

Business Objectives:- The Company's principal Business Objective is to satisfy all its customers by providing quality products and a first-class service, and to continually improve service levels in line with all customer, regulatory, statutory and social responsibility requirements.

The Directors recognise that to achieve this objective, the Company must deliver a quality service to all its customers, dealer networks and franchisers and must continually develop its employees, who are its most important assets, its processes and its suppliers.

To help deliver a quality service, the Company operates a Business Management System [BMS], based on ISO 9001, to maintain and develop increased levels of Competitiveness and Customer Satisfaction by a process of Continuous Improvement. The BMS is integrated with the Company's Environmental and Health & Safety Policies to provide a complete service to all stakeholders.

Core Values:- Achieving our Business Objectives is under-pinned by our Core Values of:-

Behaving ethically, lawfully and with integrity with our customers, suppliers, employees, statutory bodies, neighbours and society as a whole.

Striving to work safely at all times to protect the health and welfare of our employees, customers, contractors and neighbours,

Striving to safeguard the environment in all our operations.

This Code of Conduct defines what the Company expects from its employees in their relationships with customers, suppliers, neighbours and the community at large. This Code of Conduct cannot anticipate every situation that may occur; however, the spirit of the Code should be followed whatever the circumstances.

KEY FEATURES OF THE CODE

Law, Culture and Ethical Behaviour

All relevant national and international laws and regulations shall be observed and the cultures of the countries in which our suppliers operate, and in which our Engineers may serve, shall be respected. We must accept personal responsibility for behaving with integrity, fairness and in a professional and ethical manner at all times.

Gifts, Favours and Payments

The exercising of independent judgement on behalf of the Company must not be influenced by any considerations of personal advantage.

No one may give or accept gifts, favours or entertainment that could be construed as being a bribe, kickback or payoff. The giving and receiving of modest gifts or entertainment that is reasonable and has a valid business rationale is acceptable.

Payments in any form made to any government body or officials for the purpose of obtaining business or other advantage are prohibited.

Relationships with Customers, Suppliers and Competitors

The Company aims to provide its customers with original products designed and supplied by its franchisers that are of high quality, competitively priced, delivered to schedule and supported by excellent customer service as detailed in our Customer Care Policy.

The selection of Suppliers shall be made on the basis of quality, price and performance of the products and services offered.

The Company believes in free and open competition and will compete vigorously, but with integrity and honesty. Every employee must comply with all national and international laws and regulations relating to competitive activity.

Working Safely

Our employees' health safety and well-being, as well as that of our customers, contractors, suppliers, neighbours and visitors are of paramount importance.

The Company aims to provide a clean, healthy and safe working environment in accordance with best industrial practice.

The Directors recognise that we all have a duty to take every reasonable precaution to avoid injury to ourselves, colleagues, customers and members of the public.

Sustainability

The Directors are committed to running the Company in accordance with the principles of sustainability. We will seek to protect and enhance the environment by operating our plant and that of our customers in ways which minimise impact on the environment and cause no harm; we will utilise processes that are more sustainable and we will work with our suppliers to encourage more-efficient use of natural resources throughout the product life cycle.

Relationships with Local Businesses, the Community and the Armed Forces

Long-standing relationships with local communities and organisations are encouraged and can be of mutual benefit to the community, the Company and its employees. In line with this value, the Company has signed the Armed Forces Covenant and will endeavour to support the Armed Forces Community by recognising the values that serving personnel, both regular and reservists, veterans and military families can contribute to our country and to our business.

Integrity with Records and Personal Information

The books and records of the Company must reflect all transactions accurately and completely. No employee shall make arrangements that result in false or artificial entries in any company records, including expense statements.

The Company must ensure that personal data is processed in a secure manner and is only used for the purpose intended. Information stored on computers will not be used by itself to make decisions affecting individuals. These decisions should be made as the result of consultation between individuals and their managers.

Confidential information relating to the Company's financial and commercial activities, customers, suppliers and specialist technical knowledge is an important asset of the Company. Such information must not be disclosed at any time to anyone outside the Company without the approval of the Directors or unless the person receiving the information has already signed an appropriate confidentiality agreement.

Responsibility of Individuals and Reporting Concerns ("Whistle-Blowing") (2 paras combined)

Each and every one of us has the responsibility and is trusted to maintain the standards set out in the Code and it is important that employees have the means to report any aspects of this Code that are not being followed. Employees should not feel apprehensive about voicing concerns and they should not believe that by so doing they are being disloyal or that they will experience

recriminations. Reports made in good faith will be valued and individuals who make them will not be liable to disciplinary action.

The list below is not exhaustive but we should report the following kind of incidents:-

- Criminal offences
- Failure to comply with legal obligations
- Miscarriages of justice
- False accounting or other false reporting
- Misuse of Company assets
- Improper relationships with suppliers, customers or competitors
- Actions which endanger the health or safety of employees, customers or the public
- Actions which cause or could cause damage to the environment

Employees can make a report to the Managing Director who shall be responsible for managing the investigation process. Alternatively, any employee may make a complaint to an independent party such as "Public Concern at Work (www.pcaw.org.uk).

International Human Rights and Employment Standards

The Company acknowledges internationally proclaimed human rights and will apply employment standards to promote the application of human rights thus:-

- Abuse, harassment or intimidation will not be tolerated under any circumstances,
- There will be no intentional discrimination in any employment related activity on the basis of race, colour, creed, religion, age, gender, sexual orientation, national origin, disability, union membership or political affiliation,
- The Company and its suppliers will not engage in enforced, slave or child labour (young people under the age of 15, or older if defined by law),
- There will be appropriate employee consultation and two-way communication on each side to meet the joint needs of the business and its employees,
- The rights of employees to join (or not to join) a trade union of their choice will be respected,
- Fair and just remuneration policies and practices will be followed,
- Employees will not be required to work excessive standard hours on a regular basis and overtime working will not be excessive,
- Training and relevant experience will be provided to enable individuals to perform their roles safely and competently and to develop their full potential.

Signed:-

 (Managing Director)

Date:-

March 2016

Next Review:-

March 2018