



In order to ensure that we all know what is considered or not considered as ethical behaviour within our organisation and to ensure that we comply at all times with all applicable laws and policies, we have developed



All Nasmyth Group Personnel must:

- Deal openly with and make fully disclosure to the Group;
- Not exploit their positions for personal gain in conflict with the interests of the Group;
- Act with honesty, integrity and in good faith when dealing with the Group or its customers.

This Policy outlines various situations in which the interests of the Group and its Personnel are potentially in conflict, and specifies the Group's expectations for Personnel behaviour in each case.

This Policy is only a guide and cannot address every situation, on occasion the situation will require interpretation to decide upon the appropriate course of action. In such situations, you are expected to raise the issue with your manager or the Contracts and Commercial Manager.

You report any breaches or potential breaches of this Policy of which you become aware.

No retaliation will be taken against anyone who reports a concern or suspicion in good faith or assists with an investigation, even if the report is mistaken. Any individual who retaliates in any way against a person who has in good faith reported a violation or suspected violation of this Policy will be subject to disciplinary action, up to and including termination.

Reports can be submitted to your manager, any member of HR, or the Contracts and Commercial Manager.

Failure to report knowledge of a violation of this Policy or failure to assist or co-operate in the investigation of reported non-compliance may result in disciplinary action against you.

Nasmyth Group Personnel are expected to avoid conflicts of interest between their personal interests and those of the Group, and to report them immediately should they arise. If you are in doubt as to whether a conflict may exist, you should immediately seek advice from your manager or the Contracts and Commercial Manager.





Slavery is illegal and a violation of human rights. Modern Slavery takes many forms including but not limited to; forced labour, child labour, exploitation, being controlled by an employer, debt bondage, being physically constrained, being sold or treated as a commodity and having restrictions on freedom of movement. These acts involve a person losing their freedom by being exploited by another for personal or commercial gain.

Nasmyth Group, has a zero-tolerance approach to Modern Slavery. We are committed to acting ethically and with integrity in all dealings and relationships. We will implement and enforce effective systems and controls to ensure Modern SlaveryAnti



Nasmyth Group is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented. Nasmyth has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the country we operate.

Nasmyth Group will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, in regard to our conduct both at home and abroad.

Nasmyth Group recognises that bribery and corruption are punishable by up to ten years of imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business, and take our legal responsibilities seriously.

Nasmyth Group accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the recipient of a business or a business advantage, or as a bribe to obtain or reward the recipient for a favour or benefits.
- It is not made with the suggestion that a return favour is expected.
- It is in compliance with local laws.
- It is given in the name of the company, not an individual's name.

