

## TRANSVAC BUSINESS CODE OF CONDUCT

### 1. INTRODUCTION

We hold our clients, suppliers, business partners and other stakeholder to the same standards that we hold ourselves. Running a good business means running a safe and ethical business that extends well beyond Transvac.

Transvac enjoys an excellent reputation in terms of the quality and innovation of our work, and in the way we keep honesty and integrity at the forefront of how we conduct business. Over the past four decades, we have earned our solid reputation through countless interactions with clients, suppliers, authorities and other stakeholders.

We always hold ourselves - and our clients, suppliers and subcontractors - to the highest ethical standards. Our Business Code of Conduct is designed to provide clarity about our expectations of those we partner with to meet the needs of our clients; including suppliers, vendors and subcontractors. This document is an overview of the guiding principles and values that govern how we conduct business and make ethical decisions.

When you work with us, you must ensure your company complies with this Code of Conduct.

Asking for Help and Reporting Concerns: If you become aware of any ethical issues that may affect Transvac, or have any concerns or questions, you should contact Jenny Lucas (email: [jennylucas@transvac.co.uk](mailto:jennylucas@transvac.co.uk)) or write to:

Transvac Systems Limited  
Bramble Way  
Alfreton  
Derbyshire  
England  
DE55 4RH

Letter to be marked PRIVATE AND CONFIDENTIAL - Managing Director

Transvac will assess your compliance with this Code: Transvac conduct audits and thoroughly investigates possible non-compliance with this Code. We strive to be prompt and fair in our investigations and conduct them confidentially to the extent possible under the circumstances. If you are involved in an audit or investigation, you must cooperate fully and comply with corrective measures if they are found to be needed. Any violations of this Code or failure to cooperate in an audit or investigation may jeopardize your business relationship with us, up to and including termination of any contracts you have with us.

Transvac values strong, long-term relationships with clients and suppliers. We realize that our relationships are strengthened when fundamentals such as safety, integrity and business ethics are aligned. Thank you for doing your part and helping us continue to build and maintain our hard-earned reputation; today and in the future.

## 2. CODE OF CONDUCT

### **Safety and Environmental Considerations**

The health and safety of our employees and everyone associated with our work is of utmost importance at Transvac. We are committed to adhering to the highest standards of safety practices; but more than that, safety is an intrinsic part of how we do business - we are committed to a "culture of caring" where safety is engrained in everything we do. Our culture of caring also extends to how we approach the environment and sustainability. It is important that our clients and suppliers strive to balance the social, economic and environmental aspects of their businesses; just as we do for our business.

You must always:

- Comply with applicable health safety and environmental laws and regulations.
- Apply safe work practices to all activities and instill a safety culture in your work environments and processes.
- Focus on accident prevention and minimizing exposure to health risks.
- Develop and implement emergency response plans and procedures.
- Develop, implement, and maintain environmentally responsible business practices.
- Work to deliver sustainable, efficient and effective goods, services and solutions.

## 3. QUALITY

Transvac is dedicated to delivering a superior client experience and value. We strive to delight our clients and exceed their expectations through high-quality and innovative solutions.

Our suppliers must always:

- Have the same commitment to quality in the goods, services and solutions with which you supply us.
- Ensure all goods, services and solutions you supply to us are in compliance with applicable laws and regulations

## 4. OBSERVANCE OF COMPETITION AND ANTI-TRUST RULES

Transvac is committed to conducting its business in full compliance with anti-trust and fair competition laws.

You must always:

- Comply with applicable anti-trust and competition laws.
- Compete honestly and fairly.

You must never:

- Engage in anti-competitive business practices intended to limit or impair full and open competition for the goods, services and solutions provided to and by Transvac.

## 5. BRIBERY AND CORRUPTION

Transvac wins and executes projects honestly and ethically.

You must always:

- Understand and comply with the the UK Bribery Act and applicable anti-corruption laws.
- Avoid any conduct that could reasonably be perceived by our customers or others as improper.
- Tell us about any attempt that is made to bribe you or solicit bribes from you while you are working with us.
- If you receive a request from a Transvac employee or representative which you reasonably believe is or may be (or may be perceived to be), a solicitation for a bribe, kickback, or other corrupt payment, we expect you to refuse the request and to let us know
- If you receive a request from a Transvac employee or representative which you reasonably believe is or may be (or may be perceived to be) a request to make a bribe or other corrupt payment to a third party (i.e. a client, or government official) on our behalf, we expect you to refuse the request and to let us know
- If you are offered or are aware of anyone else who is offered an inappropriate, or suspicious gift, award, hospitality or business courtesy, we expect you to let us know.

You must never:

- Solicit, or receiving anything of value from a Transvac representative, Client representative, Supplier representative, or anyone else which might be perceived as compromising (or actually compromises) your honest service to Transvac or our Clients.
- Offer or give anything of value to improperly obtain new business, retain existing business, or secure any improper advantage.
- Permit others to do such things.
- Make any type of facilitation payment, even if such payments are a common business practice or legal under local law.
- Furnish gifts, meals, hospitality, travel or other business courtesies to government officials if this would be illegal or could reasonably be perceived as improper.
- Make payments to political parties, party officials or candidates for political office that are illegal or could reasonably be perceived as improper.
- Offer anything to a Transvac' employee or family member of a Transvac' employee that could be interpreted as an attempt to influence the employee or put him or her under an obligation.
- Give a gift to a Transvac' employee, except an advertising or promotional item of nominal value.

## 6. INCLUSION AND DIVERSITY

Transvac believes that an inclusive environment enhances innovation and motivates the people that drive our company's growth.

We work to attract and retain diverse suppliers - large and small - in our markets around the world.

You must always:

- Provide fair and equal treatment to all in hiring, promotion, training, compensation, termination and disciplinary action.

You must never:

- Discriminate on the basis of age, culture, disability, education, gender, marital status, regional or national origin, sexual orientation, political affiliation, physical appearance, race, religion or any characteristic protected by law.

## 7. HUMAN RIGHTS

Transvac respects and protects the rights of those who work for and with us; and for the people in the communities where we do business.

You must always:

- Treat all your workers with dignity and respect.
- Support and respect human rights and avoid any involvement in human rights abuses.
- Conduct all operations in a socially responsible, harassment-free and non-discriminatory manner.
- Comply with applicable laws concerning equal opportunities, child labour, forced labour, human trafficking, working hours, freedom of association, and fair wages.
- Ensure that the confidentiality of client, supplier and employee whistle-blowers is maintained and that they are protected against retaliation.

## 8. INTEGRITY OF FINANCIAL AND PERFORMANCE RECORDS

Transvac relies on accurate information and reliable records to make responsible business decisions.

You must always:

- Comply with good practice, relevant standards and laws pertaining to record keeping and record retention.
- Engage in honest and accurate recording and reporting of information.

- Keep accurate and complete records as required by Transvac

You must never:

- Make false, overstated, artificial or misleading entries or omissions in any system, book or record for any reason.

## **9. TRADE AND EXPORT CONTROL**

Transvac complies with all international trade laws and regulations that apply to us wherever we conduct business.

You must always:

- Understand and comply with applicable laws and regulations relating to export, trade, non-proliferation and arms control.
- Understand and comply with any applicable trade sanctions.

You must never:

- Participate in boycotts or other restrictive trade practices prohibited or penalized under the law of England and Wales or applicable local law.

## **10. MONEY LAUNDERING PREVENTION**

Transvac is committed to complying with applicable anti-money laundering and anti-terrorism laws. Transvac only conducts business with reputable customers and suppliers involved in legitimate business activities with funds derived from legitimate sources.

## **11. CONFIDENTIALITY AND INTELLECTUAL PROPERTY**

Transvac deals with various types of proprietary, confidential and private information belonging to Transvac, our clients, suppliers, employees and others. Transvac' access and use is restricted for only its intended purpose.

Our clients and suppliers are required to:

- Protect Transvac' and our clients' proprietary information; protect its confidentiality and use such information only as it is authorized and intended
- Employ adequate internal controls in work processes and security measures for all computer systems, portable electronic devices, laptops and other storage devices to ensure the safety of information.