

## M02 - Ethical Policy Statement

### Responsibility & Accountability

Each employee at Metclad Contracts Ltd is responsible for his or her own behaviour. While performing your job duties, you are responsible for ensuring that you conduct yourself in a manner that reflects positively on the Company. As a condition of employment, every employee's personal responsibilities include:

- Complying with all applicable laws and regulations
- Complying with all applicable Company Policies
- Maintaining appropriate ethical behaviour
- Reporting any suspected misconduct illegal activity, fraud, abuse of Company assets or other violation of ethical Standards

### Employees

We believe in treating people with dignity and providing equal employment opportunity for all employees, including recruiting, compensation, professional development and promotion. We believe in respecting human rights, providing safe and healthy working conditions, and respecting employees' rights to bargain collectively. We do not want others to ask our employees to do anything wrong and, likewise, will not ask anyone else to do anything wrong.

### Vendors and Suppliers

We choose vendors and suppliers objectively and strive for honesty in all business dealings with them. We will make purchasing decisions on the basis of such factors as price, quality, delivery, service and integrity. We adhere to the highest professional, industry and personal ethics.

### Equal Opportunity

All employees deserve a workplace where they feel respected and appreciated. Our policies are designed to ensure that employees are treated fairly and with respect, by the Company and each other. Metclad evaluate, transfer, compensate and promote employees based on skills and performance, and not on any unlawful considerations. If you feel you are a victim of discrimination, you have a right to voice your concerns. You can tell your supervisor or any other member of management.

### Harassment-Free Workplace

Harassment may occur when the words, actions or behaviour of members of the work group create an intimidating, hostile or offensive work environment. This type of harassment can be destructive to a positive work environment and will not be tolerated. Unwelcome sexual advances or other inappropriate personal conduct are prohibited. Sexual harassment may take many forms, including but not limited to, overt advances to demeaning comments, jokes, language and gestures. We will not tolerate abusive language, physical violence or the threat of physical violence.

### Safety and Health

We are committed to providing a safe and healthy work environment. There are extensive local and national laws designed to promote a safe workplace and these laws are strictly enforced. Extensive and continuous training and regular safety audits are essential for understanding and complying with safety laws.

## Conflicts of Interest

The Company respects the rights of employees to manage their personal affairs and investments and does not wish to intrude upon their personal lives. At the same time, employees should avoid any situation that may involve a conflict between their personal interests and the interests of the Company. As in all other facets of their duties, employees' dealings with customers, contractors, competitors or any person doing or seeking to do business with the company must be in the best interest of the Company to the exclusion of consideration of personal preference or advantage. A "conflict of interest" occurs when your private interest interferes in any way with the interests of the Company. A conflict can arise if we take on outside work or make financial investments that make it difficult for us to perform our work objectively and effectively. A conflict also can occur if employees or members of their family receive personal benefits as a result of the employee's position in the Company.

## Receiving Gifts, Favours and Entertainment

Employees should neither seek nor accept for themselves or others any gifts, favours or entertainment without a legitimate business purpose, nor seek or accept loans (other than conventional loans at market rates from lending institutions) from any person or business organisation that does or seeks to do business with, or is a competitor of, the Company.

## Giving Gifts, Favours and Entertainment

Gifts, favours and entertainment may be given to others at Company expense only if they meet all the following criteria:

- Consistent with customary business practices
- Not excessive in value and cannot be construed as a bribe or pay-off
- Not in violation of applicable law or ethical standards
- Public disclosure of the facts will embarrass neither the Company nor the employee

## Bribes and Kickbacks

It is unacceptable to directly or indirectly offer, pay, solicit or accept bribes or kickbacks in any form. Under some statutes, such as the Foreign corrupt Practices Act, these are criminal actions that can lead to prosecution.

This policy is in compliance with the Equality Act 2010.

This policy is in compliance with the Anti-Bribery Act 2010.

For & on behalf of Met-Clad Contracts Ltd

A handwritten signature in black ink, appearing to read "T.C. Millichap".

T.C. Millichap  
SHEQ Director  
February 2022

Date of Review	Summary of Changes
23 <sup>rd</sup> May 2013	No Changes
23 <sup>rd</sup> May 2014	Reviewed and no changes made
12 <sup>th</sup> June 2015	Reviewed and no changes made
18 June 2016	Reviewed and change made to role title to Health and Safety Director
20 <sup>th</sup> March 2017	Reviewed and statement added confirming this policy is in compliance with Equality Act 2010.
January 2018	Reviewed personnel updated with formatting Bribery act 2010 specifically referenced.
Jan 2019	No changes
Jan 2020	Reviewed signature date added
Jan 2021	Reviewed and no changes
	Reviewed, minor correction.