



# CODE OF CONDUCT



## Note from our Chief Executive

Our mission is to enable our Members to fulfil their purpose through independent, world-leading expertise across materials, joining and structural integrity, supported by global investments into innovation, people and capabilities. To succeed with our Corporate strategy, we need to be trusted. We are proud of our international reputation for integrity as experts and we will strive to protect and enhance this by maintaining the highest levels of professional and business ethics in everything we do.

On a daily basis we are all called upon to make decisions and we must strive to make sure these are the right ones, made for the right reasons for our business, our Members, our employees, our partners and our students. This Code of Conduct will guide us and is built on our values, which shape our behaviours, and will ensure that everyone is treated with respect.

We have covered many of the dilemmas that you may come across but it is not possible to anticipate every scenario that may exist now or in the future. If there are occasions when you are unsure of what the right decision is, please reach out to colleagues, managers or the People and Culture team for support and further guidance.

If you see or hear anything that you feel breaches this Code, please speak up and let us know, using the whistleblowing hotline where appropriate. Any concern raised will be treated seriously and we will not tolerate retaliation against anyone who speaks up in good faith.

This code is for all stakeholders of The Welding Institute group of companies. By following the principles and guidance provided, we can be confident that we will maintain the trust that is so vital to our business success.

Thank you



Aamir Khalid  
TWI Chief Executive

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## Our Code of Conduct

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## Guiding our Actions – Our Values and Behaviours

Our values provide a point of reference for the way we expect our people to operate and behave. They reflect in the way we do business with our customers and with each other.



TEAM WORK

Building effective working relationships, we accomplish more together



INNOVATION AND EXPERTISE

Championing new ideas and sharing knowledge to solve industry problems



TAKING RESPONSIBILITY

Achieving our objectives and personal development



CUSTOMER FOCUS

Building trusting relationships with our customers



ADAPTABILITY

Engaging positively with change to meet the needs of the business



INCLUSION

Valuing the contribution from every individual, creating value for our customers

## 1. Introduction

### 1.1 Our Code of Conduct

Our Code of Conduct ('Code') demonstrates how The Welding Institute group of companies ('Group') is focused on doing the right thing. It defines how we should conduct ourselves in our working lives to ensure that we maintain the highest business standards. It also addresses our responsibilities to the Group, our Members, our customers, our partners, other stakeholders and to each other.

Our values and behaviours underpin every aspect of this Code. The Code also addresses specific areas of our business where it is particularly important for us to understand explicitly what is meant by our high standards. The Code complements our policies, procedures and governance documents and is intended to be adhered to in conjunction with these.

### 1.2 Who must follow our Code

Our Code applies to the Group including all subsidiaries that are controlled by The Welding Institute or a majority owned subsidiary and any joint venture controlled by the Group.

It applies to all internal stakeholders of the Group; employees, executive and non-executive directors and Council Members.

We request that our suppliers, subcontractors, temporary workers, students and other third parties we work with apply the principles of this Code or work to their own similar standards.

### 1.3 Upholding our standards

We operate in many countries and as such, there will be times when local laws, regulations or customs conflict with our Code. It is our responsibility to apply the strictest standards to all our business dealings at all times, therefore if there is a difference between our Code and a legal requirement the latter will be the minimum standard applied. Wherever permitted the standards given within this Code will be applied.

It is not possible for this Code to be exhaustive and set out every legal or company requirement. In some situations, you will need to use good judgement to make ethical decisions based on the principles contained in this Code. If you are faced with a dilemma and you are unsure how to solve it, then you should ask for help from the leadership team.

### 1.4 Compliance to the Code

Breach of this Code is not acceptable and may result in the company taking action, which may include disciplinary action up to and including dismissal.

## 2. Know Your Responsibilities

### 2.1 Expectations of everyone

Everyone is expected comply with our Code and act in accordance with local laws. We are expected to use good judgement in decision making and avoid even the appearance of improper behaviour. The spirit of the Code is to be applied at all times.



## 2.2 Consider your actions and seek support and guidance

If you are ever in doubt about a course of action, then ask yourself the following questions:

- Is it consistent with our Code?
- Is it consistent with our ethics Policies?
- Is it legal, fair and honest?
- Will it reflect well on me and the Group?
- Would I want to see a story about it in the media?

If the answer is “no” to any of these, then do not do it.

If you answer “yes” to any of the above and you remain uncomfortable or unsure then seek further support and guidance from your line manager, an alternative manager or the People and Culture (PAC) Team.

## 2.3 Demonstrate personal compliance

We are all expected to comply with all Group and company specific policies and procedures, act in accordance with [Our Values and Behaviours](#) and cooperate fully in any investigations or audits, as requested or as per guidance and instruction provided in relevant policies.

## 2.4 Expectations of managers

In addition to the above expectations, all managers are expected to:

- Engage with team members to enhance understanding and assist in the embedding of this Code in daily work life;
- Create an environment where your team feel comfortable to speak up and raise questions on the Code;
- Listen and respond to any concerns raised by team or individual team members;
- Be consistent when enforcing our standards and holding team members accountable for their behaviour at work.

## 2.5 How to raise concerns

We all have an obligation to uphold the Code and ethical standards. If you see any behaviour that concerns you or that you believe could be a violation of the Code then you need to report it promptly, giving all the information you have. Doing so will allow the company to deal with the issue and correct it, ideally before it becomes a breach of law, regulations or our policies.

If you have a question or concern the first point of contact is your line manager.

If you feel it is not possible for you to speak to your line manager, you can contact the Head of PAC, Personnel Security Controller as designed within the Security team or (where applicable) the Whistleblowing hotline. Please refer to the Whistleblowing Policy for the country specific phone numbers.

The Group takes all reports of possible misconduct seriously, anything reported will be investigated, and any contraventions of our Code, or the law, will be appropriately dealt with.

## 2.6 Protection from retaliation

We will not tolerate retaliation and will protect anyone raising concerns or participating in an investigation under this Code, so long as they have acted honestly and in good faith. This is irrespective

of whether any contravention of the Code is found following investigation. If you experience retaliation or know of someone who has experienced retaliation within this context, you should contact your line manager or the Head of PAC who will ensure the situation is investigated and corrective action taken where necessary.

Anyone who knowingly raises a false accusation, interferes or refuses to cooperate with an investigation under this Code is not acting in good faith and will be subject to investigation which may lead to action being taken under the disciplinary procedure. Such action could be up to and including dismissal.

### 3. Accuracy and Integrity

Accuracy and integrity runs through everything that we do and is demonstrated by how we deal with our company records, assets and information. We have a responsibility to take care of our assets and resources and to be honest and transparent about our operations and performance.

#### 3.1 Your work

We enjoy an excellent reputation, thanks to a solid record of ethical conduct in every aspect of work undertaken both internally and externally. It is a corporate objective to maintain and nurture this reputation. In addition we mentor the next generation of engineers and must ensure that they too understand and adhere to the highest standards of ethical conduct.

#### Our expectations of you

To ensure we comply with our requirements on the integrity of work undertaken you must:

- Take responsibility for keeping your knowledge up to date on the policy, processes, standards and procedures that apply to your work;
- Conduct, manage, judge, and report all work with objectivity, honesty, thoroughness and with rigour;
- Not falsify, manipulate, misrepresent nor suppress results or outputs;
- Not fabricate data, outputs or observations;
- Not plagiarise the work or ideas of someone else;
- Be honest and realistic in stating opinions or estimates based on the data available;
- Design, conduct and report work in ways that embed integrity and ethical practice throughout;
- Strive to maintain an awareness of up to date legal and ethical requirements;
- Ensure all documents and reports are full, fair, accurate, timely and understandable; in public funded project work, acknowledge and where appropriate declare all conflicts of interest and ensure that all research is subject to appropriate consideration of ethical issues;
- Do not knowingly engage in activities where a conflict of interest impedes your ability to act in an objective, honest, and ethical manner;
- Be willing to accept ownership for the validity and interpretation of data from both your contribution and for the conclusions presented;
- Clearly define expectations for proposals and projects for which you are the project lead;
- Recognize past and present contributors to your work in any permissible publications;
- Act in good faith with regard to concerns and raise by the most appropriate means;
- Do not accept or assume credit for another's work.



## 3.2 Business records

Accurate recordkeeping and reporting reflects on our reputation and credibility, and ensures that we meet our legal, regulatory and governance obligations.

Ensuring the accuracy and completeness of our business and financial records including and not limited to, financial accounts, audit records, project work and membership records, is everyone's responsibility and we each need to know which records we contribute to and how we can comply with these.

We maintain a rigorous system of financial, operational and compliance controls and an effective system of risk management.

### Our expectations of you

To ensure we comply with our recording requirements you must:

- Use appropriate diligence in preserving and maintaining documentation, such as original data records, so that others may reproduce results;
- Ensure all documents and reports are full, fair, accurate, timely and understandable;
- Record and classify transactions to accurately reflect the accounting period, the department and the true nature of any transaction. Do not delay or accelerate the recording of revenue or expenses to meet budgetary goals;
- Ensure accounting estimates and accruals are supported by appropriate documentation and are based on your best judgment;
- Preserve documents and records in accordance with applicable legal requirements and company policy and procedures;
- Comply with legal, financial, administrative and other obligations including reporting to tax or other authorities both in UK and internationally; do not alter or delete records unless authorised to do so. When discarding records, disposal must be undertaken after the minimum relevant retention period (please reference our Data Retention Policy) and with due regard to the confidentiality of the information being discarded;
- Record accurately, in a timely manner and in accordance with local procedures all expenditure, hours worked, transactions or any other aspect of the Group's business;
- Not allow yourself to be influenced or influence others to do anything that would compromise the integrity of our business records, reports, products or services;
- Report any suspicion of fraud, bribery or corruption immediately in accordance with our Anti-Fraud, Bribery and Corruption Prevention Policy;
- Comply with the delegated authority levels for the approval of financial and other business decisions.

## 3.3 Safeguarding company assets

Our assets include our facilities, property and equipment, computers and IT systems, telephones and other communication devices (e.g. tablets and mobile phones), photocopiers, proprietary information, intellectual property and company brand. They also include the assets generated by each of us as employees, such as our time and what we produce during our working day.

## Our expectations of you

To ensure we comply with our requirements on safeguarding our assets you must:

- Protect our assets and use them in the manner intended. Company assets are not expected to be used for personal benefit nor for the benefit of anyone other than the business;
- Not use company provided platforms, computers and equipment for outside business or for illegal or unethical activities such as pornography, gambling, downloading unlicensed or pirated software or material, or accessing other offensive materials;
- Devote working hours to work activities;
- Not seek personal gain from the use, sale, transfer or other disposal of company assets without authorisation in writing by your Executive Director. Any such authorisation will be time bound (where applicable);
- Before giving opinions or views on intellectual property matters always seek guidance from the IP manager;
- Not use intellectual property if you are not clear whether you have a legal right to use it. If you have any doubt about the right to use any intellectual property that you have access to then you must seek guidance from the IP Manager.

If you are unsure whether your usage of a company asset would be considered misuse you should refer to our IT Policies or ask your line manager for guidance.

## 4. Conducting our Business

### 4.1 Export control and trade compliance

We comply with all trade requirements, which exist within the countries in which we operate; this includes compliance with economic sanctions and import and export laws, regulations and procedures. If in any doubt you should consult the Legal Affairs Group.

### Our expectations of you

To ensure we comply with our requirements on Export control and trade compliance you must:

- Comply with applicable export and import laws and regulations when transferring goods, services, software or technology;
- Comply with national and international sanctions and embargoes;
- If you are involved in the transfer of goods, services, software or technology (including items carried in hand baggage), make sure you understand the laws and regulations that apply, including those of other countries affected by the transfer;
- Know what labelling, documentation, licenses and approvals need to be completed for the transfer of goods, services, software or technology (including items carried in hand baggage) intended for import/export;
- Make sure that all duties, levies and tax obligations are satisfied, that the terms and conditions of any import or export authorisations are complied with, and that any necessary import or export declarations are made.

### 4.2 Competition

We respect fair competition in our business dealings and we are confident that our brand, our reputation for impartial expert advice and our expertise in the technologies we support will enable us to continue to be successful in our markets.

## Our expectations of you

To ensure we comply with our requirements on safeguarding our assets you must:

- Not use any confidential information that is offered to us whether by third parties or brought to us by new employees from former employers;
- Not use a competitor's or former employer's confidential information for any company purpose;
- Avoid making formal or informal agreements with competitors which result in anti-competitive activities such as price fixing, bid rigging, market allocation, and arrangements to limit supply;
- Be careful before you agree to any restrictions on customers, joint venture partners or suppliers as to who they can sell to or buy from and on what terms;
- Report any suspicions or allegations of anti-competitive behaviour to the Legal Affairs Group.

### 4.3 Respecting third party information

We have access to highly sensitive and confidential business and personal information. Our Members, customers and partners trust that we will treat this information in compliance with relevant laws and regulations. We do not solicit, acquire, read or use the confidential or proprietary information of other parties that we know to be proprietary or restricted against disclosure. When working with customers such as governments and defence companies where projects may raise issues of national security, we will not seek unnecessary or unauthorised access to material and we will handle customer classified or proprietary marked information in accordance with the appropriate legislation, policies and processes. Any breach of confidential information has the potential to seriously impact our reputation and future business opportunities as well as have very serious consequences for those involved in the breach. Protection of confidential information is therefore of the highest priority for us. If in doubt you should consult the Legal Affairs Group.

## Our expectations of you

To ensure we comply with our requirements regarding respecting third party information you must:

- Not use any third party confidential or commercially sensitive information other than for the purpose for which it was disclosed;
- Not disclose any third party confidential or commercially sensitive information unless authorised to do so;
- Avoid placing yourself, or the company, in the position of receiving third party confidential information (including software) or commercially sensitive information when not authorised to do so;
- Not receive or copy documents or material (including software) unless you have permission to do so;
- Not seek access to secure or classified materials where access is not required for legitimate business purposes or if you are not authorised to do so;
- Keep all documents provided to us in confidence by other parties protected and secure. It is especially critical for our people with access to government classified information or protectively marked documents to deal with them in line with business policies, processes and procedures, and the appropriate legislation;
- Never alter the confidentiality status of a third party document when not authorised to do so.

## 4.4 Respecting company information

We are all expected to safeguard any company confidential and commercially sensitive information that is not in the public domain at all times. This obligation exists both during your employment and after your employment has ceased.

Under this obligation we must not disclose or permit to be disclosed to any unauthorised person any confidential information acquired by us in the course of business. An unauthorised person could be:

- Anyone outside the business, including family and friends, who have no business relationship with the Group;
- Colleagues within the business who do not require the information for a legitimate business purpose.

Confidential information in this context includes company information both technical and commercial relating to the company, our employees, our Members, our customers, our suppliers or our partners that is not publically known or available. If in doubt you should consult the Legal Affairs Group.

### Our expectations of you

To ensure we comply with our requirements in respecting company information you must:

- Ensure whilst working remotely that you are mindful of any individual who may be able to see your screen and, if you are on an audio/video call, be mindful of who else can hear your conversation. Please declare to the audio/video conferencing participants if there is someone within earshot of a conversation;
- Not disclose any company confidential information (including software) when not authorised to do so;
- Not seek access to secure or classified materials where access is not required for legitimate business purposes or if you are not authorised to do so;
- Keep all company confidential information in a protected and secure manner and only access and transfer these in line with business policies, processes and procedures, and the appropriate legislation;
- Consider appropriate confidentiality marking of information when disclosing to third parties;
- Not alter the confidentiality status of a document when not authorised to do so.

## 4.5 IT security

We have comprehensive and robust IT security measures in place to protect our information including regular monitoring across all our systems against cyber-attacks and malicious activity. However our automated systems alone cannot guarantee our information remains uncompromised. We may periodically review and monitor messages and call records for security and other business purposes in line with applicable laws. We all have our part to play and everyone needs to be constantly vigilant.

### Our expectations of you

To ensure we comply with our requirements on safeguarding our assets you must:

- Use only company issued assets for work;
- Apply the company's personal IT security measures in your daily work;
- Not try to circumvent IT security controls;
- Make sure your user IDs and passwords are secure – always use a combination of letters, numbers, symbols, lower and upper case and change these regularly;

- Never use a memory stick to add or remove data from your computer without permission of Information Communications Technology (ICT) team;
- Use encryption when sharing particularly sensitive and confidential information electronically;
- Be vigilant against cyber-attacks and scams, such as phishing, and report any incidents or concerns immediately to Head of IT;
- Report immediately to your manager and to the ICT team any loss of any company computer or communication devices and make them aware of what information could be accessed via these devices.

### 4.6 Personal data and privacy

We respect the personal privacy of our people in line with applicable laws and company policies and procedures. We take our obligations to protect individual's privacy very seriously and only collect and store personal information for employment and business purposes. We only gather and use personal information that we need to operate effectively and comply with our legal obligations and such information is only accessible to those who need access to conduct their work.

#### Our expectations of you

To ensure we comply with our requirements on personal data and privacy you must:

- Take every care to ensure that personal data is only used for legitimate business purposes and only used for the purposes for which it was collected;
- Respect the rights of individuals whose personal information you process;
- Inform your manager if you have any concerns about how personal information is secured, processed or shared in the area of the business in which you work;
- Report using the Security Risk and Incident Form if you ever receive personal information that is not intended for you and that you do not need for your work;
- Delete/destroy the personal data you have received with due regard to its confidential nature;
- Never disclose the personal data to a colleague unless required to do so for business purposes and on a need to know basis.

### 4.7 Personnel security

We have a responsibility to ensure the effective management of personnel security of all our people, particularly those who are subject to National Security Vetting, as part of ongoing personnel security (aftercare). Certain circumstances and behaviours may make people vulnerable to pressure or improper influence or could otherwise indicate unreliability. Some examples that may cause concern from a personnel security perspective include:

- Financial issues – such as debt (e.g. County Court Judgements (CCJs)) or sudden or unexplained access to large sums of money
- Drug abuse.
- Alcohol abuse.
- Sexual misconduct.
- Illegal or ill-advised behaviour.
- Compulsive gambling.
- An illness or condition (primarily mental, but not exclusively) which may cause significant defects in judgement or make the individual, unintentionally, a security risk. This can also include physical conditions such as diabetes, or epilepsy, where an individual may potentially suffer from sudden, or uncontrolled episodes of unconsciousness.

- Involvement with extreme religious or political groups that are involved or advocating espionage, terrorism, sabotage or political, industrial or violent actions intended to overthrow or undermine parliamentary democracy.
- Gross infringement of disciplinary codes and regulations.
- Arrests, police cautions or convictions.
- Inappropriate use of social media.
- Misuse of company IT or Information Systems.

### Our expectations of you

To ensure we comply with our requirements on personnel security you must:

- Approach your line manager or the Personnel Security Controller to discuss any security issues of concern that you be experiencing;
- If you hold National Vetting Clearances, declare at your earliest convenience a change of personal circumstance either with a member of the Security team or directly to United Kingdom Security Vetting (UKSV);
- Report to your line manager, Security team or Head, People and Culture if you have any concerns that the behaviour or attitude of any colleague has or could threaten the security of the company;
- Comply with all security requirements of our security policy, processes, procedures or standards, as identified by the Security team or others.

### 4.8 Environmental commitment

In our work, we use our expertise to find solutions which minimise environmental impact and meets the challenging needs of our Industrial Members. We will protect the environment in ways that are acceptable to the local communities within which we operate.

All of us are expected to contribute to reducing the environmental impact of everything we do, irrespective of whether it is in connection with applying our skills and knowhow to deliver solutions for our Members and customers or considering how we can reduce waste, use our resources better or prevent pollution in our working environment.

### Our expectations of you

To ensure we comply with our requirements on our environmental commitment you must:

- Consider and implement actions that minimise the environmental impact of the work you undertake;
- Take responsibility for impacts of your research and development on the environment;
- Stop work if you think there is an immediate environmental concern;
- Intervene if you are concerned that an action or decision might result in us not meeting the requirements of our environmental policy, processes, procedures or standards;
- Contribute suggestions for improving our environmental footprint – everyone can help.

### 4.9 Health and safety

We are focused and committed to providing a healthy and safe working environment and it underpins everything we do.

## Our expectations of you

To ensure we comply with our requirements on health and safety you must:

- Set high standards for your health and safety behaviour and expect the same of others;
- Follow all local health and safety procedures that we have in place and always act with due care for your own and others health and safety;
- Be sure that you do not put yourself or your colleagues at risk due to your performance being adversely affected (e.g. sleep deprived, drink and drugs, injury);
- Stop work if you think it is unsafe;
- Intervene if you are concerned that an action or decision might result in us not meeting the requirements of our health and safety policies, processes, procedures or standards;
- Report any concerns with the health and safety of your work environment;
- Report any accident, injury or illness or unsafe conditions immediately using the laid down procedures;
- Actively support learning from health and safety incidents, including near misses and unsafe acts/conditions;
- Be aware of and always follow your workplace emergency procedures.

### 4.10 Social responsibility

We have an ongoing commitment to, and awareness of, corporate social responsibility in all its locations in the UK and overseas and see it as an integral part of our corporate governance.

We are committed to operating our business with due regard to respecting the human rights of both employees and those in the local communities in which we operate. To this end, we offer fair, safe, legally and culturally compliant, market competitive and healthy working practices to those employed by us.

We actively engage with local communities both to raise awareness of different routes into engineering, through local schools and universities, and to support local and national charitable projects and initiatives to develop our relationships with the wider community in which we operate. We make sure that company charitable contributions are appropriate and proportionate.

We actively promote learning and support initiatives across the globe, which help us understand people's differences and help us appreciate the diverse workforce we have. We are committed to creating an inclusive organisation, where all our people are appreciated for the contribution they are making towards economic development and social wellbeing within the communities in which we operate.

## Our expectations of you

To ensure we comply with our requirements on social responsibility you must:

- Make sure that any request for support meets all company requirements and is made and reported appropriately;
- Listen carefully to requests or concerns from the community and address them as applicable after consulting with relevant stakeholders.

### 4.11 Conflicts of interest

We recognise that there could be times when a conflict of interest may occur. A conflict of interest arises where you would be compromising your professional judgment, influencing business



transactions or decisions of the company for your actual, potential or perceived personal benefits or where your personal, professional, financial or other interests might be competing with the interests of the company.

It is important that we recognise when such conflicts exist, or could be perceived by others to exist, and that we take the actions necessary to ensure these actual, potential or perceived conflicts are resolved promptly so that neither our personal integrity nor that of the company is put under question.

## Our expectations of you

To ensure we comply with our requirements in relation to any conflict of interest you must:

- Make sure that conflicts of interest are declared, managed and recorded;
- Discuss with your line manager any personal or professional relationships that could give rise to a conflict of interest and this includes interests or activities that are pursued outside of working hours which could be viewed by an unbiased observer as presenting a conflict of interest;
- Request company permission to undertake or continue interests or activities outside of working hours which potentially present a conflict of interest;
- Keep business interests of the company as a priority at all times during your work responsibilities when dealing with any applicable third parties;
- Make decisions in the best interest of the company;
- Not place work with any business or entity owned or controlled by an employee of the company or their family or friends, unless authorised in advance by the Executive Board;
- Not place yourself in the position of hiring or supervising anyone with whom you have a close personal relationship.

## 5 Integrity in our relationships with others

### 5.1 Bribery, corruption and fraud

We have a zero tolerance policy in relation to bribery, corruption or fraud in any of its forms including scientific fraud. Compliance with all anti-bribery, corruption and fraud legislation and regulations is mandatory for everyone employed by or associated with any part of the Group and we support all efforts to eliminate such behaviours wherever we find them as we conduct our business. We expect all those that we do business with to share our commitment and will always work to support them with their compliance.

Our approach is simple:

- We do not offer or accept bribes, kickbacks or any other kind of improper payment including facilitation payments for any reason;
- We will only appoint intermediaries such as agents and representatives who assist in the marketing and distribution of our products and services of known integrity and require that their conduct meets our standards at all times;
- We ensure that our scientific output is accurate at all times;
- We keep accurate records which accurately describe how the company money has been spent so that we can demonstrate that our funds are not used for fraudulent purposes;
- We know who we are doing business with by conducting all due diligence checks necessary.

## Our expectations of you

To ensure we comply with our requirements on bribery, corruption and fraud you must:

- Comply with anti-bribery and corruption laws, policies and procedures that prevent bribery and corruption and fraud at all times;
- Make sure that appointment of all agents/representatives and suppliers is approved under the applicable policies and procedures following due diligence, and that they work under a valid approved contract;
- Not make facilitation payments;
- Make sure all sponsorships and donations are approved in accordance with company policies and procedures;
- Act in good faith with regard to concerns and raise them by the most appropriate means;
- Not use corporate funds or assets for political donations.

## 5.2 Gifts, meals and entertainment

We do not accept or provide gifts or entertainment in return for any business, services or confidential information or with the intention of influencing a decision from any customer, supplier or other third party. It is acceptable to accept modest gifts on special occasions such as religious or cultural festivals or when to refuse a gift may cause offence due to local culture and tradition. Such gifts need to be declared in the company gift register as belonging to the company and not to the gift recipient. Meals and entertainment or any other form of hospitality can occasionally be accepted if the event is attended by the customer or supplier, and the costs involved are in line with local custom for business-related meals and entertainment.

## Our expectations of you

To ensure we comply with our requirements on gifts, meals and entertainment you must:

- Not offer, give or accept any gifts or entertainment that can be viewed as, or has the effect of, improperly influencing business decisions;
- Only offer or accept gifts or hospitality allowed under applicable policies and procedures;
- Always seek guidance from your line manager or People and Culture, as applicable, in relation to the appropriateness of any gift which you wish to give or receive;
- Under no circumstances accept any gifts, meals or entertainment from a supplier or other third party either immediately before or during a procurement tendering process that you are involved in or may reasonably be aware or have an expectation of. Any gifts received under such circumstances must be notified to your line manager and returned immediately.

## 5.3 Religious & political affiliation

We take the view that personal participation in the religious and political activities/processes is a personal decision so long as such participation does not impact or compromise the Group in any way.

We do not make political or religious donations or give other financial support to any political or religious cause, although we may indirectly contribute to political dialogue when requested to provide our expertise in the areas of engineering, technology and science.

## Our expectations of you

To ensure we comply with our requirements on religious & political affiliation you must ensure:

- Your job will not be affected by your personal religious and political views or your religious and political contributions;
- That your participation and/or financial contributions are a personal choice and your actions are nothing to do with the Group;
- You do not use the company's reputation or assets, including your time at work, logo, or platforms provided, to further your own political or religious activities or interests;
- If you plan to seek or accept a public office, you obtain prior approval from the Executive Board.

### 5.4 Members, customers and suppliers

The Group values its partnerships with Members, customers and suppliers and recognises these need to be appropriately managed to protect all parties. Only those authorised can enter into contracts on behalf of the company and we expect everyone whose role involves engaging third parties to know and follow the procurement processes which underpin these relationships.

It is important to us that we treat our Members, customers and suppliers in the same manner we expect to be treated. In return, we expect that our Members, customers and suppliers to act similarly and to work constructively with us to build, sustain and enhance our relationship.

## Our expectations of you

To ensure we comply with our requirements relating to Members, customers and suppliers you must:

- Always deal with them fairly, honestly and with respect whilst being mindful about protecting our intellectual property and the disclosure of both our and third party confidential information;
- Strive to maintain an awareness of up to date legal and ethical integrity requirements relating to our Members, customers and suppliers;
- Ensure you communicate clearly with them regarding our expectations of them verbally and in writing, including through the contract;
- Raise any concerns you have regarding their compliance with laws or contractual obligations with them.

### 5.5 Our colleagues

We believe in and respect everyone's human rights and we seek to conduct our business in ways that demonstrate this respect and the dignity of all. We all, whether employed by or associated with the Group, are expected to show this respect in our daily dealings with each other.

## Our expectations of you

To ensure we comply with our requirements with respect to our colleagues you must:

- Be honest and professional in your interactions with others;
- Collaborate to maintain a work environment that encourages integrity and transparency;
- Welcome constructive criticism of your work and offer the same to your colleagues in a manner that fosters mutual respect and objective debate;

- Mentor and lead by example including on how to conduct and report your work in an ethical and dignified manner.

## 5.6 Anti-Slavery and Human Trafficking

Modern slavery is an abuse of human rights; it encompasses slavery, servitude, human trafficking and forced labour. The Group undertakes a stance of zero tolerance towards any form of modern slavery and continues to take measures to ensure that neither modern slavery nor human trafficking takes place within our business or supply chain in accordance, with for example in the UK, Section 54(1) of the Modern Slavery Act 2015.

We expect that all members, customers and suppliers comply with all anti-slavery and human trafficking legislation. We reserve the right to audit any of our suppliers for conformance. If we were to find evidence of a failure to comply, we will take immediate action, which will include terminating our relationship with the relevant supplier if appropriate.

### Our expectations of you

To ensure we comply with our requirements on Anti-Slavery and Human Trafficking you must:

- Take all measures to ensure that neither modern slavery nor human trafficking takes place within our Group or supply chain in accordance with applicable laws;
- Act in good faith with regard to concerns and raise to your line manager in the first instance.

## 5.7 Equal opportunity, discrimination and harassment

We treat everyone fairly and with respect and dignity, giving everyone equality of opportunity.

We will not tolerate any form of discrimination, bullying, harassment or victimisation of others and any such behaviour reported will be investigated and action taken up to and including the dismissal of those found to have committed such acts.

### Our expectations of you

To ensure we comply with our requirements on equal opportunity, discrimination and harassment, you must:

- Base work-related decisions on merit and not on race, colour, national origin, ethnicity, sexual orientation, religion, sect, gender, age, marital status or any other characteristic which is irrelevant;
- Not instigate or participate in actions which can reasonably be considered to be offensive or derogatory to any other person or group of people, for example making inappropriate jokes or being sexually offensive; and
- Help create an inclusive work environment that is free from bullying, harassment or victimisation.

## 5.8 Diversity and inclusion

We value the unique contribution that each of us brings to the company and we believe by bringing together different talents within the workplace we get the best solutions. We recognise that for everyone to fully contribute at work, our workplace needs to be a place where everyone feels equally respected for who they are and what they contribute without fear of harassment, bullying or prejudice.

## Our expectations of you

To ensure we comply with our requirements on diversity and inclusion you must:

- Treat others with respect and as they would expect to be treated;
- Encourage others to contribute and speak up;
- Actively and inclusively listen to what is said;
- Be respectful of cultural, religious and personal style differences and seek to understand how these differences impact communications;
- Be a role model for their team and colleagues;
- Show zero tolerance of behaviours which demonstrate a lack of respect and/or the exclusion of colleagues; and
- Make decisions based on fact and objective criteria.

In addition to the above, we expect managers to:

- Develop team behaviours that embed inclusion into daily work practices.

## 5.9 Charitable and community activities

We contribute to local community and charitable initiatives via an established programme of community and education activities where we provide financial and people resources to support local initiatives and raise awareness of engineering career pathways. We do not usually support charitable activities outside of this programme.

If you have your own charitable or community activity, the company has no issue with you seeking support for such activities amongst your work colleagues, as long as it does not interfere with your work and it is explicitly made clear that the company is not involved.

## Our expectations of you

To ensure we comply with our requirements on charitable and community activities you must:

- Be familiar and comply with company charitable and communities contribution statement and ensure that any request for support meets this statement;
- Listen to concerns from the community and direct them as applicable.

## 5.10 Public communications

The company reputation is a key asset and we must behave in a manner that reflects well on our brand and ourselves and builds trust.

## Our expectations of you

To ensure we comply with our requirements on public communications you must:

- Act in a way that protects or enhances our reputation and brand at all times;
- Only provide information that is accurate and consistent with our values;
- Be mindful and use care and good judgement when speaking about our business or people, including when on social media and when not in the workplace;
- Use good judgement and take care when interacting with content on social media;
- Seek permission from your line Manager before accepting any invitation to present externally your work or anything relating to the business;

## Our Code of Conduct

- Not use any non-public information about our business or other companies in public communications;
- Not use social media to post or display information about the company and its stakeholders that is vulgar, obscene, threatening, intimidating, harassing, libellous or discriminatory.