

CODE OF BUSINESS CONDUCT



Policy Statement

SCCS is committed to undertaking its business operations in ethical and responsible manner. It will comply with all legislation applicable.

This code of conduct sets out the standards of conduct expected of its personnel and all stakeholders with whom it conducts its business.

It should be read in conjunction with all other SCCS policies and procedures.

This code of conduct:

- Describes the principles by which the Company expects to conduct its business.
- Provides employees with a summary of the standards expected when acting on behalf of the Company.
- Re-enforces a Company culture of working with integrity, thus protecting the reputation of the business.

Scope

This policy statement applies to:

- All personnel of SCCS whether permanent or temporary or agent or contracted.
- As a condition of working with us, business partners must agree to comply with our Supplier Code of Conduct.

Definitions

“**Company**” shall mean SCCS.

“**Senior Management Team**” shall mean Regional Director, Operations Director and such other personnel deemed appropriate.

“**Management Team**” shall mean Regional Director, Operations Director, Line Managers, and such other senior personnel as deemed appropriate.

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| Policy Reference: | 011.1.2022.CD |
| Revision No: | 3 |
| Date of 1 st Issue: | 10/02/2022 |
| Date of Revision: | 17/11/2023 |
| Reviewed by: | Roz Wankling |
| Approved by: | Kevin Smith |

Policy Aim & Commitments

Company Commitment:

The Company is committed to:

- Ensuring the highest standards of business integrity within its operations (including its business partners and supply chain).
- Compliance with all current application laws/legal obligations.
- Conduct its operations in accordance with accepted best practice standards/industry standards.
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- Compliance with all current application laws/legal obligations.
- Conduct its operations in accordance with accepted best practice standards/industry standards.
- Conduct its operations in a transparent manner.
- Strive to operate in a manner that reduces the impact of its operations upon the environment.
- Ensure all its personnel (and any agent acting on its behalf) are suitable trained on the content of this and all related Company policy.

Employee Commitment:

Employees are required to:

- Work as trained and in accordance with Company policies (to include, but not limited to) Anti-Bribery, Anti-Slavery, Whistleblowing, GDPR, Ethical Trading, Cyber Security, Health & safety, Worksafe Policy, Drugs & Alcohol Policy and Counterfeit Goods policy).
- Act in an honest, fair, and transparent manner within the conduct of their work.
- Work in a manner which would not discredit themselves or the Company and would not result in a conflict of interest.
- Work in a manner which is compliant with the laws applicable to the operations of the Company.
- Avoid and flag potential conflicts of interest.
- Treat other SCCS personnel, agents acting on behalf of SCCS, SCCS business partners and supply chain with respect within their dealings.

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- Flag any/all operational concerns (for resolution) as set out in this Code of Business Conduct and other applicable Company policy (such as the Company Whistleblowing Policy).

When to raise concerns

This policy should be read in conjunction with the Company Whistleblowing policy and Ethical Trading Policy.

Consider any actions or omissions which may not be consistent with the following Company principles:

- Working in an inclusive culture where all personnel are to be treated with equal respect and have equal opportunity based on their skills and interests.
- Working in an environment free of discrimination, harassment, and victimisation.
- Working in an environment free of exploitation or enforced/involuntary labour of any form.
- Working in an environment where personnel receive payment/salaries on time and in compliance with applicable laws.
- Working in an inclusive culture where all personnel are to be treated with equal respect and have equal opportunity based on their skills and interests.
- Freedom to work in environment where your health & safety will not be placed at risk.
- Working in an environment where personal data, company data and the data of our stakeholders is protected in accordance with GDPR regulations.
- Conduct of business in a manner which would not create an actual or potential conflict of interest (misuse of personal position, influence by personal financial incentive or other gain, offer of personal enrichment, having a personal interest in a proposed supplier or company).
- Not conducting business in any manner which would be considered anti-competitive, an abuse of a dominant marketplace position or in a manner which would impose unlawful restrictions on our business partners.
- Not engage in activities which may be considered or viewed as corruption (abuse of power for private gain). This may include bribery, fraud, money laundering and embezzlement.
- Not accept gifts of other benefits which may be considered to unreasonably influence the recipient's decision making. The Company has a register for registration of gifts. If in doubt personnel should always refer to Company policy and flag concerns.
- Not engaging in external activities which would not be compatible with duties to the Company.
- Ensure business is conducted in compliance with export control and trade sanctions applicable to ensure goods supplied by the Company are not found in the possession of sanctioned countries or un-authorised end users.

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- Operate in accordance with best environmental practices to foster a culture of environmental sustainability.

This list is not exhaustive. If something seems/feels wrong- report your concern(s).

How to raise concerns

All concerns should be reported in accordance with the Company Whistleblowing policy.

Protection & Confidentiality

The Company is committed to fostering a culture of best practice and this includes supporting any person raising any concern.

Any person raising any concern shall receive full support from the Management Team and all concerns will be taken seriously (receiving full and proper investigation).

No person raising any concern shall suffer disadvantage.

Compliance Monitoring

The Senior Management Team will be responsible for managing the overall compliance with the remit of this policy.

The Management Team shall be responsible for taking steps to promote and monitor compliance with the code.

This will include, but not be limited to, encouraging employees to ask questions, make suggestions and report wrongdoing without fear of reprisal.

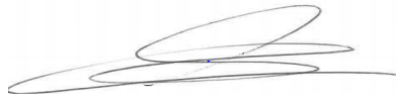
The Management Team are responsible for managing corrective action resolution, in accordance with Company policy and practices.

Management may delegate these responsibilities as felt appropriate.

Review

The Management Team are responsible for the appropriate review of the remit of this policy and its appropriateness of it to meet Company objectives and legal obligations (which may be delegated to other personnel as deemed appropriate).

Signed:



Print name: Kevin Smith

Position:

Regional Director UK

Date:

17th November 2023

Revision

3

Next review:

16th November 2024