

Ethics Policy



Governance

Purpose and Scope

Ergonomic Solutions (ES) expects the highest standard of ethical conduct and fair dealing in its relationship with its management, employees, customers, directors, shareholders, consultants, partners, suppliers, government agencies, competitors and with the local communities in which we operate.

The purpose and scope of this Policy is to provide guidance to management, employees, Board of Directors, agents, consultants, partners, suppliers, and others in assessing the many and sometimes complex decisions they have to make.

- The policy applies to all aspects of our governance, policy, research, commercial, operational and administrative activities.
- All those covered by the policy are personally accountable for operating within the scope and intent of the policy.
- We expect those organisations that provide products, goods and services to us to respect this policy.
- We request customers, suppliers, partners and distributors and all other external parties that we work with to respect our ethical positions.

PRINCIPLES

Taking responsibility for our actions (being accountable for what we say and do, learn from our mistakes) and

Acting with Integrity (being honest and ethical in our actions and to treat others as we wish to be treated ourselves) form an integral part of our organisations “Core Beliefs”.

THE POLICY

The following provide the ethical framework to which we aspire and apply to all the stakeholders.

Comply with relevant Laws & Regulations

- Observe the applicable national labour law regulations
- Observe prohibition of Child Labour as defined by United Nations Conventions
- Prohibit all forms of Forced Labour and Human Trafficking, and meet the obligations of the UK Modern Slavery Act 2015
- Comply with local legislation covering bribery, fraud, theft and corruption and the principles set out in the EU Policy against Corruption COM (2003) 317 final and the American Foreign Corrupt Practices Act (FCPA)

Human Rights

- Comply with Global Policies for Human Rights and Labor. As part of our commitment, ES operates with respect to the universal human rights identified in the UN Declaration on Human Rights and in accordance with the UN Global Compact. We do not permit the use of child labour, forced labour or physical punishment in any ES operations.
- We respect and support internationally recognised human rights standards and undertake to prevent any and all actions regarded as human rights violation in our operations and value chain.
- Modern Day Slavery Statement: At ES we’re committed to continuously improving our practices to identify and eliminate any slavery and human trafficking in our business and supply chains, and to

acting ethically and with integrity in all our business relationships.

- We continuously review and seek to mitigate risks in relation to suppliers who operate in areas where there may be modern slavery risks in the supply chain.
- Concerns about possible human rights violations must be reported to the Executive Team who shall take prompt corrective action.

Mutual Respect in relationships with others

- Treat managers, employees, customers, shareholders, consultants, partners, suppliers, government agencies, all others and the public respectfully, professionally and fairly.
- Take account of confidential issues when appropriate.
- Deal courteously with everyone including those who hold opinions that differ from ours.
- Do not discriminate against anyone on the basis of their gender, sexual orientation, marital or civil partner status, gender reassignment or gender identity, race, colour, nationality, ethnic or national origin, religion or belief, pregnancy or maternity/paternity, disability or age.
- We will not tolerate any bullying or abuse, no matter what form it may take, verbal or nonverbal, in person or via the internet. This includes all inappropriate or unwelcome sexual advances/ sexual harassment incidences or behaviours.

- ES does not tolerate any malpractice, impropriety, abuse or wrongdoing and encourages employees to come forward and voice their concerns via their manager or the Human Resources Department.
- If an individual does not feel comfortable going to their manager or the Human Resources Department in case of serious violation of laws, regulations, internal policies, procedures or code of conduct it is possible to make use of a whistle blowing system. ES has formulated a Whistle Blowing Policy to enable employees and other individuals associated with the Company to not overlook any concern but instead raise it at an early stage and in the right manner, without fear of retaliation, victimization, subsequent discrimination or disadvantage at workplace. If you are a whistleblower i.e., an employee who reports certain types of wrongdoing seen or suffered at work, you will be protected from dismissal, demotion, or any other retaliatory treatment because of the well-intentioned reporting of possible violations of law or regulation. Please refer to our Whistle Blowing Policy for the details.

In our Operations

- Operate with honesty and integrity in all our work, taking steps to identify and deal with corrupt business practices and professional misconduct.
- Maintain the integrity of information and guarantee data protection and privacy by implementing the “IT, Electronic Communication and Internet Policy”, “Data Breach Policy” and “Data Protection Policy”.
- Be open and transparent in making decisions and undertaking activities on behalf of ES.

- At ES everyone should feel comfortable to speak their mind, particularly with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions.
- Reach conclusions based on best business, commercial and professional practice, as well as social and environmental impact, having considered all views.
- Employees, contractors, agents, consultants and others should seek to avoid situations where personal interests might or might appear to be in conflict with the interests of ES.
- Any situation which gives rise or might give rise to a conflict of interest with ES should be disclosed.
- Ensure business decisions are transparent and based on objective assessment.
- Recognise appropriately the intellectual, professional and operational contributions of others.
- ES publicly discloses all financial and in-kind contributions to political parties, politicians, lobby groups, charitable organizations, and advocacy groups.

ESG Impact

ES is committed to minimising the adverse impacts of our decisions and actions on the environment, on people and their welfare. This also includes reporting with complete transparency regarding our impact on the environment, people and their welfare whenever possible.

Ethical Leadership

The Group Board and the Chief Executive Officer must lead by example and this will signal to all that they can have confidence in what ES does and the way that it is done. We conduct anti-corruption and other compliance training for individuals in higher risk roles and consider the consequences of all our decisions on ES's reputation.

The Group Board and/or Chief Executive Officer have the responsibility to sign off any direct or indirect political contributions, charitable donations, lobby groups, advocacy groups and sponsorships.

Accountability

- We honour commitments, deliver on our promises and take responsibility for our decisions.
- We never use a contractor, agent, consultant or other third party who perform any illegal act or violate ES policy.
- We always focus on the needs of our customers, our communities and the other stakeholders. The company strives to improve customer satisfaction (CS) and offer products, solutions and services that enrich the lives of people around the world. Also Refer to our "Quality Policy" for our principles on quality in our products and services.

MONITORING & CONTINUOUS IMPROVEMENT

Training on this Policy, and the risk that ES faces from breaches of this Policy, will be provided for employees as necessary. All those covered by the policy are responsible for ensuring that activities for which they are responsible

comply with this policy. People should raise concerns about applications and procedures, or administrative and support activities with managers or the Human Resources department.

As a part of the grievance mechanism people should speak up to raise any concerns, they may have about any instances which may not comply with this Policy to their manager or the Human Resources department. Serious or unresolved concerns should be referred to the Board Ethics Committee. The Board Ethics Committee is a small team lead by the Chairman of the Group Board. Serious issues which cannot be resolved via existing mechanisms may be referred to the Board Ethics Committee at any time.

This policy will be reviewed and adjusted as necessary on an annual basis. In case of adjustments, the policy will be shared with all employees again.

CONSEQUENCES OF NON-COMPLIANCE

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

Breaches of the policy which cannot be dealt with by management may also be referred to the Board Ethics Committee. The Board Ethics Committee may then convene, with appropriate additional expertise if needed, to consider the issue. The Board Ethics Committee's findings will be accountable to the ES Group Board. The Board Ethics Committee will report annually on any ethical issues or activities to ensure our policy is being applied consistently. ES may terminate its commercial relationship with any suppliers, contractors, agents, distributors and partners if they breach this policy.

Other references

[Professional Code of Conduct >](#)

[Quality Policy >](#)

[IT, Electronic Communication and Internet Policy >](#)

[Data Breach Policy >](#)

[Data Protection Policy >](#)

[Whistleblower Policy >](#)

This policy applies to Ergonomic Solutions International Limited and subsidiary companies

