

Code of Business Conduct Policy **HARWIN**

Harwin plc, and all Harwin Group Companies, will conduct their business to the highest standards of honesty and integrity and we expect our clients and suppliers to do the same.

Our responsible trading ethics assist us to make informed decisions about the business opportunities we pursue and help employees apply our values in their decision making.

WHAT OUR CODE MEANS:

- We will always conform to relevant law and believe that all organisations should avoid causing any adverse effect on the human rights of people in the businesses we deal with.
- We take a robust approach to slavery and human trafficking, both ourselves and within our supply chain (see separate slavery and Human Trafficking Policy).
- We seek to minimise so far as we reasonably can the impact of our activities on the environment.
- We comply with the law in the conduct of our business.
- We are honest in our dealings with those with whom we do or seek to do business.
- We will not tolerate any wrong doing or impropriety in the way we go about our business.
- We will not bribe or attempt to bribe anyone.
- We will not take bribes from anyone.
- We will be diligent in selecting our business advisers and partners so that we minimise the risk of our reputation being damaged by others.
- We will implement and observe appropriate training and procedures to ensure that we and others working for us understand what our Code of Business Conduct means for them in practice.
- Our staff and business advisors must comply with our Code and we will treat seriously any breaches of our Code or its associated Guidelines.
- We respect the dignity and rights of our employees and place the highest priority on ensuring the safety of each other at work and the safety of others who might be affected by our activities.
- Our Business Partners must be willing to subscribe to our Code or have equivalent standards and procedures in their own business.