



People Policies – Ethics Policy

1. Introduction

This is a non-contractual policy. This policy outlines the Company's ethical stance towards carrying out business and helps to communicate this to all its people within the Company. Munnelly Group are committed to responsible corporate behaviour and aim to deliver the highest of standards to our people and clients whilst operating ethically and with fairness and integrity. It is fundamental that every individual carries a share of the responsibility for our conduct and contributes to our success.

The person responsible for the Ethics Policy is Paul David Munnelly, Chief Operating Officer.

2. Definition

A code of ethics sets out the expectations that the company has for how its people should behave in any given situation, to assist with decision-making. Ethical considerations affect the Company's treatment and stance towards all its people, suppliers, and customers.

The Company has principles and ideas that it follows and upholds in all its interactions, whether internal or external. The Company ensures through its management and people that it adheres to these principles.

3. Our Ethical Stance

As a Company our ethical principles are as follows (but not limited to):

- **Integrity** – We demand of each other and ourselves the highest standards of individual and corporate integrity. We do the right thing, because it is the right thing to do. Abiding by legislation and caring for others.
- **Excellence** – We routinely challenge ourselves to improve our products, services and processes. We strive to always to understand our customers businesses and help them achieve their goals.
- **Teamwork** – We foster an environment that encourages innovation and creativity and deliver results through collaboration and encouraging open and effective communication and interaction.
- **Trustworthy** – Morality and truthfulness.
- **Reliable** – Consistency, stability and dependable.
- **Respect** – Treating everybody with respect and dignity and understand boundaries and privacy.
- **Fairness** – Accepting, equality and best practice.

Any deliberate failures to comply with, or decisions to deliberately deviate from, the ethical principles of the Company may trigger the need for disciplinary action to be taken.

4. Customer Relations

We consider that the cornerstone of developing a sound and mutually successful customer relationship is based upon our integrity in relation to all aspects. Our performance will be such that we will fully and consistently meet our contractual obligations in a diligent and professional manner. We will take every step to ensure that in our commercial dealings all relevant facts are reliably and truthfully represented.

Our people may not offer any personal inducement whether monetary, gifts or otherwise of any material value to a customer (beyond reasonably acceptable small tokens and hospitality) which may be implied as a bribe or form of improper transaction to gain unfair advantage.

We will treat all customer's information with the same degree of care as we apply to secure our own confidential information.

5. Supplier & Contractors Relations

We aim to foster and engage in long-term and beneficially rewarding relationships with our suppliers and contractors. We recognise that the performance of our suppliers and contractors is a vital element in satisfying our customers and we will strive to maintain strong and effective communications. We will be receptive to developing collaboration arrangements with our suppliers and contractors based upon mutual interests and trust.

We will only work with contractors and suppliers that have the same ethical business standards that we adhere to. This includes the requirement for contractors and suppliers to have a policy in place to ensure labour exploitation, slavery and human trafficking are not taking place in any part of their operations or supply chain. We will not tolerate abuses of human rights.

6. Public & Interested Party Relations

In conducting our operations, we will be sensitive and responsive as far as is practically feasible to the views and concerns of interested parties. We will apply all efforts to minimise inconvenience, disturbance or any disruption directly or indirectly caused to local communities or others by our activities.

We aim to regularly communicate with communities who may have an interest in our operations or their progress. We will ensure that site operations will be securely managed, and do not present a hazard to those within the vicinity and the visual impact screened as reasonable circumstances permit. Members of the public have the right to be treated politely and with respect by our people, suppliers, and contractors.

7. Relations With Competitors

We consider that our success and growth is enabled through business opportunities gained by honest means and meeting exact standards of performance. We intend to compete fairly against our competitors. With our competitors, we will seek to support and promote industry interests and advance safe and environmentally sound working practices.

8. Workers' Rights

The Company is committed to complying with all relevant employment legislation and regulations. No person should be discriminated against based on age, gender, race, sexual orientation, gender reassignment, religion or belief, marital status, or pregnancy.

No person should be prevented from joining or forming a staff association or trade union. People will be made aware of the terms and conditions of their employment or engagement from the outset, including the legal rate of pay, method, and timing of payment; all rates of pay will adhere to legal minimum rates. Our people are also aware of the means to report grievances and have issues resolved.

9. Environmental Issues

The Company is committed to keeping the environmental impact of its activities to a minimum, and as a minimum the Company will ensure that it meets all applicable environmental laws.

10. Information & Confidentiality

Information received by our people, contractors, or agents will not be used for any other purpose beyond that for which it was given. The Company will process any personal data collected in accordance with its Data Protection Policy.



Signed: Paul David Munnelly, CEO