

## AXTER CODE OF ETHICS

At Axter Ltd (the Company), people are our most important resource. Since their motivation and competence is essential to our success and progress, the quality of human interaction is fundamental and depends on each individual.

### The Company's Values

The Company's corporate values centre on five key principles:

- **Respect**
- **Collaboration**
- **Integrity**
- **Service**
- **Equal opportunity**

**Respect** means consideration for others. People who respect each other get along better. Respect builds **collaboration** and confidence, which promote efficiency and harmony in the workplace.

We are an **equal opportunities** employer, which is crucial in today's multi-faceted society. We do not discriminate on the grounds of gender, sexual orientation, marital or civil partner status, gender reassignment, race, colour, nationality, ethnic or national origin, religion or belief, disability or age.

Many talented people are eager to work for us and deserve a fair chance at a job. Discrimination is not only against the law and morally reprehensible, but it is also detrimental to group performance because diversity is a tremendous corporate asset.

Collectively agreeing to adhere to these values enables us to act with **integrity** in the way we treat each other, our clients and our suppliers. They provide a framework for our day-to-day decisions and behaviour, which ultimately reflects in the quality of our client **service**.

Axter believes that it is important for the Company and its employees to maintain high ethical standards in order to preserve its reputation in the marketplace.

Good ethics are important to ensure that the Company meets not only its objectives in a fair and equitable manner but its wider social responsibilities externally. In addition, the Company is committed to ensuring high ethical standards within the workplace.

The procedure that follows provides general guidance on ethics and refers to other policies of the Company where necessary. The procedure will be closely monitored and will be developed as necessary to ensure that it meets the needs of the Company, its employees and its stakeholders.

Social audits will ensure that the Company is meeting its aims with regard to social impact and ethical behaviour and that its stakeholders perceive the Company in a positive light.

### Procedure

1. All employees will be provided with ethics training as part of the induction programme. Ongoing ethics training, as the ethics policy and procedure develops, will be cascaded to employees via management.

2. All employees are required to adhere to the Company's policy and procedure on business ethics. Employees who breach the Company's policy on business ethics will be subject to disciplinary action up to and including dismissal.
3. Employees who are faced with a potential breach of the business ethics code or have doubts about an ethical choice they are facing should, in the first instance, speak to their manager.
4. The Company has a Code of Conduct which employees are expected to abide by. A copy of the Code of Conduct and other policies relevant to this procedure are available in the Company's Staff Handbook.
5. The following areas are included in this procedure. However, this list is not exhaustive and will be developed as required.
  - a. Data protection/Access to employee data.
  - b. Whistleblowing.
  - c. The giving and receiving of gifts.
  - d. Confidentiality.
  - e. Relationships with competitors, suppliers, advertisers, etc.
  - f. Equal opportunities, discrimination and harassment.
  - g. The environment.
6. The Company endorses fully and adheres to the six principles of data protection, as set out in Article 5 of the General Data Protection Regulation (GDPR). These data protection principles are set out in the Company's Data Protection/Access to Employee Data policy and all employees are expected to familiarise themselves with its requirements. Employees should ensure that they understand how data protection impacts on their particular role, in particular with regard to external suppliers and customers. Employees who have any questions on the Company's Data Protection/Access to Employee Data policy should speak to their manager in the first instance.
7. The Company encourages a free and open culture in its dealings between its officers, employees and all people with whom it engages in business and legal relations. The Company recognises that effective and honest communication is essential if malpractice is to be effectively dealt with and the Company's success ensured. Employees should refer to the Company's Whistleblowing Policy and procedure which provides guidance to employees who feel that they need to raise issues relating to the Company with someone in confidence.
8. The Company does not believe that the giving and receiving of gifts from suppliers and customers is appropriate. In certain circumstances gifts may constitute a bribe. An employee who receives a gift from a customer or supplier, regardless of its value, must inform his or her manager who will decide whether the gift may be kept by the employee or whether it should be returned.
9. A confidentiality clause forms part of all employees' statement of particulars/contracts of employment. During the course of employment, employees will have access to information of a confidential and sensitive nature. Employees must not disclose to a third party any of the Company's confidential information, either during their employment or after their employment has ended. Confidential information includes information on the Company's present or potential customers or suppliers and any information relating to the Company's business, including marketing, corporate or financial plans.
10. The Company recognises that work may result in friendships and closer relationships developing. Relationships may develop not only with colleagues but suppliers and customers. It is natural for

relationships to develop in a working environment. While the Company has every respect for the privacy of its employees, it asks that all employees consider the impact that personal relationships can have on the Company. Employees are expected to familiarise themselves with the Company's Personal Relationships at Work policy and procedure.

11. The Company is committed to equality of opportunity and diversity in the workplace. It is the Company's policy to treat all job applicants and employees fairly and equitably, regardless of their sex, transgender status, pregnancy, maternity leave, age, sexual orientation, religion or belief, marital status, civil partnership status, race, colour, nationality, national origins, ethnic origin or disability. Furthermore, the Company will monitor the composition of the workforce and introduce positive action if it appears that this policy is not fully effective. Employees are required to conduct themselves in a way that promotes equal opportunities at all times. Good practice will be promoted by senior management and employees will be provided with relevant training. Employees who feel they have been discriminated against or suffered harassment should speak to a member of management immediately. Further information is available in the Company's Equal Opportunities policy and procedure.
12. Employees may seek to take up separate employment with another employer or pursue outside business interests while still remaining employed by the Company. Although the Company has no desire to unreasonably restrict an employee's external activities, it must seek to protect its own interests and those of all its employees. Employees will not be permitted to undertake business activities or other work where the Company considers that this is incompatible with its interests or with the employee's health or safety and, in any event, unless employees have obtained prior written authorisation from senior management. Further information is given in employees' contracts of employment.
13. The Company is committed to conserving the earth's resources and to do what it can to reduce any negative effects it has on the environment. Employees are required to use the Company's equipment and materials wisely, to reduce wastage and to recycle where possible. Employees are encouraged to play a positive role in contributing to the Company's vision for reducing our impact on the environment and promoting sustainability through innovation and systematic change.

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