

ETHICAL CONDUCT POLICY STATEMENT

The Company genuinely believes that good communications amongst employees at all levels promote better business practice.

The Company will not tolerate wrong doing by employees at any level.

If any employee has a serious concern relating to one of the areas listed below the matter can be reported without fear of reprisals.

If you genuinely believe that the Company or any employee of the Company has taken, is intending or has failed to take action which you reasonably believe will lead or amount to:

A criminal offence

A failure to comply with any legal obligations

Danger to the health and safety of any individual

Damage to the environment or

The deliberate concealment of information tending to show any of the matters listed above

You can disclose this information orally or in writing to the Company's Managing Director. If you make such a disclosure, you should provide full details and, where possible, supporting evidence.

The Company will promptly investigate your allegation and will take whatever action it considers appropriate. Your assistance may be required during the investigation. Your allegation will be addressed seriously and you will be informed of the outcome of the investigation as soon as practicable.

Any employee found to be victimising another employee for reporting a concern or deterring any employee from reporting genuine concerns, may be subject to disciplinary action that may result in dismissal. Equally, if your disclosure/allegation is found to be malicious or vexatious, or there were no reasonable grounds for you believing that the information supplied was accurate, the company's disciplinary procedure may be invoked which may result in your dismissal.

Business Ethics (Bribery Act 2010)

Use of Company tools/equipment for personal use is strictly forbidden unless authorised by a senior manager of the Company. (To help engender a spirit of goodwill within the Company such requests will be viewed sympathetically on a case-by-case basis, but in all instances the Company's Health and Safety procedures must be complied with.

Use of the Company's materials for personal use (including scrap material) is strictly forbidden unless written permission is given by the Managing Director.

Employees are strictly forbidden from accepting any offer of any gift or hospitality of significant value from anyone who is doing business with the Company or who is hoping to do business with the Company.

No gift having a significant value may be accepted under any circumstances. A gift worth more than £20 is considered to have a significant value.

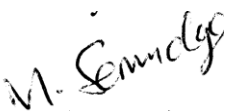
Lunch is considered to be normal business entertaining.

The Company does not condone or allow any unlawful business conduct, including the giving of improper personal payments.

If a potential conflict of interest may arise between an employee and a supplier or customer, this must be reported by the employee concerned and a senior manager informed who will record in writing the outcome of the employees concern to avoid any potential future confusion or dispute

All employees owe a duty of confidentiality to the Company. Under the duty of confidentiality you may not disclose confidential information of the Company without proper authorisation.

NOTE: A breach of the business ethics guidelines may be construed as gross misconduct and could lead to dismissal.



Signed:
Managing Director

Date: 01-01-18