

Ethics Policy

Code of Conduct for Service Providers

This Code of Conduct outlines the legal and ethical business standards expected from all Service Providers of SGA Technologies and SGA Poole. It serves as a practical guide to help ensure compliance with our company's standards, and should be kept accessible for regular reference. Familiarize yourself with its contents to align your business practices with the expectations of SGA Technologies and SGA Poole.

FOREWORD

At SGA Technologies and SGA Poole, we are committed to conducting our business with the highest ethical standards and in full compliance with all UK laws and regulations. These principles are the foundation of how we operate, and we expect the same level of commitment from our suppliers, contractors, and representatives.

A strong reputation is hard-earned, easily lost, and difficult to rebuild. It is crucial that we remain vigilant in upholding our ethical standards. Together, we have the capability to lead in our market segments, and we rely on your integrity, dedication, and adherence to this Code of Conduct to maintain our position.

Thank you for your commitment to fostering an ethical business environment.

Christopher Brown
Managing Director, SGA Technologies Limited



Date:

8/10/2024

Rob Rhodes
Managing Director, SGA Poole Limited



Date:

10/10/24

INTRODUCTION

SGA Technologies and SGA Poole are dedicated to maintaining the highest standards of ethics and compliance with all applicable UK laws and regulations. We expect the same commitment from our suppliers, contractors, agents, consultants, representatives, and distributors (collectively referred to as "Service Providers").

This Code of Conduct applies to every Service Provider that has a business relationship with SGA Technologies and/or SGA Poole. By conducting business with or on behalf of our companies, you share the responsibility to uphold the ethical and lawful business practices of SGA Technologies and SGA Poole. Service Providers are required to adhere to the conditions outlined in this document.

BUSINESS PRACTICE REQUIREMENTS

SGA Technologies and SGA Poole expect all Service Providers to comply with the following business practices:

Compliance with Laws, Regulations, and Contracts

All Service Providers must comply with applicable UK laws and regulations relevant to their business activities, employees, and operations. Furthermore, Service Providers must adhere to the terms, conditions, and provisions specified in their contracts with SGA Technologies and/or SGA Poole.

No Bribery or Money Laundering

SGA Technologies and SGA Poole maintain a zero-tolerance policy toward bribery, corruption, and other forms of financial misconduct. Our policy strictly prohibits any form of corruption, bribery, extortion, embezzlement, or money laundering. We are committed to complying with all relevant laws and regulations, including the UK Bribery Act, and to upholding integrity and the highest ethical standards in all our business dealings.

No Discrimination or Harassment

Service Providers must not engage in discriminatory hiring or employment practices based on race, national origin, gender, age, sexual orientation, citizenship, marital status, disability, or religion. A workplace free from unlawful harassment is mandatory.

Employment Practices

Service Providers must comply with all relevant employment laws and regulations, including those related to minimum wage, maximum work hours, overtime, and benefits. They must employ only individuals who meet the minimum legal working age as stipulated by applicable laws and regulations.

No Forced Labour, Slavery, or Human Trafficking

Service Providers must not engage in, facilitate, or tolerate any form of forced or involuntary labour, slavery, or human trafficking.

Drug-Free Workplace



SGA Technologies and SGA Poole require Service Providers to maintain a workplace free from illegal drugs.

Immigration Law Compliance

Service Providers must ensure that all employees have the legal right to work in the country where the work is performed and must verify eligibility through the appropriate documentation as permitted by applicable laws.

Safe Work Environment

Service Providers must provide a safe and sanitary workplace, including appropriate protective equipment, and comply with all applicable environmental, health, and safety laws and regulations.

Environmental Practices

Service Providers must operate their businesses in an environmentally responsible manner, complying with all relevant environmental laws and regulations. This includes obtaining necessary permits, providing required environmental reports, controlling emissions, and properly disposing of waste.

Gifts and Gratuities

SGA Technologies and SGA Poole conduct business based on the merits of our products and services. We do not engage in the exchange of business courtesies to gain an unfair competitive advantage, and we expect the same from our Service Providers. Except for modest business meals, refreshments, or promotional items of insignificant value, no Service Provider should offer or provide any gifts, gratuities, or other benefits to our employees. These items should not be given frequently or with the intent of securing an improper business advantage. Our employees are expected to perform their duties fairly and impartially, avoiding any appearance of favoritism or conflict of interest.

Conflicts of Interest

Service Providers are expected to avoid any conflicts of interest, or situations that may appear to present a conflict, in their dealings with SGA Technologies and/or SGA Poole. Any potential or apparent conflicts of interest should be reported to SGA immediately.

Exports and Imports

Service Providers must be familiar with and strictly adhere to all applicable laws and regulations regarding exports and imports. This includes providing accurate information, obtaining necessary documentation, and complying with export control and customs requirements.

No Boycotts

Service Providers must not engage in or support any boycotts or blacklisting activities that violate applicable anti-boycott laws or regulations.

Eradication of Conflict Minerals

Service Providers are expected to take steps to determine whether their products contain

conflict minerals (e.g., tin, tantalum, gold, tungsten) and, if so, to implement supply chain due diligence to identify the sources of these minerals. Efforts should be made to eradicate the use of conflict minerals that finance or benefit armed groups in the Democratic Republic of Congo, adjoining territories, or other regions as defined by OECD guidance.

No Counterfeit Parts

Service Providers must implement appropriate methods and processes to minimize the risk of introducing counterfeit parts or materials into products supplied to SGA Technologies and SGA Poole.

Accounting Practices

Service Providers must comply with accepted accounting standards, controls, and disclosure requirements at all times, ensuring that auditors receive accurate information. No Service Provider should knowingly participate in any scheme that violates these accounting standards.

Intellectual Property

Service Providers must respect the intellectual property rights of others and comply with all applicable laws and regulations related to patents, copyrights, trademarks, and trade secrets.

Confidential and Proprietary Information

Service Providers are required to protect the confidentiality and proprietary information of SGA Technologies and SGA Poole. This includes safeguarding information technology systems used to store or transmit company information and avoiding improper access to confidential or proprietary information from other companies, including competitors and customers.

Accurate Technical Information

SGA Technologies and SGA Poole are committed to providing accurate technical information to guide Service Providers and customers in the correct manufacture and use of our products. Service Providers must not knowingly record or use any false technical data.

Antitrust Compliance

Service Providers must conduct their business in compliance with applicable antitrust laws and regulations. This includes avoiding discussions with competitors about prices, sales terms, territory or market division, customer allocation, or boycotts.

Suspected Noncompliance

Service Providers must promptly evaluate and address any suspected noncompliance with applicable laws and regulations. Additionally, they are expected to report any noncompliance issues affecting the company to the relevant SGA Technologies and/or SGA Poole representative.

Communication

Service Providers are responsible for communicating the standards outlined in this Code of



Conduct to their employees.

Sub-Tier Suppliers

Service Providers are expected to ensure that any third parties they engage to support their activities on behalf of SGA Technologies and SGA Poole also adhere to similar ethical principles.

Certification

SGA Technologies and SGA Poole may periodically request Service Providers to certify their compliance with this Code of Conduct. Service Providers must provide written certification upon request.