

Code of Ethics & Business Integrity





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NOTES:

Foreword

Dear Colleagues,

Chartway was founded in 1992. The business philosophy was to provide a range of High Quality Precision Engineering Services combined with First Class Customer Care, and has remained at the forefront of everything we have adhered to over the last 28 years.

Our core values are contributors to our success. They serve as a compass that guides the way we work with our customers, suppliers and each other.

In order to cement our values and to be able to show that Chartway views ethics and integrity as being an important part of how we conduct business, we are providing this code to all our employees.

The principles of the code are simple and clear. Comply at all times with applicable laws and regulations, act with integrity and honesty and avoid inappropriate behaviour, or even the appearance thereof. It is the personal and obligation of every employee to adhere to these principles.

This Code of conduct provides useful guidance in making sound ethical business decisions in your day to day work and to help you approach the issues around compliance and ethics with confidence and certainty.

Chartway has built a reputation over the last 28 years and can be harmed by just a single employee and a thoughtless action or decision. I hope you will join me in demonstrating the highest levels of integrity in all that we do. This code aims to aid you in this achieving this.

Yours Sincerely



John Clark – Managing Director.

Our Core Values

Chartway's core values are ingrained and are the very fabric of the company. They serve as a compass that guides the way we work.

The Chartway Code of Ethics and Integrity further defines the values of Integrity and Respect.

At the very heart of the code is the general principle that we should always act with honesty and integrity in all matters. At Chartway we define integrity as "Doing the right thing".



RAISING AND REPORTING INTEGRITY ISSUES

We all have the obligation to promptly report any known or suspected violations of the Code, as well as any violation of applicable laws and regulations. Infractions shall be reported by email to compliance@chartway.co.uk.

If you need guidance about whether a situation violates the Code or if you have any questions about a compliance issue please contact your line manager or another manager you trust.

Reprisal, threats or retaliation against any person who has reported a violation in good faith or who is assisting in an investigation, is prohibited. Any such retaliation is itself a violation of the Code and will result in disciplinary measures. Chartway will always take the necessary measures to protect employees. Reporting misconduct – actual or suspected – allows us to investigate problems, stop any misconduct and prevent future issues.

DISCIPLINARY MEASURES

If there is a violation of the Code, the Management Team will sanction the relevant employee(s) in accordance with the procedures and policies of Chartway. Disciplinary measures can result in dismissal or any other legal actions necessary to preserve Chartway's interests.

SUPPORTING POLICIES

All policies specifically mentioned in this booklet are available upon request. For Chartway employees they can be found in the policies folder on the intranet system. This Code of conduct can be found on our website – www.chartway.co.uk in the downloads section

Social Responsibility



Local Community

Chartway supports its local community and nominated charities.



Human Rights

Respect for the individual is key for Chartway and part of our core values. We will never tolerate slavery, child labour, forced or compulsory labour or human trafficking.



Ethical Sourcing

We will never knowingly procure materials from conflict condition countries. All materials used in manufacture of our components can be traced back and material certificates are available



Environment

We are committed to reducing our environmental impact. We actively recycle as much waste as we can. We are lowering our annual energy consumption and have invested in energy saving technology such as our BIOMASS boiler system and LED lighting across our site.

Ethical Decision Making

The principles described in the Code cannot cover all daily situations. In all cases we should as individuals assess the appropriateness of our actions according to the following guidelines to ensure there is no breach of our Code.

Before making a decision or acting, ask yourself the following

- Is it legal?
- Is it consistent with our Code?
- Am I setting the right example?
- Would I want people to read about it in the newspaper?
- Is there someone I can talk it through with?
- Who else is affected by my action/decision?
- How does this affect the business?

We will update our code continuously to ensure it is relevant and in keeping with current laws, policies and best practices.

“When in doubt always seek advice”

Compliance with our code

Our code is applicable to all employees. Directors, Managers and both full and part time employees.

It is our personal responsibility and obligation to adhere to the principles of the code. These principles are both simple and clear. At all times abide by the law, act with integrity and honestly and avoid behaviours or situations that would cause the above to be compromised.

We are all required to read and fully understand the requirements of the code and undertake yearly certification in the form of a questionnaire to ensure consistency and ensure application in our daily business.

Chartway conducts business with suppliers and customers worldwide. Every country has different laws and regulations that are applicable to how we conduct our business.

Therefore, we must always act in full compliance of the laws and regulations in force. Should the local laws allow activities or actions that are in breach of our code of conduct. Our code will take precedence at all times.

In this respect we would also expect any third party we do business with to respect and act in accordance with our high values and ethical principles.

If in doubt, you should always seek the advice of a manager or director. It is better to wait and take the correct action than to make a decision that can compromise the reputation of both the company and you personally.

Core values such as Safety and Integrity will always be put above any business decision or opportunity.



Protecting our people

Preventing Discrimination and Harassment

All persons at Chartway will be treated equally with dignity and respect, regardless of their personal traits, beliefs or national or ethnic origin, culture, religion, age, gender and sexual orientation, political conviction, mental or physical ability.

We commit ourselves to providing a workplace where all employees are treated fairly and free of discrimination.

In addition, any form of harassment and/or bullying will not be tolerated. Any behaviour that has the purpose or that results in creating an intimidating, offensive, degrading or humiliating workplace is strictly prohibited and will not be tolerated.

Equal Opportunities

As a company that deals in international markets, we believe this should be reflected in the composition of our workforce. This can only be achieved if we ensure that everyone is treated in the same way and that everyone has equal access to opportunity.

We ensure through our internal recruitment procedures and development reviews that the same criteria for employment and promotion is used. Personnel are recruited and promoted based on their personal competencies, contribution and potential.

Data Protection

Everyone within Chartway provides personal information which is required for successful operation of the business. This information is only to be used for appropriate business purposes and is properly safeguarded.

Anyone who has access to management drives and personal data other than their own, must treat it in accordance with all applicable legal requirements, including laws on privacy and data protection. Personal data and sensitive business information shall not be shared without authorisation and only for the strict purpose of a business need.

“All persons at Chartway will be treated equally with dignity and respect”

International Trade Laws

As we do business across the globe, we are subject to many different international trade laws and regulations.

We commit to comply with the applicable laws of the countries we are working in.

We must also make sure that we comply with the applicable national and multinational sanction regulations. These sanctions prohibit for example certain activities or payments or hiring people that are listed in the regulations.

Anti-Money Laundering and Counter Terrorism Financing

Money laundering is the channelling of money generated from illegal activities through legitimate entities in order to conceal the source of the funds or give the source an appearance of legality. Money laundering also includes money that can be used to fund criminal activities including terrorism.

We must be on the lookout for suspicious activities and requests when payments are to be made by Chartway or to Chartway. If you see something suspicious or have concerns notify your manager immediately.

Accounting Standards and Records

In order to make sure we have correct information regarding our finances we must take care that data or information provided is complete, reliable and accurate. This includes but is not limited to internal and external finance reporting, expenses, invoices, payroll, employee records and operating reports.

All such information can have an impact on decision making and business strategy.

Incomplete, false or misleading information whether by accident or purposely can lead to wrong business decisions and in some cases can even violate the law.

“We must be on the lookout for suspicious activities and requests”

Anti-trust and competition

Anti-trust/competition violations distort equal competition between companies and the correct functioning of the economy. Sharing of sensitive information that can affect Fairtrade and price fixing are examples of Anti-trust violations.

Chartway shall not enter into any understanding, agreement or scheme, express or implied, formal or informal with any competitor in regards to prices, terms or conditions of sale or service, production, distribution or customers

Third Parties

In our daily business we also deal with individuals whom are not employed by Chartway or entities which are not owned or controlled by Chartway and who provide services or engage in business activities with or on behalf of Chartway (Third Parties). They can be either individuals or companies, governmental or non-governmental.

Private Individuals or Privately Owned Companies

We can be held legally liable for the actions of Third Parties such as subcontractors. Hence we have the obligation to notify Third Parties about our Code and Chartway's zero tolerance approach to corruption at the start of any relationship and, as appropriate, thereafter. We need to ensure that any Third Party we are doing business with complies with our Code as we are expected to. Therefore, we should perform compliance check when selecting any Third Party we would like to do business with. In the course of the business process we shall regularly monitor our business partners to prevent any misconduct.

Public Officials

Due to our business activities we do not regularly interact with public officials but it is important to know that in most countries laws for interacting with public servants are stricter than laws for dealing with employees of privately owned companies. You should always know and strictly adhere to the laws, regulations or rules that apply and exercise extra caution when interacting with public officials.

“Third Parties we do business with, must act with the same ethical standard as we do”

Protecting our people

Health and Safety

Health and Safety is our North Star. We monitor our safety performance daily against our zero harm objectives.

The company strives to provide each employee with a safe and healthy working environment. We all have the responsibility to maintain a safe workplace for others and ourselves by complying with health & safety rules and practices, reporting accidents, injuries, near misses and making behavioural based safety observations daily.

Our obligations for health & safety extend beyond our own premises. We are bound to ensure all goods despatched are packaged safely, maximum dimensions and weights are adhered to and the correct method of containment is applied. It is our responsibility to check cargo is secured on the delivery vehicle. Even if the vehicle is owned by a third party.

There is no place for compromise in Health & Safety.

For further details refer to the Health and Safety policy

Drugs and Alcohol

The use of drugs and alcohol within the workplace is not tolerated. Any employee found under the influence whilst at work will be sanctioned and will face disciplinary action.

For further details refer to the Drugs and Alcohol policy

Security

In order to create a safe and secure workplace we expect each and every employee to act in a security conscious manner and to ensure that external parties (visitors, contractors, service providers etc) present on our premises or handling information act accordingly.

Employees are asked to challenge anyone they see who they don't recognise who is unaccompanied or does not have a visitor pass and/or the correct PPE.

Any concerns should be immediately raised with your line manager, or senior management.

For further details refer to the Visitor's Procedure and Security Policy

“Health and Safety is our North Star”

Protecting company assets

Physical Assets

A physical asset is something which Chartway has acquired, owns or holds and that has or can have a monetary value (e.g. equipment, vehicles, tools and supplies etc)

All Chartway employees shall use physical assets in a safe, legitimate and efficient way. Chartway employees can use the physical assets solely for business purposes related to Chartway. We are obliged to manage the physical assets with due care and shall safeguard and protect Chartway's assets to the best of our abilities from amongst others: loss, damage, misuse and fraud. Any type of theft, fraud or embezzlement of company assets will not be tolerated and will result in disciplinary action.

At the end of the contractual relationship with Chartway, Employees are obliged to return all the physical assets that they received during their career.

Confidential Information

Intellectual property and confidential information must be safeguarded at all times. We are only allowed to disclose information to third parties when we are authorised or legally required to do so. We must use the intellectual property of Chartway and any confidential information for what it is intended for. This means you can only reveal this information with colleagues who have a business need to know it. It is gross misconduct to share personal information about an employee with others either internally or externally without authorisation and goes against our Code of Conduct (this code). Care must also be taken to avoid unintentionally divulging information e.g. miss sent emails or overheard conversations. Information whether personal or business related should be handled with the necessary pre cautions and not used carelessly. Do not leave your laptop or tablet open/logged in whilst you are away from your desk. Documents and files should not be left out or left in places where access can be attained without your knowledge.

At the end of the contractual relationship with Chartway, Employees are obliged to return this information and any intellectual property and confidential information.

External Communication

You may never assume the role of spokesperson of Chartway unless specifically authorised to do so. Social media has become a part of everyday life and can be an effective communication tool. However, everyone should understand that careless use can pose unnecessary risk to Chartway's reputation or confidential information. To prevent this Chartway has clear guidelines on social media.

For further details refer to the social media policy

Ethical business practices

Anti-Bribery and Anti-Corruption

Chartway is committed to conducting its business with integrity. Therefore, we do not and will not tolerate corruption or bribery in any form.

No one with Chartway shall at any time offer, promise, give, request, agree, receive or accept bribes. As such we must be extremely careful in our business dealings. A bribe can take many forms and is not always obvious.

Payments

In some country's payments are given and accepted as a method of speeding up a decision or process. They are called facilitation payments and are prohibited.

Chartway makes no distinction between bribery and facilitation payments. Payments big or small are not acceptable.

Payments made in situation where we are confronted with extortion or exertion of force will not be considered a facilitation payment. There are situations where your safety and liberty or that of a colleague is under threat and there is no alternative but to pay. These extortion payments will be permissible under duress but the situation must be reported to the directors immediately.

Gifts and Hospitality

Gifts and hospitality often seem innocent but can have other motives. Certainly, they can contribute to strong working relationships in appropriate circumstances but they can easily create the impression of influencing an action or pending decision.

As a general rule employee should only give or accept gifts where it is reasonable, proportionate and appropriate in the circumstance. Never in order to secure improper advantage or to directly influence a decision.

“Chartway is committed to conducting its business with integrity”