

CODE OF CONDUCT

Policy and Procedures

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Code of Conduct Version Control

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Introduction

The Seiche Water Technology Group ('SWTG') Code of Conduct Policy outlines the expectations regarding the behaviour of all of us with respect to our colleagues, company business and information.

We promote freedom of expression and open communication but expect everyone to follow this Code of Conduct. We should all avoid offending, participating in serious disputes and disrupting our workplace. Everyone is expected to foster a well organised, respectful and collaborative environment.

Application

This policy is applicable to all staff at all levels of the organisation.

As part of the organisation's induction process, new starters will be provided with this policy and shown where it is located on the organisation's intranet. The HR HSEQ department is responsible for informing job applicants of this policy. Staff are responsible for informing their visitors to the premises of this policy.

Policy Elements

What are the components of an Employee Code of Conduct Policy?

All staff are required by their contract to follow the Code of Conduct whilst performing their duties; the components are outlined below.

Compliance with Law

The duties of an employee are embodied in Common Law and built on by Statute, e.g. The Equality Act 2010, The Health and Safety at Work Act 1974, The Prevention of Corruption Act 1906 and 1916.

Under Common Law the duties of an employee are as follows:

- To be ready and willing to work;
- To offer their services personally – must not subcontract the work for which they are employed;
- To take reasonable care in the exercise of that service, including the duty to be competent at work and to take care of the company's property;
- To not wilfully disrupt the company's business;
- To obey reasonable instructions as to the time, place, nature and method of service;

- To work only for the company in the company's time;
- To disclose information to the company relevant to the company's business, e.g. that they might know or discover;
- In general, to be of good faith and do nothing to destroy the trust and confidence necessary for employment;
- To account for all benefits, monetary or in kind, received in the course of employment;
- To not give or receive bribes or otherwise act corruptly; and
- To indemnify the employer for loss caused by the employee

UK Statute places further responsibilities on individual employees regarding their own behaviour and their behaviour towards other employees.

All employees must protect the company's legality. They should comply with all environmental, safety and fair dealing laws. The company expect employees to be ethical and responsible when dealing with our company's finances, products, partnerships and public image.

Respect in the Workplace

All staff should respect their colleagues. Any kind of discriminatory behaviour, harassment or victimisation will not be tolerated. All staff should conform with the organisation's equal opportunity policy in all aspects of their work.

Staff should not treat their colleagues less favourably on the grounds of pregnancy, race, colour, nationality, ethnic origin, religious or political belief, age, gender, sexual orientation, marital status or disability.

Regardless of position within the company, no staff member should behave in a manner that deliberately undermines any of their colleagues.

Staff should not criticise, abuse or ridicule, either in public or private, written or verbal, any colleague/service provider, which humiliates and/or demeans the individual(s) involved.

Staff should not make any unwanted approaches, physical, verbal or non-verbal, to any of their colleagues.

Protection of SWTG Property

All property of SWTG, whether material or intangible, should be treated with respect and care.

- Staff should not misuse the organisation's equipment or use it frivolously;
- Staff should respect all kinds of intangible property. This includes trademarks, copyright and other property (information, reports, etc). Staff should use them only to complete their job duties

Staff should protect the organisation's facilities and other material property (e.g. company cars) from damage and vandalism, whenever possible.

Professionalism

All staff must show integrity and professionalism in the workplace:

Dress Code and Personal appearance – All staff should follow the company's dress code. Staff are expected to be neat and tidy and dressed appropriately for their role.

Staff are expected to maintain personal appearance; the standard of personal appearance should be fit for purpose and convey a favourable impression of the company/service.

Staff are expected to practice daily hygiene and good grooming habits.

Corruption and Bribery – Staff are discouraged from accepting gifts from clients and partners. Bribes are prohibited for the benefit of any external or internal party. If a staff member bribes, or attempts to bribe, another person this will be considered gross misconduct. Similarly accepting or allowing another person to accept a bribe will be considered gross misconduct.

Job duties and authority – All staff should fulfil their job duties with integrity and respect towards customers, stakeholders and the community. Supervisors and managers must not abuse their authority; It is expected of them to delegate duties to their team members considering their competences and workload. Likewise, team members are expected to follow team leaders' instructions and complete their duties with skill and in a timely manner.

Transaction of Private Business – Staff having official dealings with contractors and other suppliers of goods or services must avoid transacting any kind of private business with them. No favour or preferences as regards price, or otherwise, which is not generally available, should be sought or accepted.

Absenteeism and tardiness – Staff should follow their work schedules. We can make exceptions for occasions that prevent employees from following standard working hours, but generally staff are expected to be punctual when coming to and leaving from work.

Conflict of Interest – Staff are expected to avoid any personal, financial or other interests that might hinder their capability or willingness to perform their job duties.

Collaboration – Staff should be friendly, collaborative and should try not to disrupt the workplace or present obstacles to their colleagues' work.

Communication – All staff should be open for communication with their colleagues, supervisors or team members.

Confidentiality – At all times confidentiality must be maintained. No information can be released to unauthorised persons or organisations. The Board of Directors will inform staff of those authorised to receive information. If doubt exists as to the validity of an organisation or individuals to receive information, this must be checked with a Senior Manager.

Benefits – Staff should not abuse employment benefits. This can refer to time off, facilities or other benefits the organisation offers.

Policies – All staff should read and follow all the SWTG policies. If there are any questions, please ask your line manager or Human Resources (HR) department.

Employee Handbook – All staff should read and follow the information contained in the employee handbook, as it provides information on employment policies and procedures and forms part of the terms and conditions of employment.

Whistleblowing – SWTG is firmly committed to the highest possible standards of integrity, honesty, openness, and accountability. Whistle blowing procedures are necessary for promoting a culture of openness and integrity. If a staff member has a well-founded concern, the whistle blowing policy will enable them to raise these concerns in an appropriate and effective way. If a staff member does raise a concern, they will be protected from victimisation provided that their concern falls within the detailed criteria specified in the Public Interest Disclosure Act.

General Conduct – Staff should always conduct themselves in such a way as to enhance the reputation of SWTG. Staff who become aware of and are willing to report breaches of this policy or who genuinely

believe that a breach is occurring, has occurred or is likely to occur within the business, will be supported by the organisation. Staff members should raise the issue internally with their line manager or supervisor or in accordance with SWTG policy on disclosing information (whistleblowing).

These standards of conduct are intended to underpin and clarify standards required by SWTG of its staff and form a fundamental part of the employment contract. Staff who fail to comply with the guidance detailed in this policy could be subject to, following full investigation, disciplinary action up to and including dismissal. If through their actions or omissions staff are found to be in contravention of either this policy or, indeed, their legal responsibilities then SWTG reserves the right to take legal action if it deems it to be necessary to do so.

Disciplinary Actions

SWTG may have to take disciplinary action against staff members who repeatedly or intentionally fail to follow the Code of Conduct. Disciplinary actions will vary depending on the violation.

Possible consequences include:

- Demotion
- Reprimand
- Suspension or termination for more serious offences
- Detraction of benefits for a definite or indefinite time

We may take legal action in cases of corruption, theft, embezzlement or other unlawful behaviour.

Maintaining this Policy

SWTG will monitor the effectiveness of this policy and its general compliance within SWTG.

This policy will be kept up to date and amended accordingly to reflect any changes in response to revised legislation and applicable standards and guidelines.

This policy is fully supported by the board of directors of SWTG. In support of this intent, the policy will be reviewed at least annually. SWTG will provide sufficient financial support and all other necessary resources for the full implementation of this policy.

Approval for this Statement

This statement was approved by the Board of Directors on 14 November 2022.

Name Roy Wyatt

Signature 

Date 14 November 2022

Code Principles: A shared responsibility to...

Our Heritage

- ✓ Know and comply with the Code and speak up if you have concerns or suspect any breaches
- ✓ Comply with applicable laws, regulations and policies wherever you operate in the world
- ✓ Protect confidential information – trust is essential to our business success
- ✓ Practise sound decision-making

Our Customers and the Marketplace

- ✓ Ensure ethical business practices – always deal fairly and in good faith and never take unfair advantage of anyone through manipulation, concealment or abuse of privileged information
- ✓ Never offer, give, solicit or receive anything of value if it is intended to give, or appears to give, an improper business advantage or benefit

Our Organisation and Shareholders

- ✓ Protect all the Organisation's assets – our physical assets, information, intellectual property and business relationships
- ✓ Avoid personal conflicts of interest, inside and outside of the workplace
- ✓ Communicate responsibly – seek authorisation to speak on behalf of the organisation, and use good judgement on social media

Each Other

- ✓ Treat others with dignity, and respect the diversity of cultures, backgrounds and experiences
- ✓ Do your part to promote a safe workplace, and report any activity that can pose a threat to others

Our Neighbourhood and Communities

- ✓ Recognise your responsibility as a global citizen – give back to the communities where you work and live, and do your part to reduce environmental impact of our operations