company. This means:

- Promoting the good standing and name of the Company and defending it against unwarranted criticism
- Ensuring that any undertakings given are within our personal capacity and fully honoured.
- Safeguarding information in relation to the Company's affairs and restricting access to any confidential or sensitive documents
- Taking care over our communications – oral, written or electronic – to prevent others acquiring confidential information
- Not knowingly engaging in business that might in any way be associated with, or regarded as supportive of, illegal or criminal activities, construed as bribery or corruption or, which would be contrary to the national interest of respective countries
- To not knowingly deal with companies that do not adhere to international human rights and environmental laws and practices. This also refers to the Company's Modern Slavery Statement published in this Handbook and also on the Company's website

Self-Respect - Self-respect is enhanced by professionalism, good citizenship and conscientiousness. This means:

- Acquiring the necessary skills, knowledge and experience to conduct business dealings or tasks in a professional manner and keeping abreast of current developments
- Acting with the utmost courtesy at all times
- Seeking help and advice from colleagues where difficulties arise in matters of professional judgement or conduct and adopting an approach of openness and teamwork
- Maintaining your dignity and promoting that of fellow employees, by not bullying or victimising colleagues for any reason and by promoting equal opportunities

Corporate Values (In Relation to Personal Conduct)

- | | |
|---------------------------|------------------------|
| »» Trust | »» Respect |
| »» Integrity | »» Fairness |
| »» Adding Value | »» Striving to Achieve |
| »» Teamwork | »» People Focused |
| »» Leadership empowerment | »» Commercial |



Dignity at Work Policy

The Company aims to ensure that all its employees have dignity at work. That means that there are some types of behaviour that are unacceptable which will include the following:

- Being offensive, abusive, malicious, insulting or intimidating to a fellow employee
- Engaging in unjustifiable criticism towards a fellow employee
- Imposing a punishment upon a fellow employee without reasonable justification
- Changing an employee's duties or responsibilities to his or her detriment without reasonable justification

This policy applies to all employees, regardless of their rank or seniority. Breach of this policy will be treated as misconduct. If you feel that your dignity at work has been compromised you should raise the matter through the Company's grievance procedure.



Environmental Policy

The Company accepts its responsibilities in environmental matters and recognises that good environmental management must be an integral and fundamental part of the business. Although we believe that we have a minimal impact on the environment, the Company aims to continue to improve its environmental performance by:

- Complying with the requirements of all environmental legislation
- Expecting similar environmental standards from all suppliers and contractors
- Conserving natural resources through increased energy efficiency and better water management
- Managing waste and avoiding the use of hazardous substances
- Implementing the use of recycled materials where appropriate
- Preventing and reducing pollution by implementing efficient control procedures to monitor and manage materials and processes that impact on the environment
- Making our Environmental Policy publicly available to interested parties
- Continually seeking to improve environmental performance

Delivering operational plans within this policy will enable the Company to develop sustainable practices and deliver meaningful contributions to the quality of our environment.



Equal Opportunities Policy

The Company is an equal opportunity employer. We have a respectful culture, and want to encourage an inclusive environment where everyone feels comfortable to be themselves. We work and grow together and view laughing together as a sign of enjoyment of our roles and of a lively, busy environment. However, at all times we need to be mindful of how our humour and comments can affect others.

We are committed to ensuring within the framework of the law that our workplaces are free from unlawful or unfair discrimination because of Protected Characteristics as defined by the Equality Act 2010. We have adopted this policy as a means of helping to achieve these aims.

The Protected Characteristics are:

- Age
- Gender
- Marriage and civil partnership status
- Race
- Disability
- Gender reassignment
- Pregnancy and maternity
- Religion or belief
- Sexual orientation

We aim to ensure that our employees achieve their full potential and that all employment decisions are taken without reference to irrelevant or discriminatory criteria.

What is Discrimination?

Direct Discrimination: When someone is treated less favourably than another person because of a protected characteristic.

Associative Discrimination or Discrimination by Association: Direct discrimination against someone because they associate with another person who possesses a Protected Characteristic.

Discrimination by Perception: Direct discrimination against someone because it is thought that they possess a particular Protected Characteristic even if they do not actually possess it.

Indirect Discrimination: Occurs where an individual's employment is subject to an unjustified provision criterion or practice, which for example one sex or race or nationality or age group finds more difficult to meet, although on the face of it the provision, criterion or practice is 'neutral'.

Harassment: Unwanted conduct related to a relevant protected characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual. Employees may complain of such offensive behaviour even if it is not directed towards them personally.

Harassment by a Third Party: Harassment of employees by third parties such as customers or clients.

Victimisation: When an employee is treated less favourably because they have made or supported a complaint or raised a grievance under the Equality Act 2010 or are suspected of doing so.

Commitment

- We are committed to ensuring that all of our employees and applicants for employment are protected from unlawful discrimination in employment
- Recruitment and employment decisions will be made on the basis of fair and objective criteria
- Person and job specifications shall be limited to requirements which are necessary for the effective performance of the job
- Interviews will be conducted on an objective basis and personal or home commitments will not form the basis of employment decisions except where necessary and relevant
- All employees have a right to equality of opportunity and a duty to implement this policy. Discrimination is a serious disciplinary matter which will normally be treated as gross misconduct
- Anyone who believes that he or she may have been disadvantaged on discriminatory grounds should raise the matter through the Company's grievance procedure



Equal Pay Policy

The Company is committed to equal pay for men and women. In this context "pay" includes not only remuneration but also other benefits of employment such as promotion and training opportunities and access to facilities provided within the employment package from time to time. We are committed to introducing and maintaining pay systems which are transparent, based on objective criteria and free from sex bias.

Women and men employed by us are entitled to equal pay if they are undertaking work which is substantially similar or is of equal value to the organisation unless there are specific and clear reasons unconnected with their sex which explain and justify any differential in pay. In some cases individuals carrying out similar work may receive different salaries because of seniority, incremental points, qualifications and other such factors.

You should raise any query or grievance concerning your pay and its evaluation in accordance with the Company's grievance procedure.



Harassment Policy

Harassment pollutes the working environment and can have a devastating effect on the health, confidence, morale and performance of those affected by it. It may also have a damaging effect on other employees not themselves the object of unwanted behaviour who are witness to it or who have knowledge of the behaviour. All employees are entitled to a working environment which respects their personal dignity and which is free from such objectionable conduct. Harassment is a disciplinary offence and it will normally be treated as gross misconduct. A single incident can amount to harassment if sufficiently grave.

Harassment is either:

- Unwanted conduct related to a relevant protected characteristic which affects the dignity of men or women at work
- Bullying of colleagues by intimidating behaviour
- Unfavourable conduct at work, whether verbal or non verbal, towards someone based on a protected characteristic which could affect his/her dignity at work

Examples of harassment include:

- Insensitive jokes and pranks
- Lewd comments about appearance
- Unnecessary body contact
- Displays of sexually offensive material, e.g. Pin-ups
- Repeated instances of minor harassment acts
- Requests for sexual favours
- Speculation about a person's private life and or sexual activities.
- Threatened or actual violence
- Threat of dismissal, loss of promotion, etc. for refusal of sexual favours
- Jokes about a person being either too old or too young to do a job properly
- Age related jokes

Bullying is defined as any form of physical or verbal attack and/or threat of such, or the abuse of position, in order to attack or undermine the confidence or ability of another, or to place another employee under unreasonable pressure or subjecting another to detrimental treatment, by either act or omission.

Employees may complain of behaviour that they find offensive even if it is not directed at them personally and they do not personally possess the relevant protected characteristic.

Employees are also protected from harassment related to Discrimination by Perception and Associative Discrimination.

Where harassment arises from people not directly employed by the Company e.g. customers or clients, such complaints will be taken seriously and will be pursued with the third party concerned, exercising whatever sanctions are available.

Anyone who believes that he or she may have been the victim of harassment should raise the matter through the Company's grievance procedure.



Health and Safety at Work Policy

The Company is committed to ensuring the health, safety and welfare of all employees.

It is the intention of the business that its Occupational Health and Safety Management System will assess and control the occupational health and safety impacts of its activities, products and services, and will also serve to implement the occupational health and safety policy throughout the business. The system will be implemented, maintained and continually improved throughout the business.

The Company commits to:

- Provide safe and healthy working conditions which aim for the prevention of work related injury or ill health
- To eliminate hazards, so far as is reasonably practicable, and reduce occupational health and safety risks
- Conduct its activities in full knowledge of, and compliance with, the requirements of applicable legislation, Approved Codes of Practice and other requirements agreed by top management.

The Company will establish occupational health and safety objectives and targets through Group management review, and measure performance against these targets utilising an agreed framework.

Consultation and participation with our workforce, and any applicable representatives will form the foundation of our occupational health and safety management.

Consideration is taken of occupational health and safety aspects arising from business decisions, activities and processes.



Whistle-Blowing Policy

Introduction

All of us at one time or another have concerns about what is happening at work; usually these concerns are easily resolved. However, when they are about unlawful conduct, financial malpractice or dangers to the public or the environment or any other matter of a serious nature, it can be difficult to know what to do.

You may be worried about raising such issues or may want to keep the concerns to yourself, perhaps feeling it's none of your business or that it's only a suspicion. You may feel that raising the matter would be disloyal to colleagues, managers or to the organisation. You may decide to say something but find that you have spoken to the wrong person or raised the issue in the wrong way and are not sure what to do next. The Company has introduced this policy to enable you to raise your concerns about such possible malpractice at an early stage and in the right way. We would rather that you raised the matter when it is just a concern rather than wait for proof.

If something is troubling you which you think we should know about or look into, please use this policy. If, however, you are aggrieved about your personal position, please use the Grievance Procedure - which you can get from your Manager or the HR Department. This Whistle-blowing Policy is primarily for concerns where the interests of others or of the organisation itself are at risk and includes reporting any concerns about activities in our supply chain that would contravene the Modern Slavery Act 2015.

If in doubt - raise it!

Our Assurances To You

Your Safety

The Board and Chief Executive of the Company are committed to this policy. If you raise a genuine concern under this policy, you will not be at risk of losing your job or suffering any form of retribution as a result. Provided you are acting in good faith, it does not matter if you are mistaken. Of course, we do not extend this assurance to someone who maliciously raises a matter they know is untrue.

Your Confidence

We will not tolerate the harassment or victimisation of anyone raising a genuine concern. However, we recognise that you may nonetheless want to raise a concern in confidence under this policy. If you ask us to protect your identity by keeping your confidence, we will not disclose it without your consent. If the situation arises where we are not able to resolve the concern without revealing your identity (for instance because your evidence is needed in court), we will discuss with you whether and how we can proceed.

Remember that if you do not tell us who you are, it will be much more difficult for us to look into the matter or to protect your position or to give you feedback. Accordingly, while we will consider anonymous reports, this policy is not well suited to concerns raised anonymously.

What is Protected?

A 'qualifying disclosure' is one of information that in the reasonable belief of the disclosing worker shows wrongdoing of one or more of the following kinds:

- A criminal offence was committed or is being or is likely to be committed
- A person has or is or is likely to fail to comply with a legal obligation
- A miscarriage of justice has occurred or is likely to occur
- The health and safety of any individual has been, or is being, or is likely to be endangered
- The environment has been, is being, or is likely to be damaged
- That information tending to show any matter falling within any one of the above categories has been, is being, or is likely to be deliberately concealed



Whistle-Blowing Policy Continued

How We Will Handle The Matter

Once you have told us of your concern, we will look into it to assess initially what action should be taken. This may involve an internal inquiry or a more formal investigation. We will tell you who is handling the matter, how you can contact them and whether your further assistance may be needed. If you request it, we will write to you summarising your concern and setting out how we propose to handle it.

When you raise the concern you may be asked how you think the matter might best be resolved. If you do have any personal interest in the matter, we do ask that you tell us at the outset. If your concern falls more properly within the Grievance Procedure, we will tell you.

While the purpose of this policy is to enable us to investigate possible malpractice and take appropriate steps to deal with it, we will give you as much feedback as we properly can. If requested, we will confirm our response to you in writing. Please note, however, that we may not be able to tell you the precise action we take where this would infringe a duty of confidence owed by us to someone else.

How to Raise A Concern Internally

Stage 1

If you have a concern about malpractice, we hope you will feel able to raise it first with your Manager - this may be done orally or in writing.

Stage 2

If you feel unable to raise the matter with your Manager, for whatever reason, please raise the matter in the first instance with your HR Representative thereafter either the Company Secretary or another Senior Manager / Director. Please say if you want to raise the matter in confidence so that they can make appropriate arrangements.

Stage 3

If these channels have been followed and you still have concerns, or if you feel that the matter is so serious that you cannot discuss it with any of the above, please contact Safecall. Safecall are an independent whistle-blowing hotline provider engaged by the Group. Further information can be seen on the Safecall website.

Independent Advice

If you are unsure whether to use this policy or if you want independent advice at any stage, you may contact Safecall at any time.

Telephone number: 0800 915 1571

External Contacts

While we hope this policy gives you the reassurance you need to raise such matters internally, we recognise that there may be circumstances where you can properly report matters to outside bodies, such as regulators or the police. Public Concern at Work will be able to advise you on such an option and on the circumstances in which you may be able to contact an outside body safely.

If You Are Dissatisfied

If you are unhappy with our response, remember you can go to the other levels and bodies detailed in this policy.

While we cannot guarantee that we will respond to all matters in the way that you might wish, we will try to handle the matter fairly and properly. By using this policy, you will help us to achieve this.





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